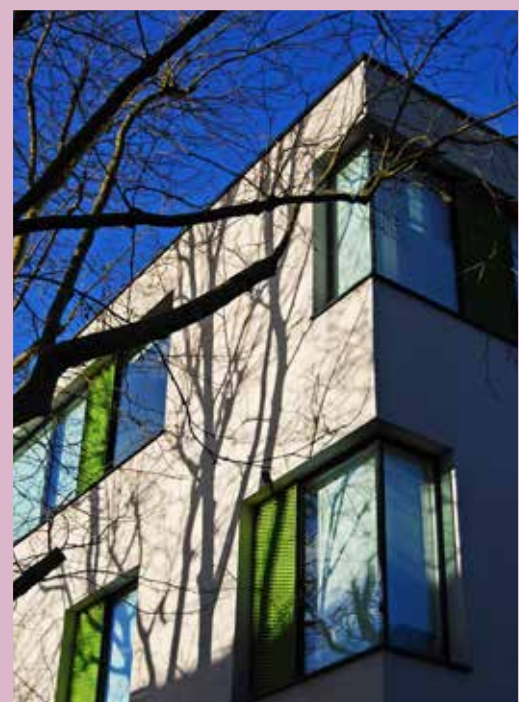


CAMDEN

Draft Camden Local Plan 2015



Contents

1.	Introduction	5
2.	Growth and spatial strategy	15
	Policy G1 Delivery and location of growth	16
3.	Meeting Housing Needs	33
	Policy H1 Maximising housing supply	35
	Policy H2 Maximising the supply of self-contained housing from mixed-use schemes	42
	Policy H3 Protecting existing homes	47
	Policy H4 Maximising the supply of affordable housing	50
	Policy H5 Protecting and improving affordable housing	58
	Policy H6 Housing choice and mix	61
	Policy H7 Large and small homes	69
	Policy H8 Housing for older people, homeless people and vulnerable people	75
	Policy H9 Student housing	81
	Policy H10 Housing with shared facilities ('houses in multiple occupation')	88
	Policy H11 Accommodation for travellers	93
4.	Community, health and well-being	95
	Policy C1 Improving and promoting Camden's health and well-being	96
	Policy C2 Community facilities, culture and leisure	102
	Policy C3 Public houses	112
	Policy C4 Safety and security	116
	Policy C5 Access for all	119
5.	Economy and jobs	121
	Policy E1 Promoting a successful and inclusive Camden economy	123
	Policy E2 Employment premises and sites	130
	Policy E3 Tourism	134
6.	Protecting amenity	137
	Policy A1 Managing the impact of development	138
	Policy A2 Provision and enhancement of open space	144
	Policy A3 Protection, enhancement and management of biodiversity	154
	Policy A4 Noise and vibration	161
	Policy A5 Basements and Lightwells	165
7.	Design and Heritage	173
	Policy D1 Design	174
	Policy D2 Heritage	183
	Policy D3 Shopfronts	191
	Policy D4 Advertisements	194
8.	Sustainability and climate change	197
	Policy CC1 Climate change mitigation	198
	Policy CC2 Adapting to climate change	205
	Policy CC3 Water and flooding	210
	Policy CC4 Air quality	215
	Policy CC5 Waste	218

9.	Town centres and shops	221
	Policy TC1 Quantity and location of retail development	223
	Policy TC2 Protecting and enhancing Camden's centres and other shopping areas	227
	Policy TC3 Protecting shops outside of centres	230
	Policy TC4 Food, drink, entertainment and other town centres uses	231
	Policy TC5 Small and independent shops	236
	Policy TC6 Markets	238
10.	Transport	241
	Policy T1 Prioritising walking, cycling and public transport	244
	Policy T2 Car-free development and limiting the availability of parking.	248
	Policy T3 Improving strategic transport infrastructure	250
	Policy T4 Promoting the sustainable movement of goods and materials	251
11.	Delivery and monitoring	253
	Policy DM1 Delivery and monitoring	254
12.	Appendices	261
	Appendix 1 Infrastructure Schedule	263
	Appendix 2 Noise Thresholds	277
	Appendix 3 Policies Map Alterations - refer to separate document	

1. Introduction

What is the Local Plan?

- 1.1 The Camden Local Plan will replace the Council's current Core Strategy and Development Policies planning documents (adopted in 2010). It will ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.
- 1.2 The Local Plan will play an essential role in the delivery of the Camden Plan, the Council's vision for the borough, in particular the objectives of creating the conditions for and harnessing the benefits of economic growth, reducing inequality and securing sustainable neighbourhoods. It will also assist the delivery of other plans and strategies prepared by the Council and other service bodies.



Other Council planning documents

- 1.3 The Planning system is plan-led. This means the Council's decisions on planning applications should be taken in line with its development plan unless there are significant matters (material considerations) that indicate otherwise¹. Therefore, our development plan documents are the basis of our planning decisions.
- 1.4 The Local Plan will be the key document in Camden's development plan. Other documents in the Council's development plan are:
- 1.5 Camden Site Allocations - this identifies known development sites in Camden's main growth areas and other locations across the borough and set out the Council's expectations for them. It was adopted by the Council in 2013.
- 1.6 Fitzrovia Area Action Plan - this responds to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites. It was adopted by the Council in 2014.
- 1.7 Euston Area Plan – This provides a single strategic plan to help shape change in the area around Euston Station up to 2031. It seeks to ensure that, despite Camden Council's strong opposition to HS2, if the HS2 High speed rail link goes ahead, we can secure the best possible future for the residents, businesses and visitors to Euston. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London.

- 1.8 London Plan – this is the Mayor’s planning strategy for Greater London. It sets out an economic, environmental, transport and social framework for development in the capital. London boroughs’ Local Plans need to be in general conformity with the London Plan. The London Plan sets borough level housing targets and identifies locations for future growth of London wide importance.
- 1.9 The following emerging plans will form part of Camden’s development plan when they are formally adopted by the Council at the end of the statutory preparation process.
- 1.10 North London Waste Plan – this is being prepared jointly by seven North London waste planning authorities - Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It will identify a range of suitable sites for the management of all North London’s waste up to 2031 and include policies and guidelines for determining planning applications for waste developments.
- 1.11 Gypsy and Traveller Site Allocations - this will identify sites for the gypsy and traveller community in line with national Planning Policy for Travellers Sites.

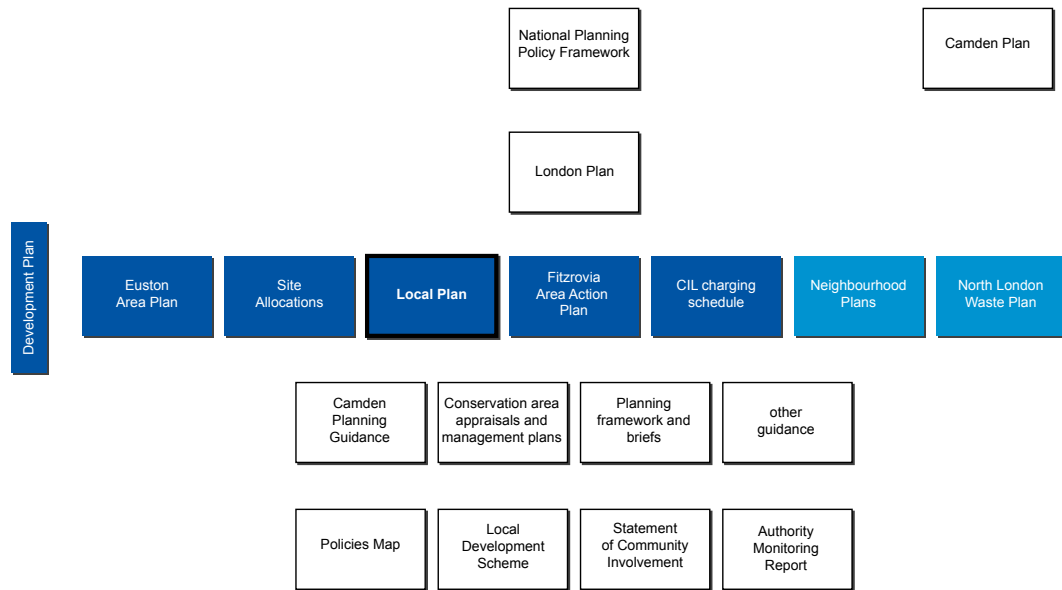
Neighbourhood planning

- 1.12 Communities can now influence the future of their local areas through preparing a neighbourhood plan that sets out the vision for the area and general planning policies to guide development in the neighbourhood. Neighbourhood plans are led and written by the community, not the Council. They have to be in line with the overall strategic approach in Camden’s existing adopted plans and national policy.
- 1.13 A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council and will be taken into account alongside our own plans when we make decisions on planning applications in that area.
- 1.14 Many communities in Camden are engaged in neighbourhood planning, with the following areas having formally designated neighbourhood forums: Fortune Green and West Hampstead, Kentish Town, Highgate, Somers Town, Dartmouth Park, Camley Street, Hampstead, Redington and Frognal and Church Row and Perrins Walk.

Other planning guidance

- 1.15 The Council has prepared a number of other documents that provide advice and guidance on how our planning policies will be applied for certain topics, areas or sites (sometimes known as supplementary planning guidance (SPG)). They are not part of the statutory development plan for Camden and therefore do not have the same weight in decision making. However, they are important supporting documents. They are available on the Council’s website and include:
- Camden Planning Guidance (CPG) supplementary documents;
 - Conservation area appraisals and management strategies; and
 - Planning Frameworks and briefs.

Planning document hierarchy



National Planning Policy Framework

- 1.16 In 2012, the government introduced the National Planning Policy Framework (NPPF) to replace the majority of previous national planning policy. Councils must have regard to the NPPF when drawing up their plans and it is a material consideration in decision making. The NPPF is supported by more detailed national Planning Practice Guidance.
- 1.17 The NPPF includes a ‘presumption in favour of sustainable development’. It states that for plan making the presumption means that local authorities should positively seek opportunities to meet the development needs of their area and that plans should meet objectively assessed needs. Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

Duty to co-operate

- 1.18 Plans now have to be prepared in accordance with the ‘duty to co-operate’ that places a legal duty on local authorities and other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation on strategic cross-boundary matters. The Council will continue to engage with its neighbouring boroughs and other relevant organisations in the preparation of this Plan to meet its duty to co-operate.

Community involvement in the Local Plan

- 1.19 The Council started initial engagement with residents, businesses and the development industry on the review of our key planning policies in late 2013. The comments we received during the initial engagement were taken into account in preparing this draft Local Plan.
- 1.20 Comments are now invited on the effectiveness of the policies in this draft Plan. Following public consultation and engagement on this draft, we will take into account the comments received in preparing a revised version of the Local Plan.

This will be published for further comment prior to submission to the government for public examination by a Planning Inspector.

Sustainability appraisal and other assessments

- 1.21 The Local Plan is subject to a number of impact assessments, including Sustainability Appraisal (incorporating Strategic Environmental Assessment), Health Impact Assessment, Habitats Regulations Assessment and Equalities Impact Assessment. The Sustainability Appraisal presents an appraisal of the draft Plan, including an appraisal of alternative approaches for addressing a range of key plan issues. The Sustainability Appraisal and other impact assessments are published alongside this document for consultation.



The evidence base for the Local Plan

- 1.22 The policies in the Local Plan need to reflect up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the area and must meet identified needs in accordance with the NPPF. The Council has collected a wide range of information and studies to support this plan, including studies on housing need, employment land, retail floorspace, infrastructure and open space, as well as monitoring information. These can be viewed on the Council's website.

Community Infrastructure Levy (CIL)

- 1.23 The Community Infrastructure Levy is a charge enabling local authorities to raise funds for infrastructure to meet the needs arising from new developments. The money raised will be used to fund local infrastructure such as schools, community facilities, transport improvements and other forms of provision. The use of planning obligations or 'planning gain' currently secured through the use of Section 106 agreements is to be scaled back with a restriction on the pooling of contributions towards a specific infrastructure project.
- 1.24 Policy DM1 - Delivery and Monitoring and Appendix 1 explain in detail how the Council will use planning contributions to fund new infrastructure.

The challenges we face

1.25 Camden's planning strategy is being prepared in the context of the social, economic and environmental changes we face as a borough. Some of the key challenges and issues we need to address in our planning policies are outlined below.

Adapting to Camden's growing population and to social change

1.26 The number of people living in Camden is increasing and the makeup of the borough's population is changing. Key changes include an increasing number of children in the borough and a rapidly growing older population. Responding to changes in the way we live our lives including how we work, shop and spend our leisure time together with how we access services are a key challenge for this Local Plan.

Maintaining a successful economy and improving opportunities

1.27 Camden has a very successful and diverse economy and it makes a significant contribution to the UK economy as well as being a key part of Central London's economy, with its concentration of businesses and retail and tourism uses. The Council wants to maintain and strengthen Camden's economy and competitiveness, whilst keeping the boroughs special identity. We need to ensure that we fully support our residents and businesses to make the most of the opportunities.

1.28 Employment is the biggest factor affecting income inequality and so we need to ensure we get more people into work and help them to develop their careers in the long-term. This can be supported through a range of measures, helping people find work or training and using links with businesses.

Inequalities

1.29 The success of Camden's economy is not shared by all and the borough has some of the most deprived neighbourhoods as well as some of the most prosperous. There are also significant health inequalities in the borough. The Council wants to ensure that members of our community have access to good housing, jobs, skills, training and education, public transport and health and community facilities to help promote equality, inclusion, to ensure everyone has the opportunity to succeed and nobody gets left behind. Achieving strong and resilient communities is a key challenge.

The supply and cost of housing in the borough

1.30 Many people want to live in Camden but there is a limited supply of homes and prices are high. It is important to ensure that we help keep Camden's social mix and make sure that the borough does not become polarised between the wealthy and less well off residents. We face the challenge of providing a diverse range of housing and ensuring we provide mixed areas with sustainable communities.

Health and well-being

- 1.31 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. Addressing these inequalities and improving Camden's health and well-being, both physical and mental, goes beyond improving access to medical facilities but includes a range of measures to improve our social and physical environment.

Improving transport

- 1.32 Camden benefits from some of the best transport accessibility in the country, being well served by bus, tube and rail, providing links within London, to other parts of the country and Europe. We need to ensure that, with the projected rise in numbers of people living in, working in and visiting the borough, people can move around easily. Road traffic can harm local air quality and, through this, the health of those living in the area. We want to continue to promote travel that is easy, safe, healthy and does not harm our local environment or contribute to climate change.

Quality of the environment

- 1.33 Camden has many attractive and historic neighbourhoods (such as Hampstead, Highgate, Primrose Hill and Bloomsbury) and numerous parks and open spaces (ranging from local playgrounds to Hampstead Heath). These contribute greatly to the attractiveness of the borough. We need to make sure that the growth and change respects the character, heritage and distinctiveness of Camden's valued and special places.

Crime and safety

- 1.34 Camden experiences the crime and disorder common in inner city areas and antisocial behaviour, crime and drugs are major concerns for local residents. The challenge we face is to make the borough a safer place whilst ensuring it maintains the vibrancy that makes it such an attractive place to live, work and visit.

Vision and objectives

1.35 In 2012, the Council set out its 5 year vision for the borough in the Camden Plan. The overall vision of the Camden Plan also acts as the vision for this Local Plan:

We want to make Camden a better borough — a place where everyone has a chance to succeed and where nobody gets left behind. A place that works for everyone.

1.36 The key strategic objectives of the Camden Plan are to:

- provide democratic and strategic leadership fit for changing times;
- developing new solutions with partners to reduce inequality;
- creating conditions for and harnessing the benefits of economic growth;
- investing in our communities to ensure sustainable neighbourhoods; and
- delivering value for money services by getting it right first time.

Strategic objectives

1.37 We have developed a series of objectives for the Local Plan to achieve our vision and help deliver the objectives of the Camden Plan. The strategic objectives of the Plan are set out below alongside the Camden Plan objectives where they contribute to achieving and the relevant Local Plan policies.

1.38 The following numbers identify Camden Plan objectives in the table below:

1. Developing new solutions with partners to reduce inequality
2. Creating conditions for and harnessing the benefits of economic growth
3. Investing in our communities to ensure sustainable neighbourhoods

It is not expected that strategic objectives and planning policies can assist directly in delivering the other two Camden Plan objectives.

Strategic objectives	Camden Plan objectives	Local Plan policy
1. To create the conditions for growth ensuring it takes place in the most appropriate and sustainable locations and minimises the impacts of development and to harness the benefits of this growth so it meets the needs of Camden's communities for homes, jobs and services and preserves and enhances the borough's unique character and appearance.	1, 2, 3	S1, H1, H2, H4, H6, H7, E1, A1, A2, D1, D2, CC1, TC1, T1
2. To secure safe, socially mixed and balanced areas with strong, cohesive and resilient communities to help reduce inequality in the borough, while supporting the provision of the accessible facilities and services needed to meet community needs.	1, 2, 3	S1, H1, H2, H4, H5, H6, H7, H8, H9, H10, H11, C1, C2, D1,
3. To provide homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes. Self-contained housing is the priority use of the Local Plan.	1, 3	S1, H1, H2, H3, H4, H5, H6, H7, H8, H9, H10, H11
4. To strengthen Camden's nationally-important economy, in terms of business and employment, the knowledge economy, shopping and entertainment, culture, entertainment and tourism, and to secure benefits for local people to reduce inequalities in the borough through increased access to jobs, skills, training and education opportunities, ensuring nobody gets left behind.	1, 2, 3	E1, E2, E3, S1, TC1, TC2,
5. To support the existing and future successful development of our town and neighbourhood centres and the retail areas in Central London, while adapting to changes in their role and how people shop.	2, 3	TC1, TC2, TC3, TC4, TCR, TC6
6. To promote and support the successful development of the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead, and Central London and to ensure that all development is supported by necessary infrastructure and maximises the opportunities and benefits for the local and surrounding communities and the borough as a whole.	1, 2, 3	S1, D1
7. To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.	1, 2, 3	D1, D2, A1, CC1, CC2, CC3

Strategic objectives	Camden Plan objectives	Local Plan policy
8. To promote sustainable transport for all and to make Camden a better place to cycle and walk around, to reduce air pollution, reliance on private cars and congestion and to support and promote new and improved transport links (although the Council remains opposed to HS2).	3	T1, T2, T3, T4
9. To make sure that development in Camden minimises its energy use by encouraging local efficient energy generation, achieving the highest possible environmental standards, and is designed to adapt to, and reduce the effects of, climate change.	3	CC1, CC2, CC3, CC4, CC5, D1
10. To improve and protect Camden's Metropolitan Open Land, parks and open spaces, and protect and enhance biodiversity, in addition to providing for new habitats and open space.	2, 3	A3, A4
11. To promote healthier lifestyles and support improvements that contribute to the health and well-being of Camden's population, to reduce health inequalities in the borough.	2, 3	C1, C2, C4, A2, CC1, CC2, CC4, A1, A3 D1, T1
12. To promote and protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place for residents, workers and visitors.	3	D1, A1,
13. To reduce, plan for and manage Camden's waste, including by working with our partner boroughs in the North London Waste Authority area to work towards self- sufficiency within London as a whole.	2, 3	CC5

2. Growth and spatial strategy

Delivery and location of growth

- 2.1 Camden, along with London as a whole, is experiencing significant change, with substantial population growth and increases in demand for housing and employment.
- 2.2 The Council's overall objective is to create the conditions for growth to provide the needed homes, jobs and other facilities, while ensuring that this growth delivers, opportunities and benefits for our residents and businesses. Growth should create the conditions for sustainable development and economic growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

Policy G1 Delivery and location of growth

The Council will create the conditions for growth to deliver the homes, jobs and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

We will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

- a. supporting development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
- b. resisting development that makes inefficient use of Camden's limited land;
- c. expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and / or
- d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities set out below.

Development will take place throughout the borough with the most significant growth expected to be delivered through:

- e. a concentration of development in the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road;
- f. appropriate development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead; and
- g. the Council's Community Investment Programme (CIP).

The Council identifies and provides guidance on the main development opportunity sites in the borough through our Camden Site Allocations and Area Action Plans.

Development in the growth areas and other highly accessible areas should be consistent with the priorities and principles set out below.

Overall approach to growth and development

- 2.3 Camden is forecast to grow from 225,100 (in mid-2013) to 253,300 people by 2031. That is more than 1,500 additional people per year. In the same period the forecasts indicate that the number of households will grow by over 17,500 or almost 1,000 per year. Population growth creates the needs for more services, more school places and more jobs. Currently the number of jobs in Camden is forecast to grow from 286,000 to 375,000 by 2031. We aim to ensure that Camden residents are equipped with the skills and qualifications to benefit from this growth in jobs, through linking the efforts of the Council, schools and employers to help achieve this.



- 2.4 Camden has excellent transport connections, high quality places and its high levels of accessibility, making it a suitable and attractive location for growth. We recognise, however, that there is limited land in Camden to accommodate this growth and so there is a need to use Camden's land more efficiently to ensure that it delivers the priorities set out below and the objectives of this plan.
- 2.5 We can make development achieve these priorities by applying the policies of this plan. It is important that growth delivers not only homes, but also employment space and work and training opportunities for Camden residents, together with the services and facilities that are needed to maintain and create healthy and sustainable communities where nobody gets left behind and everyone has a chance to succeed.
- 2.6 The Council will therefore seek to support and facilitate growth that delivers the development appropriate to its location and harnesses this growth to delivering clear benefits for Camden residents and businesses.

Delivering growth

- 2.7 The Council will promote the most efficient use of Camden's land and buildings while also seeking to improve the quality of our environment, protect the amenity of occupiers and neighbours and meet its other planning objectives.

Making the most of our limited land

- 2.8 The Council wants to encourage developments with high densities (that is, have more buildings or rooms in a given area) to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough (generally, Growth areas, Central London and town centres of Camden Town, Finchley Road / Swiss Cottage, Kilburn High Road, Kentish Town Regis Road and West Hampstead).
- 2.9 Development should be of excellent design quality and should sensitively consider the amenity of occupiers and neighbours, the heritage and the character and built form of its surroundings, particularly in conservation areas. Good design can increase density while protecting and enhancing the character of an area. (Please see policies D1 and D2 for more detail on our approach to design and heritage.)
- 2.10 The Council will expect the density of housing development to take account of the density ranges set out in the London Plan's Sustainability Residential Quality density matrix (Table 3.2). As Camden is generally well served by public transport, the Council will expect densities towards the higher end of the appropriate density range in the matrix unless it can be demonstrated that the specific circumstances of a development mean that higher densities cannot be achieved. Densities below the relevant range in the density matrix will not be permitted. In addition, development schemes with a density below that of the surrounding area will normally be resisted.
- 2.11 Tall buildings are one form of high density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and consideration of the impact on the surrounding area. Further detail on our approach to tall buildings is set out in policy D1.

Mixed use developments

- 2.12 The provision of an appropriate mix of uses, both within areas and in individual buildings, can also contribute to successfully promoting future growth in Camden and making efficient use of its limited land. A mix of uses can:
- reduce the need to travel by locating a range of uses together and so reduce the need for some journeys, helping to cut congestion in the borough and improve air quality;
 - increase the provision of much-needed housing; and
 - promote successful places that have a range of activities and are used throughout the day, increasing safety and security.
- 2.13 The Council will encourage the provision of a mix of uses in suitable locations and expect development proposals of an appropriate size in Growth areas, Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage and Kilburn High Road to contribute towards meeting Camden's pressing need for self-contained housing. This reflects the designation of self contained

housing as the priority land use of the Plan (see policy H2 for maximising the supply of self contained housing). The Council's Site Allocations document and Area Action Plans identify future development sites and provides guidance for their future development, including where mixed use development is appropriate. (See policy H1 for further guidance on mixed use).

Multi-site proposals

- 2.14 In certain circumstances there may be demonstrable reasons why greater benefit could be achieved to the overall objectives of this plan through considering development proposals across a number of sites, rather than as individual schemes. For example, it may be that more affordable homes, open space or community facilities could be delivered or more affordable employment space or training and apprenticeships could be secured through such an approach.
- 2.15 Therefore, where appropriate to secure public benefits, the Council will consider assessing compliance with the policies in this plan across a number of linked sites. Multi-site proposals should be planned in a coordinated manner and demonstrate that there is a clear public benefit to this approach. They should have an agreed timeframe and means of delivery for the benefits, secured through a legal agreement.

Harnessing the benefits of growth

- 2.16 All development in Camden, large or small, wherever it is located should take place in accordance with all relevant policies of this Local Plan and other documents that form part of Camden's planning framework, in order to deliver the Council's vision and objectives for the borough. Harnessing the benefits of growth for Camden residents is a fundamental objective for the Council. Specific priorities include but are not limited to:
- securing self-contained housing as the priority use of the Local Plan. We need to ensure that the needs of our residents are met and that Camden remains a place accessible for all people to live in, including the provision of sufficient genuinely affordable housing. Please see policies H1- H11 on housing for further detail on our approach;
 - supporting businesses (particularly in the identified growth sectors) and job provision by providing or retaining suitable facilities to support businesses staying or expanding within Camden. Alongside this we will seek to deliver training, apprenticeships or qualification opportunities for our residents to allow them to be able to benefit from these jobs. Please see the policies E1 and E2 for more detail;
 - securing the infrastructure and services for the community that are needed to support the growing number of residents, workers and visitors. The identified programmes and projects, including for transport, utilities, education and health, emergency services and digital infrastructure are set out in the schedule in Appendix 1. Please see policy DM1 Delivering and monitoring the Local Plan for more detail on our approach to infrastructure provision; and

- ensuring that growth is delivered whilst protecting amenity and resilient communities is also fundamental. Camden's high level of amenity (the features of a place that contributes to its attractiveness and enjoyment as a place to live) is a major part of successfully promoting and managing growth in Camden. We will expect developments to avoid harmful effects on amenity of existing and future occupiers and nearby properties, or where possible, to take appropriate measures to minimise potential negative impacts. More detail and guidance on our approach to amenity is contained in policy D1 and D2.

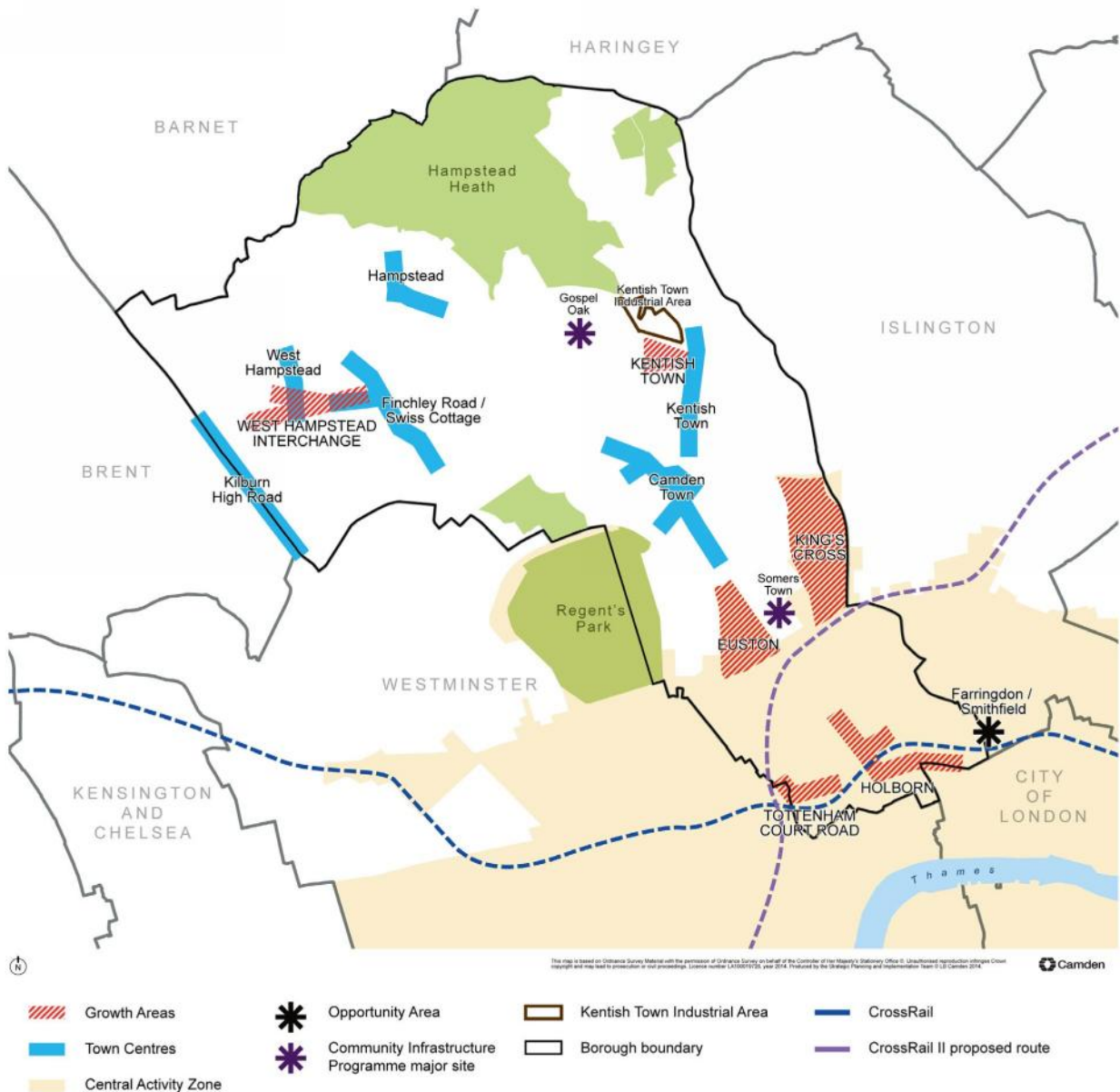


Location of growth

2.17

The Council's overall spatial strategy is illustrated on Map 1 – Key diagram. This shows the broad locations of Camden's growth areas, other highly accessible locations / town centres, main Community Investment Programme (CIP) development sites, major transport schemes and main open spaces.

Map 1: Key Diagram



Growth areas

2.18

A significant proportion of Camden’s growth up to 2031 is expected to be delivered in the five identified Growth areas of King’s Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange. These areas are identified in the London Plan as Opportunity Areas or Areas for Intensification as suitable for large-scale redevelopment or significant increases in jobs and homes, and are based around transport interchanges. The majority of these areas are within Central London and therefore their redevelopment will contribute towards the continued success of Central London and to London’s national and

international role, as well as providing opportunities to bring benefits across the borough and the local area.

- 2.19 The London Plan targets for Camden's growth areas are set out in the table below. The boundaries of the areas are as shown on the Local Plan Policies Map.

London Plan targets for Camden's growth areas

	Minimum homes 2011-2031	Indicative jobs 2011- 2031
Opportunity Areas		
King's Cross	1,900	25,000
Euston	2,800 - 3,800	7,700 - 14,100
Tottenham Court Road (part in Westminster)	500	5,000
Areas for Intensification		
Holborn	200	2,000
West Hampstead Interchange	800	100

(Source: Further Alterations to London Plan 2014)

Specific priorities for growth areas

- 2.20 The Council will expect development in the growth areas to meet the objectives of this plan and the identified priorities below. It should maximise site opportunities and the opportunities and benefits for the borough and the local area, in particular in terms of jobs, homes and facilities for the community, within the context of the full range of Camden's planning policies as set out in this plan and the Council's other planning documents.
- 2.21 Our Camden Site Allocations document and Euston Area Plan also identify significant development opportunities within the growth areas. The identified sites are expected to deliver a significant proportion of the increase in homes and jobs in the growth areas. These documents also set out Council's aspirations for the individual opportunity sites in more detail.
- 2.22 It is important to note that the growth areas are next to, and sometimes include, existing residential communities and heritage assets such as conservation areas. Development must therefore take account of its sensitive context. Further details on the specific growth areas and priorities are set out in more detail below

King's Cross

- 2.23 Kings Cross is the borough's largest development area and is rapidly taking shape as the high density mixed use redevelopment continues to bring life back to the area. Significant parts of the site have been developed, with more housing and commercial premises becoming occupied all the time. The new Camden Council offices, leisure centre and library opened in July 2014 and there is a creative buzz around the area thanks to the Central St Martin arts college and the forthcoming Google headquarters, together with high quality new public squares

and routes through the area. Camden continues to work with the surrounding residential communities to harness the benefits of this major redevelopment and work in partnership with landowners.

- 2.24 The Council's aspiration for King's Cross is to continue to secure the development of a high quality, successful, attractive, vibrant and safe places with a mix of uses, in particular offices, homes, retail, leisure and community facilities which:
- support and increases the borough's contribution to London's role as a world business, commercial and cultural centre;
 - integrate with surrounding areas and communities, economically, socially and physically;
 - create significant job and training opportunities for local people and contributes significantly to the regeneration of neighbouring communities;
 - help to meet the range of housing, education, social and healthcare needs in Camden and beyond;
 - maximise opportunities for walking, cycling and the use of public transport, to and through the area;
 - improve community safety and reduce opportunities for crime and antisocial behaviour;
 - protect and enhance features of historic and conservation importance; and
 - meet the highest feasible environmental standards.

Euston

- 2.25 Regeneration of Euston, one of London's major transport hubs is expected. The Euston Area Plan (EAP) has been jointly prepared by Camden Council, the Greater London Authority and Transport for London and provides a framework for change in the Euston area over the next 20 years. The EAP seeks to ensure that, whether or not the new high speed rail link (HS2) goes ahead, despite the Council's strong opposition, we can get the best possible future for the residents, businesses and visitors to Euston. Please see the Euston Area Plan for more detail on the joint aspirations for the area.

Tottenham Court Road

- 2.26 The Tottenham Court Road growth area includes parts of both Camden and Westminster and is centred around Tottenham Court Road station. Growth here is being supported by the transport enhancements as part of Crossrail due to open in 2017, in addition to upgrades to the northern line, ticket hall area. These works will see a significant increase in the number of passengers using this area and improvement of the public realm to facilitate an improved network of safe and attractive places and routes to successfully link the benefit to neighbouring area (particularly Holborn growth area, Covent Garden, Bloomsbury and Oxford Street is a high priorities). The London Plan expects a minimum of 500 new homes and 5000 new jobs to be delivered in the growth area. Based on the identified opportunity sites in the Sites Allocations document, the Council expects around 60% of homes and more than half of the jobs expected to be provided in private sector led schemes in Camden's part of the growth area. We will continue to work with Westminster and the West End Partnership to achieve our objectives and vision for this area.

2.27 All development within the Tottenham Court Road growth area should contribute to the Council's wider vision and objectives for this part of the borough. Our aspiration includes:

- a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street;
- an excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists, that successfully links to neighbouring areas (particularly the growth area at Holborn (see below), Covent Garden, Bloomsbury and Oxford Street) and reduces the dominance of traffic in the area, complementing the West End Project transport scheme;
- maximising densities compatible with local context, sustainable design principles and public transport capacity;
- development of the highest quality, as befits a historic area in the heart of London, which preserves local amenity and seeks to enhance and preserve the character and appearance of conservation areas; and
- remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces

Holborn

2.28 The area is predominantly commercial, with a small residential community focused around Holborn underground station. High Holborn, from New Oxford Street to Holborn Circus, and most of Kingsway are designated as Central London Frontages, recognising their role as a shopping and service centre for workers and residents. Some of the area and much of its immediate surroundings are designated as conservation area. The area lies close to the growth area at Tottenham Court Road (see above).

2.29 The Council's aspirations for the Holborn area include:

- provision of a mix of land uses, with offices and housing as the predominate uses; and
- provision of appropriate retail and service uses in the area's Central London Frontage, taking opportunities to introduce ground floor retail uses where the continuity of the frontage is currently broken;

improvements to the street environment, in particular:

- the pedestrian environment to and around Holborn Underground station;
- improved connections with the City of London, the Tottenham Court Road area and other neighbouring areas;
- making walking and 'way-finding' easier;
- the provision improved cycling facilities, particularly for visitors;
- working with partners to relieve congestion at Holborn Underground station;
- appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;
- high quality, sustainable design that respects its surroundings and preserves and enhances the area's historic environment; and
- improving community safety, including opportunities for crime and anti social behaviour.

West Hampstead Interchange

- 2.30 This is a significant public transport interchange with three stations (served by London Underground, London Overground and Thameslink) and a number of bus routes. Improving the interchange between the three stations is a fundamental objective for this area. The Council will continue to work with partners in the area including the established Neighbourhood Forum (for West Hampstead and Fortune Green) to investigate a range of solutions to improve movement around the area and ensure that development is coordinated to provide the best outcomes.
- 2.31 The Council expects improvements and supporting infrastructure at West Hampstead Interchange to include:
- a mix of uses, including substantial new housing, town centre, employment and community uses, and open space (with town centre uses located within Swiss Cottage town centre);
 - improved transport interchange accessibility and capacity and improved pedestrian and bicycle movement and routes;
 - a substantially improved street environment around transport facilities, including improved crossing and wider pavements; and
 - sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead.

Kentish Town Regis Road

- 2.32 The growth area is focused around the industrial area at Regis Road and currently is home to a variety of low density industrial and warehousing uses. Its redevelopment offers a significant opportunity to deliver a substantial increase in homes and jobs, as well as improve movement around and through the area, reconnecting communities. Redevelopment will only be considered as part of a comprehensive scheme. The Council will work in partnership with key landowners, the Neighbourhood Forum and other stakeholders to further investigate this opportunity. A planning framework to provide further detailed guidance on the development of the area should be prepared prior to any planning application.
- 2.33 The Council expects comprehensive development at Kentish Town Regis Road that provides a mix of uses, including housing, employment, community facilities and open space. Priorities for redevelopment include:
- a significant number of new homes including affordable homes and a mix of types, sizes and tenures;
 - a significant increase in the number of jobs provided in the area;
 - provision of appropriate employment space for identified growth sectors and small to medium enterprises and start-ups;
 - retaining existing industrial and warehouse businesses that support the CAZ and the borough;
 - retaining or re-providing the Council's Regis Road recycling centre; and
 - contributions towards training and apprenticeship opportunities.
- 2.34 The overall design of the area must:
- create and reinstate connections within the site, to the High Street and other parts of Kentish Town, and between the adjacent communities, in particular Gospel Oak;

- provide substantial new open space;
- secure public realm improvements, including at key entrances to the site;
- provide a car-free development, with parking only provided for disabled people and operational / servicing needs of businesses; and
- protect important local views of Hampstead Heath from the railway bridge.

Development should not prejudice any future development of the Murphy site to the north and should be designed to facilitate, and allow links to, any complementary future development of that site.



Farringdon / Smithfield

- 2.35 The Farringdon/Smithfield area, which covers parts of Islington, the City of London and the south east of Camden's Central London area at Hatton Garden and the Mount Pleasant site, is included in the London Plan as an Area for Intensification. The London Plan expects a minimum of 850 homes and 2500 jobs at this location between 2011 and 2031. The GLA, the City of London and Islington continue to work together to secure the best outcomes from the expected development, maximise the opportunities arising from the opening of Crossrail and securing improvement for the existing communities in the area.
- 2.36 Camden will continue to work with these partners, but as there are environmental constraints in Hatton Garden due to its unique character and conservation area status, the amount of development taking place in this part of Farringdon / Smithfield is expected to be limited. Therefore, this location has not been included as one of Camden's main growth areas.

Other highly accessible areas

- 2.37 Significant elements of Camden's growth will be delivered in highly accessible locations outside the growth areas identified above. Therefore the Council will promote appropriate development in the areas of:
- Central London;

- the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, including appropriate edge of centre locations; and
- Camden's Central London area and the identified town centres, together with locations on the edge of these centres are highly accessible by public transport. They are therefore considered to be generally suitable for a range of land uses, including those that attract a large number of journeys and for high density development that will help deliver growth in Camden.

2.38 The Council will generally expect larger developments in the highly accessible areas to include a mix of uses. However, it is important that all development in these locations is of a size and nature compatible with its site and the character of its surroundings and the wider area. Please see policy H2 for more detail on our approach to mixed use development.

2.39 Camden's highly accessible areas often include, or are adjacent to, residential communities and conservation areas and other heritage assets. Development in these locations must therefore take into account the full range of relevant Council policies and objectives, in particular those on amenity, design and heritage, sustainability, community safety, open space and transport.

2.40 The main development opportunities within the highly accessible areas are identified in the Camden Site Allocations and Fitzrovia Area Action Plan documents which also set out guidance on their future development.

2.41 The priorities for Central London and the Town Centres are set out below.

Central London

2.42 Central London is the focus of activity in nation's capital and its unique role, character and mix of uses plays an important part in providing the vibrancy, diversity and identity that makes the borough such a popular place. A large part of London's Central Activities Zone (CAZ) falls within Camden and is a major business and employment centre and the main focus of Camden's economy. It contains a significant proportion of the borough's office floorspace, a variety of shopping areas, from neighbourhood centres to specialist retail locations like Covent Garden, and is home to many other uses, including legal, health and professional services, food, drink and entertainment and cultural and tourism uses. It has excellent public transport links, which will be enhanced through the opening of Crossrail in 2018. Integral to its character is the significant residential population adding to its life and diversity and supporting economic and other functions.

2.43 The attractions of Camden's Central London area mean that development here is expected to take place both in the growth areas identified and on other Central London sites outside them.

2.44 We will continue to work with Westminster and the West End Partnership to achieve our objectives and vision for this area.

2.45 The Council recognises the unique role, character and challenges of Central London in particular in balancing its economic, social and cultural role and will support and promote the area as a successful and vibrant part of the capital to live in, work in and visit. We will:

- support Central London as a focus for Camden’s future growth in homes (including affordable housing), offices, shops, hotels and other uses and ensure adequate infrastructure, including transport, utilities and digital, is in place to support this growth;
- support the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the ‘knowledge quarter’;
- seek to ensure that development contributes to London’s economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;
- support residential communities within Central London by protecting amenity, promoting improved community safety and supporting community facilities;
- preserve and enhance the area’s historic environment;
- promote and protect areas of specialist activity, such as the Museum Street area and Hatton Garden and take into account the specific identity of the areas within Central London when taking decisions on planning applications and in relevant initiatives and works;
- continue to designate Central London as a Clear Zone Region and seek to improve the quality of the area’s streets and places, the connections between them and the ease of movement into, and through, the area;
- manage the location and concentration of food, drink and entertainment uses and their impact; and
- support development in accordance with the guidance contained in the Sites Allocation document and Fitzrovia Area Action Plan.

Town Centres

- 2.46 The identified town centres are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. They are considered to be suitable for higher density development provided that they are of high quality, contribute to the character of the area and deliver the key priorities of the Plan.
- 2.47 Camden Town is expected to be the location of a significant amount of additional shop floorspace over the lifetime of the Local Plan. Hampstead town centre is not considered to be highly accessible by public transport and therefore significant growth is not expected in this area. Please see policy TC1 for the Council’s strategy for Camden’s town centres and shops, including the provision of additional retail floorspace.

Community Investment Programme

- 2.48 A significant element of Camden’s expected growth will take place outside of the identified growth areas and highly accessible areas through the Council’s Community Investment Programme (CIP). The programme is Camden’s response to the extensive cuts of government capital funding that continue to affect the borough. This is at a time when significant investment is required to improve Camden’s schools, children’s centres, community facilities and the Council’s housing stock. The CIP is ensuring that the Council makes the best use of its property assets through regenerating sites and through selling sites that are now surplus to requirements because they are no longer suitable, underused

or expensive to maintain. The CIP is generating funds that would not otherwise be available to reinvest into homes, schools and community facilities for our residents and is making a significant contribution to the Council's Camden Plan.

- 2.49 The CIP is delivering in locations across Camden. It is a good example of where a mixed use and multi site approach is delivering growth and where the benefits of the growth are being harnessed for the good of Camden's residents. The CIP is a long-term programme projected to deliver up to 3,050 new homes, including both new council housing for rent (450) and replacement council rented accommodation (650), new shared ownership homes (300) and new and replacement private homes (1,650). The CIP will assist the Council in meeting identified housing need and London Plan targets.



- 2.50 The CIP is a key component of how we are investing in our communities and improving facilities for residents to ensure they have brighter futures. CIP is investing £117m by 2016/17 in 53 schools and children's centres, improving educational facilities across the borough and creating 420 much needed school places in the north-west of the borough. The CIP is also committed to deliver 9000 sqm of improved community facilities and spaces, provide accommodation for new adult social care services and ensure homes built are sustainable and energy efficient. The CIP is involving local people in changes to their area, providing opportunities for residents to influence proposals and the designs of developments.
- 2.51 The programme is also creating local employment opportunities by promoting construction contracts to local small businesses and securing apprenticeships and work experience placements, ensuring local people are equipped with the skills needed to move forward into employment.
- 2.52 Schemes are worked up in consultation with the residents and stakeholders. A specific example of this is the 1-30 Camden Street and 67-72 Plender Street Council CIP scheme. This scheme has planning permission for the redevelopment of a former community centre, sports pitch, changing rooms,

single storey shops and garages to provide an improved community centre and changing rooms, new open space, 31 market homes and 14 affordable homes, together with replacement shops.

- 2.53 Two of the spatial areas of focus of the CIP are estate and area regeneration work in Gospel Oak and Somers Town. Priorities for these areas are set out below.

Gospel Oak

- 2.54 Gospel Oak, a predominately residential area comprised of six core estates in the north of the borough. It has been identified as a priority area due to high levels of relative deprivation and significant housing challenges. Poor quality design, overcrowding and the age of buildings means that much of the housing stock is in need of significant investment in order to meet the Decent Homes Standard.

- 2.55 The Council is developing in conjunction with the community a strategic framework for the area, which will set out the overarching principles for the regeneration of Gospel Oak and guide investment into the area over the short, medium and long-term.

- 2.56 Through community engagement with local residents, businesses and community groups, the following priorities for Gospel Oak have been identified:

- new and improved housing;
- improved community safety through better street design;
- greater opportunities for jobs and training;
- support for local businesses and new enterprises;
- regeneration of Queen's Crescent through improvements to the street environment and a better mix of market/retail offer;
- greater legibility throughout the area;
- better community facilities, that are coordinated and tailored to community needs;
- new and improved quality open spaces; and
- primary school expansion to meet the needs of a growing population if required.

- 2.57 The regeneration will focus primarily on improving the quality of housing stock but also offers the potential to create an improved physical environment and enhanced connectivity as well as address a number of social and economic issues. Numerous opportunities have been identified to improve conditions and local facilities. The redevelopment of Bacton Low Rise Estate has already commenced and a range of options are currently being explored with the local community for Waxham and Ludham and Wendling estates.

Somers Town

- 2.58 Located between the two major growth areas of King's Cross and Euston, Somers Town is surrounded by change and there is a need to ensure that it the benefits of growth are harnessed for the local area and community. The area is relatively deprived and has a high proportion of council tenants in accommodation in need of investment, above average overcrowded housing and community facilities in need of investment, such as Edith Neville School . Given Camden's substantial land ownership and the existing distribution of community facilities and service provision in the area, the Somers Town programme has

been drawn up to establish whether greater benefit to the community and the Council could be derived from looking beyond the individual site boundaries and at the area as a whole.

2.59 Through community engagement with local residents, businesses and community groups, Camden have been working with the community to draw up agreed reinvestment priorities for the area (spring 2013). All current and future projects can and should be designed to deliver against these agreed priorities:

- Housing
- Getting about
- Education and community facilities
- Open space
- Community safety
- Jobs and training

2.60 By looking at the area strategically as a whole, the programme enables the potential benefits of providing the opportunity to:

- provide resources to meet investment need of existing Council homes and improving the environment for tenants and leaseholders of the Council's Housing estates;
- consider tenure and housing mix strategically across the area;
- consider the spaces between the buildings and how they work together to create a cohesive, attractive and functional place;
- cross subsidise development from one site to another ensuring reinvestment across the area to meet agreed priorities; and
- engage in a strategic dialogue with the community in relation to issues that affect the wider area.

3. Meeting Housing Needs

Maximising housing supply

- 3.1 Policies in the section set out targets for the overall numbers of additional homes and additional affordable homes we expect to be built in the borough over the Plan period, and the mix of sizes and types of homes that are needed for particular groups of people. However, a wider range of considerations feed into housing development, including sustainability and responsiveness to climate change, the standard of design, layout and construction, integration with the surrounding area, residential amenity, contribution to the character of the neighbourhood, health, well-being and community safety, and the availability of local facilities and public transport. The Council will not sacrifice housing quality in order to maximise overall housing supply, and seeks a wide variety of high quality homes suitable for Camden's existing and future households, as set out in policy H6.
- 3.2 Housing proposals should be designed having regard to:
- relevant policies throughout the Plan, particularly Design and Heritage and Protecting amenity;
 - Camden Planning Guidance, particularly Camden Planning Guidance 1: Design supplementary document and Camden Planning Guidance 2: Housing supplementary documents;
 - Supplementary Planning Guidance issued by the Mayor of London; and
 - Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.
- 3.3 Most policies in this section are preceded by guidance on the scope of the policy. This guidance should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.
- 3.4 This section of the Plan relates to all forms of housing where people live long-term, including:
- self-contained houses and flats;
 - live/ work units (homes with a dedicated work area) – we will treat them as self-contained homes for the purposes of plan policy;
 - houses and flats shared by 3 or more occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens;
 - nursing homes, care homes and parts of hospitals where people live long-term, such as nurses' accommodation;
 - other accommodation with shared facilities where people live long-term, such as hostels and student halls; and
 - residential accommodation that is ancillary to another use, such as a living area attached to a business and used by caretakers or other staff.
- 3.5 Accommodation where people stay for short periods is covered elsewhere in the Plan. Specifically:
- hospitals and care facilities where patients and staff are only present on a temporary or working-hours basis are covered by Policy C2; and
 - hotels, serviced apartments and hostels aimed at tourists and backpackers are covered by Policy E3.

Policy H1 Maximising housing supply

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,100 additional homes from 2015/16 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;
- b. working to return vacant homes to use and ensure that new homes are occupied;
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document;
- d. expecting the maximum appropriate provision of housing on sites that are underused or vacant; and
- e. where other uses are needed on the site, expecting development for a mix of uses including self-contained housing where appropriate.

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

London Plan housing targets

- 3.6 Based on the London Strategic Housing Land Availability Assessment (SHLAA) 2013, the draft Further Alterations to the London Plan set out a minimum target of 42,000 additional homes per year across London up to 2025, and monitoring benchmarks for each borough. Boroughs are advised to set Local Plan targets on the basis of objective assessments of local housing needs, taking account of London's strategic housing needs and drawing on the monitoring benchmarks in the Further Alterations, rolling these forward beyond 2025 where necessary.
- 3.7 The monitoring benchmark in the Further Alterations for Camden is 8,892 all homes from 2015-2025, or 889 per annum. The London SHLAA derived these monitoring benchmarks from assessments of different types of supply, including student housing and vacant homes returning to use (set out in SHLAA table 3.16). On the basis of the SHLAA, the components of Camden's monitoring benchmark are as follows:
- 858 per year as conventional supply in the forms of homes added to the total stock – this includes the following two components;
 - 742 additional self-contained homes per year, made up of flats and houses (in Use Class C3) that have been newly built, converted from another use, or formed from a net increase in homes in an existing building;
 - 115 additional homes per year that are not self-contained, made up of all types of homes that share common facilities or services, but the London SHLAA indicates that they are predominantly delivered as student housing; and

- 32 homes per year returning to use from long-term vacancy make up a third component that is not part of the conventional supply.

Camden's housing needs and targets

- 3.8 The draft Further Alterations to the London Plan indicate that the requirement for additional homes across London is 49,000 per year. This has been calculated by the London Strategic Housing Market Assessment 2013 on the basis of household projections from 2011 to 2035 together with existing housing needs and further needs arising from undersupply of housing from 2011 to 2015.
- 3.9 An objective assessment of housing needs for Camden has been produced on the same basis, and forms our target for housing supply. Camden's need is 1,073 additional homes per year, which is equivalent to a rounded target of 16,100 over the Plan period. This overall need relates to homes of all types including housing for specific groups such as students and older people.
- 3.10 The final report of the Mayor's Academic Forum in 2014 estimated that the need for additional places in dedicated student housing in London from 2011/12 to 2025/26 at 2,500 to 3,100 per year. The 2011 Census indicated that Camden was the term-time home of 4.7% of London's full time students aged 18 and over. Data on students registered at London's publicly funded higher education institutions in 2012/13 indicated that Camden's resident students were 6.6% of the London total. On the basis of the mid-point of these figures, we estimate the requirement for additional student housing over the Plan period to be 160 places per year, or 2,400 places in total. This forms our student housing target set out in policy H9.
- 3.11 Camden's target for development of new self-contained homes is based on the London SHLAA figure of 742 per year, or 11,130 over the Plan period. Camden's target for returning vacant homes to use is based on the London Plan figure of 32 per year or 480 over the Plan period. We anticipate that the remaining 4,500 homes required to meet Camden's overall target will be made up partly of further self-contained homes for general needs, accommodation to meet Camden's need for additional student housing, and other specialist accommodation such as homes for older people and vulnerable people.
- 3.12 The Council produces an Authority Monitoring Report (AMR) each year which separately monitors net additions to self-contained homes, student housing, other non-self-contained homes and long-term vacant homes returned to use. The AMR also contains a housing trajectory which shows how we will continue to deliver self-contained homes and non-self-contained homes and measures Camden's anticipated performance against the Further Alterations monitoring benchmark (excluding vacant homes returning to use).
- 3.13 The 2014 AMR indicates that deliverable sites are in place to provide more than 6,500 homes from 2015/16 to 2019/20, exceeding Camden's own overall housing target of 1,073 per year. Over the first 10 years of the Plan period, the trajectory indicates that developable sites are available to deliver an average of around 900 additional homes per year, which would meet the London Plan's monitoring benchmark for conventional supply (858 additional homes per year) but would not fully meet Camden's own housing target. Over the entire plan period average delivery is estimated at just under 800 additional homes per year. We anticipate that this shortfall later in the Plan period will be met by delivery of additional

housing in the Kentish Town Growth Area and the Euston Growth Area, together with additional student housing on sites identified in our development plan documents. These additional sources of supply will be included in future housing trajectories.



Maximising housing and the priority for self-contained homes

- 3.14 Further Alterations to the London Plan indicate that the number of additional homes required across London exceeds the identified capacity for additional homes by as many as 7,000 per year. Meeting needs in Camden will also be challenging, with a gap of almost 200 homes per year between our housing need (based on household projections, existing needs and past shortfalls) and our housing capacity (as assessed for the London Plan's monitoring benchmark).
- 3.15 Self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy and amenity. They generally have the space and flexibility to provide for people whether they are young or old, single people (often sharing), couples or families, and disabled people or people who need a carer for certain activities or overnight. Housing with shared facilities is generally aimed at a particular group or household type (e.g. students or single people), provides less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles.
- 3.16 As indicated in the London SHLAA, most new non-self-contained housing is delivered as student housing. The non-self-contained element of Camden's monitoring benchmark represents development expected to be delivered in the first five years of the Plan period, and involves additional student housing provision minus a reduction in the number of hostel places on the basis of schemes with planning permission. Camden's Site Allocations Document 2013 and the Fitzrovia Area Action Plan also designate a further six sites where student housing could be developed, in most cases as part of a mixed-use

scheme. Taking these sources of supply together we consider that there are sufficient developable sites identified to meet Camden's need for 2,400 additional places in student housing across the Plan period.

- 3.17 Further Alterations to the London Plan indicate that Local Plans should address student housing requirements without compromising capacity for conventional homes. Student housing has become an increasingly popular development option for sites that could otherwise provide self-contained housing due to increasing student rents, low vacancy rates and the absence of any conventional affordable housing requirements. From 1999-2012, the Further Alterations indicate that 57% of student housing was delivered in Islington (18.0%), Tower Hamlets (16.2%), Southwark (11.6%) and Camden (11.0%). The only other borough providing more than 5% of the total was Hillingdon (9.1%). The 2011 Census indicated that over 25,000 full-time students aged 18 or over were resident in Camden during term-time, or 11.4% of the usual resident population. Consequently, Further Alterations to the London Plan encourage a more dispersed distribution of future provision.
- 3.18 Given these concerns we have specifically identified self-contained housing as the Plan's priority land-use, and will particularly seek to ensure that there is sufficient land available to meet Camden's need for additional self-contained homes.

Ensuring homes are occupied

- 3.19 In October 2013, almost 1,300 homes in Camden had been vacant for 6-months or more, approximately 1.3% of the borough's housing stock, compared with 0.6% across London. An element of vacancy in the housing stock is inevitable, reflecting homes in the process of renovation or changing hands. The 2013 London Strategic Housing Land Availability Assessment has derived the London Plan targets on the basis that the long-term vacancy rate should not exceed 0.75% of the housing stock.
- 3.20 Further Alterations to the London Plan set a monitoring target for 32 long-term vacant homes in Camden to return to use each year. Given the pressure on the housing stock, returning vacant homes to use is a high priority, and the Council will seek to exceed the London Plan monitoring target. The Council currently discourages long-term vacancies by charging the maximum rate of 150% Council Tax on homes vacant for 2 years or more. We also employ empty property officers to work with owners, ensuring homes are in a suitable condition for occupation and matching them up with tenants. The Council will seek to apply Local Plan policies flexibly where this is appropriate to enable refurbishment of a property that would otherwise remain vacant.
- 3.21 There is some evidence that an increasing proportion of homes in and around Central London are bought by investors who do not live in them or rent them out. The Council is exploring ways to ensure that investment homes are made available for occupation, for example by encouraging new owners to use our pilot local letting agency Camden Homes. More details of measures to encourage occupation and discourage vacancy will be included in Camden Planning Guidance 2: Housing supplementary document where appropriate.

Resisting alternative development of identified housing sites

- 3.22 Where possible, we have identified underused sites that are suitable for additional self-contained housing or another form of housing in the Camden Site Allocations 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 alternative development of other sites that have an existing consent for self-contained housing or another form of housing (an existing consent is one that has not expired, or remains effective because development has been started).
- 3.23 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 provided that they include an appropriate mix of dwelling-sizes and types in accordance with other policies including H4, H7 and H8. Further information on our approach to live-work premises is provided in the section of the Plan dealing with the economy and jobs.

Making the best use of sites to deliver housing

- 3.24 Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for housing unless:
- the Plan seeks to protect existing uses on site, such as business premises, community uses and shops;
 - the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of Central London;
 - the site is identified for another use in the Camden Site Allocations document;
- or
- it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable.
- 3.25 Where non-residential uses are required on the site, the Council will seek mixed-use schemes including the maximum appropriate provision of housing. More details of our approach to the inclusion of housing in mixed-use developments are set out in policy H2.
- 3.26 The London Plan's Sustainable Residential Quality density matrix has been developed as a tool to help boroughs seek the maximum appropriate provision of housing on each site while maintaining residential quality, taking account of public transport accessibility, respecting local context and ensuring an appropriate mix of homes of different sizes. To ensure we make the best use of sites for housing, we use the London Plan's density matrix (Table 3.2) to seek the maximum housing density appropriate to the site (i.e. the most homes or rooms that can appropriately be delivered in a given site area).

3.27 Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities should be towards the higher end of the appropriate density range, and should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare. The density matrix should be seen as a guide rather than a prescriptive tool, and it may be appropriate to exceed the relevant density range on certain sites where this is justified by context and form of the development.

3.28 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.

Flexible implementation

3.29 Despite the financial crisis of 2007-08, house prices in Camden had recovered to 2007 levels by mid-2010 and have continued to rise. The Council is currently receiving applications for a high level of residential development, with permission granted in 2013-14 for over 850 additional self-contained homes. This suggests that developers expect continued increases in Camden's house prices.

3.30 However, the viability of housing development has not fully recovered from the financial crisis. Some sites are constrained by acquisition prices that could not now be supported, lending to developers and to purchasers is more restricted than previously, lenders are less willing to take risks and both lenders and developers expect financial viability assessments to indicate higher profit levels than previously. There is also uncertainty about the future, with expectations that interest rates will rise, concerns about the impact of a rate rise on borrowers, and concerns that current economic growth is fuelled by unsustainable debt.

3.31 Given these uncertainties, there is a need to monitor the supply of housing very closely, and make adjustments to the way we implement our Local Plan policies to ensure that our targets for additional homes are met. If overall housing supply appears to be threatened by economic conditions, there are a number of areas of flexibility in the Council's policy approach that will enable us to tailor our objectives to the particular circumstances of each proposal with a view to maximising delivery. These include:

- varying the proportion of market and affordable housing;
- varying the split between social-affordable rented housing and intermediate affordable housing;
- positively considering different forms of intermediate affordable housing to take advantage of the funding and credit that is available;
- varying the range of home sizes sought, particularly amongst market housing; and
- reviewing the range of Section 106 requirements sought to maintain viability.

- 3.32 In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden's overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and the Council's other Local Plan objectives.
- 3.33 In seeking to secure the future supply of additional housing, we will seek to work in partnership with many other organisations and agencies involved in the development and funding of housing and affordable housing. These will include our developers, landowners and private landlords, Housing Associations and other affordable housing providers, the Mayor and GLA and other local authorities – particularly councils in Central and North London, government departments and government agencies.

Maximising the supply of self-contained housing from mixed use schemes

- 3.34 Policy H2 applies to all new build development and extensions involving a significant floorspace increase. Policy H2 also applies to all non-residential uses, including hotels and other visitor accommodation and non-residential institutions. However, a mix of uses may not be sought in all circumstances, and criteria are included in the policy to guide whether a mix should be sought.
- 3.35 Policy H2 specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan set out in policy H1.

Policy H2 Maximising the supply of self-contained housing from mixed-use schemes

The Council will seek to exceed the target for self-contained homes by expecting non-residential development to provide a mix of uses including the maximum appropriate provision of self-contained housing.

We will particularly expect sites in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road to be developed for a mix of uses including self-contained housing. In these locations, where development involves additional floorspace of more than 200 sqm (GEA), we will require up to 50% of all additional floorspace to be self-contained housing.

We will require self-contained housing to be provided on site, particularly where 1,000sqm (GEA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing on is not practical, we will seek provision of self-contained housing on an alternative site nearby, or exceptionally a payment-in-lieu.

In considering whether to seek a mix of uses including self-contained housing, whether self-contained housing should be provided on site, the most appropriate mix of uses, and the scale and nature of any provision of self-contained housing and other uses, the Council will take into account:

- a. the character of the development, the site and the area;
- b. site size, and constraints on including a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. the need to add to community safety by providing an active street frontage and natural surveillance;
- e. whether self-contained housing would be compatible with the character of the proposed non-residential use;
- f. the extent of any additional floorspace needed for an existing user;
- g. whether the development is publicly funded;
- h. the economics and financial viability of the development including any particular costs associated with it; and

- i. whether an alternative approach could better meet the objectives of this policy and the Local Plan.
-

- 3.36 Where it is not appropriate to develop a site entirely for housing, securing housing as part of a mixed-use scheme is another way of meeting some of our housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities. Developing a mix of uses on individual sites and across an area can also be beneficial in other ways, such as:
- reducing the need to travel between homes, jobs and services;
 - increasing community safety and security by providing a range of activities that attract people at different times during the day and evening;
 - contributing to the creation of areas that are diverse, distinctive and attractive; and
 - allowing an efficient use of land, with housing developed above those uses which benefit from direct ground floor access or a street-level frontage, such as shops.
- 3.37 Much of the borough already has a well-established mixed-use character. To support and extend this, the Council will expect non-residential development throughout the borough to provide a mix of uses including the maximum appropriate contribution to self-contained housing.
- 3.38 Camden's Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road are the parts of the borough which have the best access to public transport, the best potential for a mix of uses, and the best prospect for the development of housing above active street frontages. Additional housing in these locations will help provide activity and surveillance when businesses are closed, and support shops, services and local facilities. Therefore, the Council will particularly expect development schemes in Central London and our larger town centres to provide a mix of uses, and will seek to negotiate up to half of all additional floorspace as housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.
- 3.39 On the basis of the floorspace and ancillary space required to create a single self-contained home and a single commercial unit within a mixed-use development, the Council considers that a development adding more than 200 sqm (gross) of floorspace is sufficient to provide a mix of uses, including a contribution to the supply of housing. Housing provided as part of a mixed use scheme should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.
- 3.40 As indicated in paragraphs 3.14 to 3.18, the Council is concerned that development of student housing will limit the availability of sites for conventional homes in Camden, and consequently has specifically identified permanent self-contained housing as the priority land-use of the Local Plan. In accordance with this priority, the Council will apply policy H2 to seek permanent self-contained housing (in Use Class C3). However, where education development is proposed to serve an institution supported by the Higher Education Funding Council for England, as an alternative to seeking self-contained housing, the Council may support a mixed-use development including student housing that serves the

same institution, subject to the student housing satisfying the requirements of policy H9.

Off-site provision and payments in lieu

- 3.41 Inclusion of self-contained housing as part of a mixed use development offers the best prospect for creating a complementary range of activities across an area with continuous activity and natural surveillance. Where development adds 1,000 sqm (GEA) or more floorspace, the Council considers that it will generally be possible to provide a significant addition to the non-residential area whilst also accommodating a number of homes and the circulation space needed to serve them.



- 3.42 However, there may be circumstances (even when the additional floorspace is 1,000 sqm or more) where the provision of self-contained housing is appropriate but cannot practically be achieved on-site (for example where the entire floorspace is needed for an existing user or another activity that is a high priority in the area). When the Council considers proposals for off-site provision, the Council will take into account all related sites when assessing how much self-contained housing is required. The Council will seek additional housing floorspace to match the net addition to non-residential floorspace across all sites, taking into account any non-residential floorspace removed in conjunction with the off-site housing contribution (but also seeking replacement of any existing housing lost as part of each development).
- 3.43 Where the Council accepts that off-site provision is appropriate, we will seek development of the self-contained housing on an alternative site nearby, secured by a planning obligation. Given the intense competition for sites in Camden, the Council will normally expect the Planning obligation to ensure delivery of the self-contained housing by specifying the anticipated delivery site (or sites).

- 3.44 Alternative sites must be in the borough, and will initially be sought in the same ward as the development. Where the development is south of Euston Road, and no sites are available in the same ward, the Council may consider alternative sites south of Euston Road. Where the development is north of Euston Road, if no sites are available in the same ward, the Council will subsequently seek sites in an adjacent ward to the north of Euston Road, and finally seek the nearest appropriate site to the north of Euston Road. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.
- 3.45 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for self-contained housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation.
- 3.46 More detailed information regarding the calculation of off-site provision and payments in lieu is provided in our Camden Planning Guidance 2: Housing supplementary document.

Achieving an appropriate mix of uses

- 3.47 Policy H2 provides a set of criteria to help us consider the appropriate mix of uses for a site, and whether self-contained housing should be provided on the site or elsewhere. These will be used to consider proposals throughout the borough, including proposals in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road. Details of how these criteria will be applied are set out in Camden Planning Guidance 2: Housing supplementary document (including the assessment of financial viability), but a number of key considerations are set out below.
- 3.48 The character of a development, site and area (including site size) will influence whether it can accommodate housing or the separate access or circulation spaces needed to accommodate multiple uses. Factors to be considered include whether existing buildings need to be retained on site (e.g. heritage assets) and whether other activities or buildings in the area would prevent an acceptable standard of residential amenity from being achieved. Residential or non-residential uses may need to be introduced into an area to add to community safety, for example by adding to the diversity and vitality of streets where there is limited activity at certain times of the day or week, or ensuring that street activity can be seen by nearby residents.
- 3.49 In some areas the need to meet the space requirements of a particular activity or user may outweigh the priority given to housing. The Council places a high priority on ensuring premises are available to sustain Hatton Garden's nationally and internationally important cluster of jewellery manufacture and trading (see also policies E1 and E2). Many other Central London activities have a national and international function and make major contributions to Camden's economy, such as the Wellcome Institute and the various components of the University of London, and their requirements may be foremost in particular locations.
- 3.50 Many non-residential uses can be located adjacent or below residential uses without difficulty. By definition, business uses within Use Class B1 should be capable of operating in residential areas without having an adverse impact on

residential amenity. Amenity may also be protected by design features and planning conditions (for example, requiring attenuation of noise/ vibration or limiting operating hours). However, we will consider whether proposed uses have particular requirements that would limit the potential for including housing on-site. For example hospitals and medical institutions may require 24 hour operation, privacy or controlled environments.

- 3.51 The Council is committed to promoting and facilitating growth, and we will seek to ensure that the operation of policy H2 encourages deliverable development and helps growth to take place. We will take into account the space needs of existing users and way the development will be financed. Where a development is publicly funded, we will consider whether this would prevent the developer from funding the supply of housing. Where a commercial development is proposed, we will consider whether a viable development requires a particular amount or layout of commercial space. In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability, and may expect submission of a financial viability appraisal to justify the mix proposed, taking account of an agreed benchmark value for the site and all costs and returns associated with residential and non-residential elements of the scheme. In appropriate circumstances, the Council may also seek an independent verification of the appraisal funded by the developer.
- 3.52 The Council will positively consider alternative approaches that can better deliver a supply of land for self-contained housing, for example making a site available for housing development by another organisation such as the Council or a Housing Association. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver a mixed-use scheme containing housing e.g. the impact of providing a new station entrance to promote public transport.

Affordable housing in mixed-use schemes

- 3.53 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought in appropriate circumstances. Policy H4 sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect. Where a proposal in Central London (or the identified town centres) adds 1,000 sqm or more of non-residential floorspace, we will also seek a similar amount of self-contained housing. We generally consider that 1,000 sqm of housing has capacity for 10-or-more homes, so we would also expect the provision of affordable housing.
- 3.54 As indicated in policy H4 and supporting paragraphs, where a mixed-use development has a residential element with capacity for 10 or more homes alongside an addition of 1,000 sqm or more to non-residential floorspace, the Council's affordable housing target is 50% of the total addition to housing floorspace. The sliding scale approach to sites with capacity for 10 to 30 dwellings will not apply to these larger mixed use schemes, as the additional non-residential floorspace is considered to augment the viability of the development. However, where a mixed-use development adds less than 1,000 sqm of non-residential floorspace and also has a residential element with capacity for 10 or more additional homes, the development will be predominantly residential, and the sliding scale approach will apply.

Protecting existing homes

- 3.55 Policy H3 seeks to protect all housing floorspace where people live long-term. It also seeks to protect individual self-contained houses and flats (in Use Class C3) and individual houses and flats shared by a 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).
- 3.56 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:
- affordable housing floorspace is protected by policy H5;
 - housing for older people, homeless people and vulnerable people is protected by policy H8;
 - student housing is protected by policy H9; and
 - other housing where occupiers do not live as a family but share facilities such as toilets, bathrooms and kitchens (such as bedsits) is protected by policy H10.

Policy H3 Protecting existing homes

The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

- a. resisting 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 ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use.
- b. protecting permanent housing from conversion to short-stay accommodation intended for occupation for periods of less than 90 days; and
- c. resisting development 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 existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or
 - enable sub-standard units to be enlarged to meet residential space standards.

Exceptionally, the Council may support development that involves a limited loss of residential floorspace where this provides for the expansion of existing health premises to meet local needs.

Loss of residential floorspace

- 3.57 As indicated in the paragraphs accompanying policy H1, meeting housing needs in Camden and across London will be challenging. To tackle Camden's housing needs, the Council aims to maximise the supply of additional homes and regards self-contained housing as the priority land-use of the Local Plan. In tandem with

these objectives the Council also aims to protect all types of existing housing against development that would involve a net loss of residential floorspace.

3.58 The types of housing we aim to protect include:

- residential floorspace that is ancillary to another use (e.g. staff accommodation above a shop or pub) where the proposed change involves development and is subject to planning control; and
- floorspace at nursing homes, care homes or hospitals where people live long-term such as accommodation for nurses and for patients who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms/ toilets, and associated circulation space).

3.59 Proposals we will resist include:

- reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property; and
- proposals that would involve a permanent change of residential floorspace from long-term accommodation to visitor accommodation let for periods of less than 90 days. In London, such a change is currently development as a consequence of the Greater London Council (General Powers) Act 1973. The Government is currently seeking to amend this legislation, but has not yet indicated what provisions will be available to resist such changes in future.

3.60 In some circumstances, it may be appropriate for residential floorspace to be re-provided on an alternative site. We will have regard to policy H2 (mixed-use development) when considering whether housing should be retained on-site or re-provided off-site.



Net loss of two or more homes

3.61 The starting point for housing targets is the projected growth in the number of households, and the needs of these households can only be met by net additions to housing numbers. Every home that is lost through redevelopment or conversion is a home that needs to be replaced. Since March 2008, approximately 50 dwellings a year have been lost through development involving a net loss of homes. Around 40% were lost in developments involving loss of a single home, many of which combined two flats to create a single dwelling. The Council therefore aims to ensure that existing dwellings will continue to be available to meet housing needs and that the overall supply of housing will not be compromised by developments involving a net loss. 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.

- 3.62 However, the Council also recognises that there are situations where the loss of individual homes may be justified. Policy H3 indicates that such losses may be acceptable in four situations:
- 3.63 To combine two dwellings into a single dwelling (a net loss of one home). Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of flats or apartments, such a change may not constitute development. However, the Council will resist the incremental loss of homes through subsequent applications to combine further homes within the same building or site.
- 3.64 To combine two or more dwellings to create an additional large dwelling (3 or more bedrooms) in the following wards with a low proportion of large dwellings – Bloomsbury, King's Cross, Holborn and Covent Garden and Kilburn. The 2011 Census shows that the average number of bedrooms per household in these wards is less than 2 (compared with 2.1 across the borough), and less than 25% of households have five or more rooms overall (compared with 31.6% across Camden).
- 3.65 We may permit proposals to combine two or more dwellings to create a large affordable home (3 or more bedrooms). The existing stock of affordable housing (particularly Council housing) is heavily skewed to one and two-bedroom homes. The 2011 Census indicates that over 20% of households in social rented housing are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 12.5% across all tenures.
- 3.66 We may permit proposals to combine two or more dwellings where the existing dwellings are 20% or more below residential space standards, provided the loss of dwellings is no greater than needed to meet the standards. Residential space standards are set out in The London Plan 2011. The government is currently consulting on proposals for a nationally described space standard, and the Council will consider adopting this if it is introduced.
- 3.67 For the purposes of policy H3 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), and will resist the loss of two or more small houses in multiple occupation. This reflects the freedom provided in legislation for changes between these uses without a planning application.
- 3.68 Camden Planning Guidance 2: Housing supplementary document provides further information about how we will apply policy H3.

Expansion of health premises

- 3.69 Many health premises such as GP surgeries are located between or below homes, often in appropriate locations where they are easily accessible to the people that need them. Expansion of these premises to meet changing local needs may not be possible without the loss of some residential floorspace. The Council may therefore support the loss of residential floorspace in these circumstances provided that the need for expansion of the health premises is demonstrated, and the loss of floorspace is no greater than is necessary.

Maximising the supply of affordable housing

- 3.70 Policy H4 applies directly to the following types of housing:
- self-contained houses and flats (Use Class C3);
 - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class, we will treat them as Use Class C3 when we apply Local Plan policies); and
 - houses and flats shared by a 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4).
- 3.71 The principles of policy H4 also apply to other types of housing, although the mechanics of considering and securing affordable housing provision may vary. In particular, we will be guided by policy H4 when considering proposals for:
- houses or flats shared by 7 or more occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (large houses in multiple occupation or HMOs, outside any planning use class); and
 - housing for older people and vulnerable people (potentially in Use Classes C2 or C3, or outside any planning use class).

Policy H4 Maximising the supply of affordable housing

The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,565 additional affordable homes from 2015-2030, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

We will expect all residential developments with a capacity for 10 or more additional dwellings to provide affordable housing. The Council will seek to negotiate provision from specific proposals on the basis of:

- a. the maximum reasonable amount of affordable housing under the specific circumstances of the site;
- b. an affordable housing target of 50% of the total addition to housing floorspace for developments with capacity for 30 or more additional dwellings and for larger mixed-use schemes;
- c. a sliding scale for developments with capacity for 10 to 30 additional dwellings, starting at 10% where capacity is for 10 additional dwellings, and increasing by 2% with every 1-dwelling increase in capacity;
- d. a guideline mix of 60% social-affordable rented housing and 40% intermediate housing;
- e. a presumption that the affordable housing will generally be provided on-site; and
- f. flexibility for the affordable housing to be provided off-site in the same area or exceptionally through a payment-in-lieu where affordable housing cannot practically be provided on-site or off-site provision/ a payment-in-lieu would be beneficial in terms of the quantity or quality of affordable housing.

We will seek to ensure that where development sites are split or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution is comprehensively assessed for all the sites together. The

Council will seek to use planning obligations to ensure that all parts or phases of split or related sites make an appropriate affordable housing contribution.

In considering whether affordable housing provision should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:

- g. the character of the development, the site and the area;
- h. site size, and constraints on including a mix of market and affordable tenures;
- i. access to public transport, workplaces, shops, services and community facilities;
- j. the impact on creation of mixed, inclusive and sustainable communities;
- k. the economics and financial viability of the development including any particular costs associated with it; and
- l. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Meaning of affordable housing

- 3.72 The government defines affordable housing in the National Planning Policy Framework. To comply with the government definition, affordable housing should:
- be provided to households whose needs are not met by the market;
 - be provided to eligible households, where eligibility takes into account local incomes and house prices;
 - remain at an affordable price for future eligible households unless the subsidy is recycled for alternative affordable housing provision.
- 3.73 The government includes three types of housing within this broad definition.
- 3.74 Social rented housing is provided at rents guided by national targets, and is mostly owned by the Council or Housing Associations.
- 3.75 Affordable rented housing is also provided to households who are eligible for social rented housing, mostly by the Council or Housing Associations. Rents are guided by local market rents rather than national targets.
- 3.76 Intermediate housing costs less than market housing but more than social rented housing and complies with the overarching government definition of affordable housing. It includes shared ownership, other low cost ownership and intermediate rent. It can also include key worker housing for groups such as health service staff, teachers and workers in emergency services. The Mayor sets caps on the income groups eligible for intermediate housing through the London Plan (updated in Annual Monitoring Reports).
- 3.77 The Council will seek planning obligations to ensure that affordable housing is delivered in tandem with the delivery of market housing and complies with the definitions. In particular we will ensure that affordable housing is available to Camden households that are unable to access market housing, and continues to be available at an affordable price in the future.
- 3.78 For the purposes of this policy, social and affordable rented housing are considered together as “social-affordable rented housing”, which reflects the approach of the London Plan. However, the Camden Affordable Rent Study 2011 and emerging housing needs evidence indicate that the cost of larger market homes in Camden is far beyond the reach of most families in housing need.

Consequently, in seeking social-affordable rented housing, we will give priority to family homes at or around the level of guideline target rents as resources and development viability permit.

- 3.79 More details about the categories of affordable housing and how they are controlled are given in the London Plan, the Mayor's Housing SPG and Camden Planning Guidance 2: Housing supplementary document.

Strategic affordable housing target

- 3.80 Camden has a particularly large requirement for additional affordable homes. As indicated in policy H1, on the basis of the London Plan and the London SHLAA we seek to exceed a target of 11,130 additional self-contained homes from 2015/16 - 2030/31. To set a target for affordable housing we have considered the level of provision likely to be viable and deliverable, taking into account the relationship between development costs, market housing prices, the income households have to spend on housing, affordable housing need, and the anticipated housing output of the Council's Community Investment Programme. Balancing these considerations, the Council considers that it is feasible for the borough to secure 50% of the self-contained housing target as affordable homes, which equates to our strategic target of 5,565 additional affordable homes over the Plan period.

Threshold for developments to provide affordable housing

- 3.81 The London Plan indicates that boroughs should normally require affordable housing provision from sites with capacity to provide 10 or more homes, and encourages boroughs to seek lower thresholds where it can be justified, such as where this can achieve an equitable contribution from dwellings with a large floorspace.
- 3.82 Given the scale of affordable housing need in the borough, the Council's aspiration is that as many residential developments as possible should provide affordable housing. Camden's CIL Viability Assessment 2014 indicates that small developments (with fewer than 6 homes) are the most viable residential developments in much of the borough. The greater viability of small developments arises in part because they have not been liable to make affordable housing contributions in the past.
- 3.83 On the basis of the CIL Viability Assessment, we have produced a draft Camden Charging Schedule for the Community Infrastructure Levy (CIL). The draft Charging Schedule proposes a substantially higher charge for schemes involving fewer than 10 homes (or less than 1,000 sq m) across the majority of the borough. The draft Charging Schedule has been considered at public examination and the Council hopes to operate a Camden CIL from April 2015. In order to justify a threshold below 10 homes the Council would need to demonstrate that a lower threshold would be viable when applied alongside the proposed Camden CIL. If the Charging Schedule is set as currently proposed it is not likely that any significant contribution to affordable housing would prove to be viable for small schemes.
- 3.84 The government has very recently issued guidance advising that councils should not seek affordable housing from developments involving 10 homes or less, or 1,000 sqm or less. The government's guidance threshold is marginally

higher than Camden's current thresholds, since it would exclude proposals of exactly 10 homes or 1,000 sqm from making affordable housing provision. The government's recent guidance also advises councils to apply a vacant building credit where housing would be created by conversion or redevelopment of vacant buildings that have not been abandoned. The guidance is not part of the National Planning Policy Framework, and the Council wishes to consider its status and implications alongside Camden's housing needs. Taking into account the draft CIL Charging Schedule and the Council's wish to examine the government's guidance more closely we have not proposed alterations to Camden's threshold at this stage.

- 3.85 In line with the London Plan, the Council currently proposes that residential developments should contribute to affordable housing where they have capacity for 10 additional homes or more. Developments are considered to have capacity for 10 additional homes where 10 additional homes would be provided, or where the additional residential floorspace is 1,000 sq m or more Gross External Area (GEA). Further details of how the threshold is applied are set in Camden Planning Guidance 2: Housing supplementary document.



Basis for seeking affordable housing provision from specific proposals

- 3.86 Given the scale of affordable housing need in the borough, the Council seeks the maximum reasonable amount of affordable housing on development sites in accordance with the London Plan. Policy H4 criteria (b) to (f) provide a common basis for negotiations while criteria (g) to (l) set out factors that will determine what is reasonable in any particular case. The following paragraphs outline the operation of criteria (b) to (f), while the subsequent section outlines criteria (g) to (l). Camden Planning Guidance 2: Housing supplementary document provides more detailed guidance on the operation of the criteria.

- 3.87 For the purposes of policy H4 we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), and seek provision of affordable housing where a development of small houses in multiple occupation would have capacity to provide 10 or more self-contained homes. This reflects the freedom provided in legislation for changes between these uses without a planning application.
- 3.88 Where larger houses in multiple occupation are proposed, and the development would have the capacity to provide 10 or more self-contained homes, we will seek affordable housing unless the development is secured as a long-term addition to the supply of low cost housing. Similarly, we will seek affordable housing where market housing is proposed for older people or vulnerable people, and the development would have the capacity to provide 10 or more self-contained homes. However, we acknowledge that such forms of housing are likely to have distinctive financial viability characteristics, particularly if an element of care is involved, and that the delivery of on-site affordable housing may not be compatible with the nature of the development. When considering such proposals the Council will be guided by policy H4 but will take a flexible approach to ensure that overall supply of housing is maximised.

Negotiating targets based on floorspace and sliding scale

- 3.89 We will operate affordable housing negotiating targets (criteria (b) and (c)) on the basis of the percentage of additional residential floorspace. The use of floorspace in negotiation ensures that we are able to secure large affordable homes with 3 bedrooms or more. Seeking large affordable homes is consistent with London Plan priorities and will help us to relieve overcrowding in social rented housing, where existing supply is skewed towards one- and two-bedroom homes.
- 3.90 We have set an affordable housing negotiating target of 50% of floorspace for larger residential schemes (those with capacity for 30 or more additional homes), on the basis that 50% of floorspace passes the viability test for most types of schemes in most parts of the borough. However, we have set targets for smaller schemes on the basis of a sliding scale from 10% of additional floorspace where there is capacity for 10 or more extra homes, up to 50% additional floorspace where the capacity reaches an addition of 30 or more. The sliding scale is needed to ease the distorting effect of the affordable housing threshold. If a 50% target was applied at 10 additional homes, a developer crossing the threshold would need to provide at least nine additional affordable homes before being able to produce one more market home. The introduction of such a high step would create a perverse incentive for developers to provide 9 homes or 999 sqm of residential floorspace on sites with potential to provide more.
- 3.91 Above the 10 dwelling threshold/ 10% target, capacity for each further additional dwelling (or each 100 sqm additional floorspace) increases the target by 2%. Thus the target for a scheme with capacity for an additional 12 dwellings is 14%, at 18 additional dwellings the target is 26%, and at 24 additional dwellings that target is 38%.
- 3.92 As indicated in the paragraphs accompanying policy H2 where a mixed-use development involves an addition of 1,000 sqm or more to non-residential floorspace alongside a residential element with capacity for 10 or more homes, the Council's affordable housing target is 50% of the additional housing

floorspace, and the sliding scale will not apply. This is to reflect the potential for non-residential floorspace to enhance the overall viability of the development, and also to avoid the complexity that would arise from operating the sliding scale in tandem with the provisions of policy H2. However, where a mixed-use development adds less than 1,000 sqm of non-residential floorspace and also has a residential element with capacity for 10 or more additional homes, the development will be predominantly residential, and the sliding scale approach will apply.

Guideline mix of affordable housing types

- 3.93 Provision of intermediate housing (between the cost of social rented housing and market housing) has some potential to retain middle income households in Camden and lessen social polarisation. Intermediate housing can also help younger households into owner occupation by buying into shared ownership, or through intermediate rents that give them some scope to save for a mortgage deposit. However, high values in many parts Camden mean that the intermediate housing is often only cheap enough for those with relatively generous incomes, and many middle income households may be better off moving to market housing further away from Central London. To balance these concerns, the Council has set guideline percentages for the split of affordable housing types at 60% social-affordable rented housing and 40% intermediate housing. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden.
- 3.94 These guidelines will be applied flexibly taking into account the criteria in policy H4. Where a proposal falls considerably short of the affordable housing negotiating target, or where the intermediate housing cannot be delivered at a prices low enough to meet the needs of households unable to access market housing, the Council may seek social-affordable rented housing in place of intermediate housing. Where a proposal substantially exceeds the negotiating target and is designed to meet the needs of a particular group, the Council may support development that only provides intermediate housing or only provide social-affordable rented housing. For example, the Council has permitted a number of developments that are predominantly or wholly intermediate housing where homes are designated for health service workers or where they are specifically designed to provide discount home ownership for first time buyers.

Whether the affordable housing should be provided on-site

- 3.95 In line with the NPPF, the Council's strong preference is for affordable housing to be provided on-site alongside market housing because this helps to create mixed and inclusive communities and ensure that the delivery of the affordable housing is secured to the same timescale as the market housing. The Council accepts that there are some circumstances where it may be appropriate to deliver some or all of the affordable housing off-site. In considering whether off-site provision is appropriate, the Council will consider the criteria set out in policy H4 and other relevant factors such as whether a greater number of affordable homes could be delivered through an off-site solution, whether it is practical for a single block to accommodate market and affordable homes, and the affordability of the anticipated service charges. Market and affordable housing have been successfully delivered alongside each other on a number of small

sites in Camden, and the Council will expect developers to demonstrate that they have worked with affordable housing providers to consider fully whether the development can be designed to provide on-site affordable housing.

- 3.96 The Council's approach to off-site provision of affordable housing is essentially the same as our approach to off-site provision of housing in association with non-residential development, but it is repeated in this part of the Local Plan for clarity. When the Council considers proposals for off-site provision, the Council will take into account all related sites when assessing how much affordable housing is required. Where a development omits affordable housing it will be possible to deliver additional market housing on-site, and the Council will seek additional affordable housing floorspace in proportion with the additional market floorspace.
- 3.97 Where the Council accepts that off-site provision is appropriate, we will seek development of the affordable housing on an alternative site nearby, secured by a planning obligation. Given the intense competition for sites in Camden, the Council will normally expect the Planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites).
- 3.98 Alternative sites must be in the borough, and will initially be sought in the same ward as the development. Where the development is south of Euston Road, and no sites are available in the same ward, the Council may consider alternative sites south of Euston Road. Where the development is north of Euston Road, if no sites are available in the same ward, the Council will subsequently seek sites in an adjacent ward to the north of Euston Road, and finally seek the nearest appropriate site to the north of Euston Road. As part of the consideration of off-site options we will explore with developers whether the affordable housing could be delivered on Council-owned land.
- 3.99 Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for affordable housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation.

Split sites and related sites

- 3.100 Where a site or a group of related sites becomes available for development, the Council will expect proposals to take the form of a comprehensive scheme rather than piecemeal development, and will expect a single assessment of the maximum reasonable amount of affordable housing taking account of all components. We will seek to resist schemes that are artificially split into a series of proposals to avoid reaching the affordable housing threshold or the full 50% affordable housing negotiating target. We will seek planning obligations to ensure that each part of a split or phased development makes an appropriate affordable housing contribution, having regard to the contribution that would arise from a single assessment across all components. If appropriate, the Council will use planning obligations to ensure that the affordable housing contribution is triggered by the phase that brings the cumulative residential addition to 10 homes or 1,000 sqm (GEA), and increases in accordance with the final cumulative residential total after a specified period.

Achieving an appropriate mix of market and affordable housing types

- 3.101 Policy H4 criteria (g) to (l) indicate the factors that we will consider when assessing the mix of market, intermediate and social-affordable rented housing appropriate for a site, and whether any off-site delivery of affordable housing is appropriate. Details of how these criteria will be applied are set out in Camden Planning Guidance 2: Housing supplementary document (including the assessment of financial viability), but a number of key considerations are set out below.
- 3.102 The character of the development, the site and the area (including site size and the ability to accommodate additional entrances and circulation spaces) will influence whether it can accommodate a mix of market and affordable housing. Factors to be considered include whether existing buildings need to be retained on-site (e.g. heritage assets), whether dual-aspect homes and large homes of 3 or more bedrooms can be incorporated (particularly for social-affordable rented housing), and the implications of anticipated service charges on the cost of affordable housing.
- 3.103 Generally sites in the borough have good access to public transport, workplaces and facilities. However, in very rare cases where a proposal is demonstrably remote from workplaces and facilities and has low public transport accessibility, on-site provision of affordable housing may not be appropriate. Most areas in the borough also have reasonably mixed and sustainable communities, including both market and affordable housing. However, there are some areas that have a very high proportion of market housing or social-affordable rented housing, which may sometimes influence whether on-site or off-site affordable housing is most appropriate, or the most appropriate mix of affordable housing types.
- 3.104 In negotiating an affordable housing contribution, the Council will consider all aspects of financial viability, including the availability of public subsidy, particular costs associated with the development such as restoration of heritage assets and remediation of contaminated land. Where a proposed development would not meet the Council's affordable housing target, we will expect submission of a financial viability appraisal to justify the proportion of affordable housing proposed, taking account of the costs and returns associated with residential and non-residential elements of the scheme. In appropriate circumstances, the Council may also seek an independent verification of the appraisal funded by the developer.
- 3.105 The Council will positively consider alternative approaches that can better maximise the supply of affordable housing while providing an appropriate mix of affordable housing types, for example by converting existing market housing into affordable housing. The Council will also consider how proposals deliver other plan objectives and their impact on the potential to deliver affordable housing e.g. the impact of including affordable business space for small and medium enterprises (SMEs).

Protecting and improving affordable housing

- 3.106 Policy H5 seeks to protect all affordable housing floorspace in the broad sense of housing that is provided at less than market costs due to the character of the homes, the occupants, or the providers, or a formal affordable housing designation where people live long-term. It seeks particularly to protect:
- social-affordable rented housing and intermediate housing managed by the Council, Housing Associations and other Registered Providers;
 - key-worker accommodation such as nurses' homes and hostels; and
 - other low cost housing provided in connection with a job and such as a caretaker's flat.
- 3.107 Other policies in this section also provide more specific provisions protecting particular types of housing as follows:
- housing for older people, homeless people and vulnerable people is protected by policy H8;
 - student housing is protected by policy H9;
 - other housing where occupiers do not live as a family but share facilities such as toilets, bathrooms and kitchens (such as bedsits) is protected by policy H10.
- 3.108 Losses of affordable housing may not always be subject to planning control, for example where the housing is ancillary to another primary use (e.g. a nurses' home provided as part of a hospital) and no change is proposed to the primary use.

Policy H5 Protecting and improving affordable housing

The Council will aim to secure sufficient high quality affordable homes of different types and sizes to meet the needs of existing and future Camden households who are unable to access market housing and create mixed, inclusive and sustainable communities by:

- a. regenerating existing estates and providing more and better affordable homes at an appropriate density through the Community Investment Programme and Better Homes Programme; and
 - b. protecting existing affordable housing floorspace of all types.
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Regenerating estates and homes

- 3.109 As part of the Council's Community Investment Programme (CIP) we are undertaking widespread estate regeneration and works to existing homes to ensure that the Council tenants live in good quality accommodation that meets contemporary standards. Through estate regeneration and other CIP proposals, we will replace 650 Council rented homes which are too expensive to repair and maintain, build 750 new affordable homes (including new Council rented homes) and build 1,650 new market homes that will be offered to local people first. Estate regeneration also aims to deliver wider benefits by tackling health inequality,

helping local residents to take advantage of growing employment opportunities, and making our communities more sustainable and resilient.

- 3.110 CIP proposals will generate funds for the Council's ongoing "Better Homes" programme, which refurbishes existing Council homes. Since the programme started in April 2011 around £50 million has been invested each year and thousands of Council homes have been improved, but many homes still need work to kitchens, bathrooms, wiring, windows, roofs, heating, lifts and other aspects of the structures and fittings. We estimate that investment of over £50 million in our Council housing will be needed every year for the next 30 years.



Loss of affordable housing

- 3.111 As indicated in policy H4, Camden has a particularly large requirement for additional affordable homes. However, the stock of formally designated affordable homes in the borough fell between 2001 and 2011, widening that gap between need and supply. The 2011 Census² showed a reduction of 2,000 in the number of households living in social rented homes, only partly off-set by the emergence of just under 700 households occupying affordable homes in shared ownership. In the last 20 years there has also been a reduction in the amount of housing provided for nurses and other health service workers, including the loss of hostels in Guilford Street (formally attached to University College Hospital), Euston Road (former Elizabeth Garrett Anderson hospital), College Crescent and New End (both formally attached to the Royal Free Hospital). The Council therefore protects existing affordable housing against further losses.
- 3.112 The existing affordable housing stock is heavily skewed to 1 or 2-bedroom homes, and overcrowding in the existing stock creates a compelling need for an additional supply of large affordable homes with 3 or more bedrooms. Older accommodation for health service workers often has shared facilities such as kitchens and bathrooms, whereas contemporary demand from key workers is for self-contained accommodation. To take account of this mismatch between

supply and demand, the Council seeks to protect affordable housing floorspace rather than each individual affordable home, and will support proposals that adapt affordable homes to fit contemporary and future needs, for example by combining small flats. Where such adaptations take place, the Council will seek to ensure that arrangements are in place to re-house all existing occupiers.

3.113 Redevelopment of affordable housing should generally provide new social-affordable rented housing to replace existing social-affordable rented homes, and new intermediate affordable housing to replace existing intermediate homes. Where the existing housing is for key workers or provided in connection with a job, redevelopment should provide for the same group of occupiers unless their needs have been met elsewhere, in which case social-affordable rented housing and intermediate housing will be sought. The Council will consider the mix of replacement affordable housing types flexibly, and seek to address mismatches between supply and demand, having regard to policy H4. The Council will also be flexible in considering replacement affordable housing on an alternative site provided that the replacement housing will:

- continue to give occupiers access to public transport, workplaces, shops, and community facilities; and
- contribute to creating a mixed, inclusive and sustainable communities.

3.114 The Council's Community Investment Programme (CIP) will involve refurbishment of many parts of our estates, and redevelopment in some cases. The programme is a long-term strategy, and will involve relocating some occupiers while their homes are refurbished or redeveloped. Over the course of the programme, there may be redistribution of occupiers and of affordable housing floorspace from one part of an estate to another, or even from one estate to another. The Council will take a strategic approach to estate regeneration, taking into account the potential to attract investment and the benefits of mixed and inclusive communities. We will resist the loss of affordable housing floorspace across the programme as a whole, but may not resist localised or short-term losses provided a strategy is in place for their eventual replacement.

3.115 Housing and affordable housing required in association with mixed-use policy H2 and affordable housing policy H4 should be provided in addition to any retained or replacement affordable housing arising under policy H5.

Housing choice and mix

Mixed, inclusive and sustainable communities

- 3.116 The Council aims to achieve mixed, inclusive and sustainable communities by seeking a range of housing types suitable for households and individuals with different needs. Seeking a range of housing types, sizes, accessibility and affordability will help us deliver the Camden Plan by tackling inequality, creating sustainable and resilient neighbourhoods, improving health and well-being and securing a supply of housing suitable for individuals and families on low and middle incomes. Tailoring housing types to people's particular needs will also help us ensure the right housing for Camden's diverse communities in line with the recommendations of the Equality Taskforce.
- 3.117 Development sites in Camden typically cater for fewer than 100 homes, and it will not be feasible to include a very wide range of housing in every development, however we will seek opportunities to address our priority for self-contained housing including affordable housing wherever possible. On individual sites, we will seek a mix that addresses borough wide and local needs, taking into account the characteristics and constraints of the site and area.
- 3.118 Individual policies in this section of the Plan address the specific housing needs of a number of groups in our community:
- policy H6 addresses the overall need for a mix of housing types, the particular needs of people with mobility difficulties and wheelchair users, the needs of service families, and the potential for people to build their own homes;
 - policy H7 addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of household;
 - policy H8 addresses homes for older people, homeless people and vulnerable people;
 - policy H9 addresses the housing needed for students;
 - policy H11 addresses the accommodation needs of gypsies and travellers and travelling showpeople.

Policy H6 Housing choice and mix

The Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking a wide variety of high quality homes suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.

We will:

- a. seek a diverse range of housing products in the market and affordable sectors to meet the needs across the spectrum of household incomes, and particularly promote the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities;
- b. seek provision suitable for families with children, older people, people with disabilities, service families and people wishing to build their own homes;
- c. expect a range of dwelling types and sizes to meet the particular needs of existing and future households as set out in policy H7;

- d. expect 10% of homes to be designed so that they are suitable for occupation by a wheelchair user or could be easily adapted for occupation by a wheelchair user, secured through Building Regulations as appropriate; and
 - e. expect all remaining housing to be designed to satisfy the principles of Lifetime Homes criteria, secured through Building Regulations as appropriate.
-

High quality homes and residential space standards

- 3.119 Many aspects of housing quality have a critical impact on the health and well-being of occupiers. These aspects of quality include the external environment, the condition of the property and its state of repair and decoration, accessibility, internal space and number of bedrooms, separation between functions such as kitchens, living rooms and bedrooms, adequate noise insulation, and daylight and sunlight and all of which can affect physical and mental health and influence life chances. The Council will therefore seek to secure a variety of high quality housing to meet the needs of different users, and will not sacrifice quality in order to maximise overall housing delivery.
- 3.120 Housing should be designed with regard to:
- relevant policies throughout the Plan, particularly policies relating to design and heritage and amenity;
 - Camden Planning Guidance, particularly Camden Planning Guidance 1: Design supplementary document and Camden Planning Guidance 2: Housing supplementary documents;
 - Supplementary Planning Guidance issued by the Mayor of London; and
 - Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods.
- 3.121 One feature of a high quality home should be a design that ensures sufficient space is available for furniture, activity and movement. Residential space standards are set out in The London Plan 2011 taking into account commonly required furniture and the spaces needed for different activities and moving around. These differ slightly from the standards included in past editions of the Council's guidance in Camden Planning Guidance 2: Housing supplementary document, but we consider they provide an appropriate basis for a common approach across London.
- 3.122 The space needed for furniture, activity and movement should be considered when designing all forms of housing, but the Council considers that the specific London Plan residential space standards should apply to self-contained houses and flats (Use Class C3), houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4), and the residential part of live/ work units (outside any use class). The Council will operate the London Plan's residential space standards where these types of housing are created through any form of development, including conversion of existing homes and non-residential properties, and will operate standards flexibly taking into account the constraints arising from conversion of an existing building.
- 3.123 The government has recently consulted on proposals for a nationally described space standard that matches the London Plan standard in most respects. The government intends that the nationally described space standard should replace

all local standards. Councils will be able to adopt the government standard where it is shown to be financially viable to operate locally, otherwise no standard will apply.

- 3.124 The GLA has indicated that once the nationally described space standard has been introduced the Mayor will seek to adopt it through an alteration to the London Plan. The Council will also consider adopting the nationally described space standard in the Local Plan. Unless the government prevents us from doing so, the Council will seek as far as appropriate to apply the nationally described space standard (or a similar standard) to the conversion of existing homes and non-residential properties.

Social polarisation and affordability across a range of incomes

- 3.125 The split between affordable housing and market housing will not secure housing suitable for households across a full range of incomes in Camden. Emerging housing needs evidence suggests there are wide gaps between the cost of housing at target social rents and the very cheapest privately rented housing, and between the costs of the cheapest private rented housing and the cost of entering owner-occupation. Local housing allowance (the benefit provided to help with private rents) is insufficient to cover the cost of privately rented housing in most cases.
- 3.126 These gaps are particularly wide in the case of large homes (with 3-or-more bedrooms) and could exclude middle-income households from Camden, particularly those with children. The outcome could well be social polarisation between low income households in social-affordable rented accommodation and high income households in owner-occupation.
- 3.127 Intermediate housing is intended to bridge the gap between social-affordable rented housing and market housing. High capital values in Camden make it difficult to provide intermediate housing in the form of shared-ownership housing that meet the Mayor's income caps. For intermediate housing to tackle social polarisation effectively, it therefore needs to include a variety of alternative models including housing for rent and models where occupiers can switch from rent to shared-ownership. Further guidance on how the Council will seek a variety of intermediate housing types will be included in Camden Planning Guidance 2: Housing supplementary document as appropriate.

Private rented homes

- 3.128 Census data indicates that the share of households in private rented homes in Camden grew from 23.5% in 2001 to 32.3% in 2011, an addition of almost 10,000 households. In the same period, the share of households in social rented housing fell from 37.4% to 33.1%, a reduction of almost 2,000 households. The private rented sector is the largest source of housing for people who are not eligible for social rented housing and cannot afford to buy. Private renting is thought to play a significant role in limiting the social polarisation in the borough, and the Council will seek to actively foster the sector and support private tenancies for people in housing need.
- 3.129 Historically private rented homes have often been regarded as badly maintained properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. The Council is actively working to improve the quality of

accommodation in the private rented sector through consultation on additional licensing (which would provide for more inspection of privately rented houses in multiple occupation) and through the London Landlord Accreditation Scheme that the Council operates on behalf of authorities across the capital. We are also piloting our own local lettings agency, Camden Homes, which aims to provide an outstanding property management service for landlords and tenants.

- 3.130 The government and the Mayor are promoting the growth of a new development sector building homes specifically for private rent. Such a sector could potentially appeal to investors seeking a consistent long-term return, attracting a new source of finance into house-building, and also attract a new style of market developer involved in long-term management of the stock. We consider that build-to-let housing could potentially help to increase overall housing output in Camden, and could also help to fill part of the gap between social-affordable rent and owner-occupation. However, the turnover of occupiers of private rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations could potentially harm the stability and sustainability of a community.
- 3.131 Build-to-let development may well attract less interest from families than development for market sale, and a different mix of dwelling sizes may be appropriate. Financial viability for build-to-let development is different from developments built for sale because returns are realised over a longer period, and may mean that the appropriate level of affordable housing provision is lower. The Council will be flexible in the operation of affordable housing and dwelling size policies to development of build-to-let housing where we consider they will help to create mixed, inclusive and sustainable communities. We consider that build-to-let has the best potential to contribute to a sustainable community where occupiers are able to secure leases for longer periods such as 2-5 years, where a long-term commitment is in place to secure the management of the private housing element as rented accommodation, and affordable housing is provided on site.

Service families

- 3.132 The NPPF indicates that councils should plan for a mix of housing to meet the needs of various groups including the needs of service families. The government has made a number of commitments regarding housing members of the armed forces, including a requirement for councils to give additional preference to seriously injured service personnel who have urgent housing needs, referral schemes with a number of housing associations, tailored low cost home ownership schemes and assistance for necessary adaptations for injured service people.
- 3.133 Initial housing needs evidence for Camden based on the 2011 Census suggests that there are approximately 160 service personnel living in Camden, around a quarter of whom live in communal establishments. Regent's Park Barracks is located in the borough, and is thought to be a home of a number of Camden's service personnel. Camden's Local Plan policies support provision of affordable housing, including intermediate housing such as low cost home ownership and make provision for housing to suit people with mobility difficulties and other support needs. We consider that the needs of members of the armed forces and their families can be met by giving them appropriate priority within the measures

the Council has adopted to meet the housing needs of the wider community. The Council has already included service families in its priority list for intermediate housing.



Self-build and custom build housing

- 3.134 The NPPF indicates that councils should plan to meet the needs of people wishing to build their own homes. This is understood to refer to self-build and custom-build arrangements where prospective occupiers substitute their own skills for some of the services usually provided by a speculative developer. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management. In some cases custom-build can simply involve people who procure other professionals to build a bespoke home to personal specifications rather than a speculative home built to a standard design.
- 3.135 The London Strategic Housing Market Assessment 2013 (London SHMA) indicates that self build provides 32% of new homes in Wales and 23% in Scotland, compared with only 4% in England, and possibly as little as 2.1% in London. The government envisages that self-build could be promoted in England as a way of increasing overall housing output.
- 3.136 The London SHMA suggests that typical self-build sites in London are small infill sites, end of terrace spaces, backland sites, gardens, garages and small industrial sites. Based on records of completed new-build housing schemes involving a single new home, the London SHMA estimates that self-build output in London from 2009 to 2013 amounted to between 1.9% and 3.5% of the total. The London SHMA notes a survey that has indicated 13% of Londoners appear to be researching self-build (similar to the national average) but only 2% are actively working towards acquiring a site, submitting a planning application or starting construction work. The London SHMA also documents some group self-build

activity in London, usually in partnership with councils or registered providers such as housing associations. The London SHMA concludes that single unit self-build schemes are most likely to be practicable in low-cost parts of London, and group self-build has the best potential to deliver significant additional housing output in higher cost areas.

- 3.137 Land costs in Camden are extremely high, and the majority of housing output takes the form of flats built at relatively high densities. Consequently, the potential for people to acquire a site and use their own building skills to provide low cost homes is very limited. However, there is some evidence to suggest that custom-build for wealthier households is quite common in northern parts of the borough with a more suburban character. These sometimes involve infill sites and sometimes involve redevelopment of an existing residential plot. There may also be some interest in group self-build involving council-owned land, possibly in association with the Community Investment Programme.
- 3.138 Development monitoring records for Camden show that an average of 40 additional homes per year were completed in single unit schemes (around 9.7% of the output of self-contained homes), although more research would be needed to determine how many of these involved speculative development. It seems likely that custom-build is making a significant contribution to Camden's housing output, albeit probably involving households with high incomes. With respect to the wider community the conclusions of the London SHMA are likely to hold good in Camden, with group self-build offering the best potential for significant additional output and for lower income households to be involved in building their own home. This is a possibility that can be considered in more detail as the Plan progresses.

Lifetime Homes

- 3.139 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. Accessibility issues affect most families, people living alone and other households at some point, and affect young people as well as older people. Lifetime Homes are dwellings specifically designed to support the changing needs arising through a family's lifecycle, incorporating features to help accommodate pregnancy, prams and pushchairs, injury, disability, and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises, allowing people to live in their own home for as much of their life as possible. Lifetime Homes exceed the existing mandatory requirements of Part M of the Building Regulations.
- 3.140 The Council currently expects all dwellings developed in the borough to meet Lifetime Homes criteria, including self-contained houses and flats (Use Class C3), houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4), and the residential part of live/work units (outside any use class). The criteria are applied to conversion of existing homes and non-residential properties as well as new build development, but are operated flexibly taking into account the constraints arising from conversion of an existing building. All housing proposals should be accompanied by a submission showing how each of the Lifetime Homes criteria 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. Guidance on the criteria is currently included in Camden Planning Guidance 2: Housing supplementary document.

Wheelchair Housing

- 3.141 Many households will include someone who needs to use a wheelchair in the home, and their homes should meet more demanding design criteria. Wheelchair housing standards provide basic design criteria relating to movement and activity that would allow a property to be easily adapted to meet the needs of a wheelchair user, and more detailed design criteria that would secure a fully fitted-out home suitable for occupation by a wheelchair user.
- 3.142 The London Plan 2011 indicates that 10% of new housing should be designed to be accessible to be wheelchair accessible or easily adaptable for residents who are wheelchair users. On the basis of evidence in the Camden Housing Needs Study Update 2008, the Local Plan sets the same requirement as the London Plan.
- 3.143 The Council currently seeks wheelchair housing (or easily adaptable housing) in all housing development, including self-contained houses and flats (Use Class C3), houses and flats shared by 3-6 people who do not live as a family (small houses in multiple occupation, Use Class C4), and the residential part of live/ work units (outside any use class). We also expect 10% of designated student housing to be suitable for wheelchair users. The standards are applied to conversion of existing homes and non-residential properties as well as new build development, but are operated flexibly taking into account the constraints arising from conversion of an existing building and whether it would be possible for a wheelchair user to access it. Guidance on wheelchair housing is currently included in Camden Planning Guidance 2: Housing supplementary document.
- 3.144 For wheelchair housing to be fully fitted-out for occupation by a wheelchair user it should ideally be tailored to the specific needs of the household that will occupy it. In the case of social-affordable rented housing, future occupiers can be identified by local housing managers, from the Housing Register (waiting list), and from transfer lists. The Council therefore expects 10% of social-affordable rented housing in each development to be designed, built and fitted-out to meet wheelchair housing standards.
- 3.145 The Council will generally apply the wheelchair housing percentage across each affordability category in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing. We may seek to increase the percentage of social-affordable -rented wheelchair accessible homes and reduce the percentage of market and/ or intermediate wheelchair accessible homes where this will enable us to meet an identified need for affordable-social rented housing for wheelchair users.
- 3.146 The Council generally expects all additional housing to be developed as car-free housing, where no provision is made for resident parking made within the development or on the street (see policy T2). However, wheelchair users may need access to a car as a consequence of their disability. The Council will seek to ensure that suitably located and designed parking is available in association with wheelchair housing, particularly large wheelchair homes (3 bedrooms or more). Such parking will be made available on-street as far as possible, but where

there is no potential for suitable on-street parking, the Council will seek off-street parking for wheelchair users as part of the development.

Optional Building Regulation requirements for accessibility

- 3.147 The government considers that its proposed nationally described space standard would provide the internal space needed to accommodate wheelchair accessible housing. The government intends to include two new optional categories within Part M of the Building Regulations. The existing Part M requirements (with minor adjustments) will be known as Category 1. An optional Category 2 will secure accessible and adaptable dwellings, and seeks features broadly equivalent to those in Lifetime Homes. An optional Category 3 will secure wheelchair user dwellings, which are broadly equivalent to homes that are easily adaptable for residents who are wheelchair users.
- 3.148 Councils will be able include Local Plan requirements for homes that meet Category 2 or Category 3 requirements where it is shown to be financially viable to apply these locally, otherwise Category 1 will apply. Councils will then be able to specify through planning conditions which homes should meet each Category, and also specify any social-affordable rented homes that should meet Category 3 and be fitted-out for a wheelchair user.
- 3.149 We understand that once the Part M categories are introduced, the GLA will seek to include requirements in the London Plan for 10% of homes to meet Category 3 and for the remaining 90% to meet Category 2. The Council will also consider adopting a similar approach in the Local Plan.
- 3.150 It appears that the government's optional Building Regulations categories will not apply to proposals involving alterations to existing buildings. Unless the government prevents us from doing so, as far as appropriate the Council will seek the equivalent of Lifetime Homes and 10% wheelchair housing (or easily adaptable housing) when considering proposals for housing development involving the conversion of existing homes and non-residential properties.

Large and small homes

- 3.151 Policy H7 seeks a mix of dwelling sizes where the following types of housing are proposed:
- self-contained houses and flats (Use Class C3);
 - houses and flats shared by 3-6 occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4); and
 - live/ work units, which are self-contained homes that include a dedicated work area (not in any planning use class, we will treat them as Use Class C3 when we apply Local Plan policies).
- 3.152 Policy H7 applies wherever there is development that affects the mix of dwelling sizes for these housing types, whether the development involves construction of new buildings, extensions, alterations, conversions or changes of use, and includes the creation of separate homes from ancillary residential accommodation.
- 3.153 Other policies in this section provide more specific provisions relating to particular types of housing as follows:
- housing designated for occupation by older people, homeless people or vulnerable people – see policy H8; and
 - generally restricted to occupation by students during term-time - see policy H9.
- 3.154 Large and small homes are defined as follows:
- large homes are homes with 3 bedrooms or more; and
 - small homes are studio flats, 1-bedroom and 2-bedroom homes.

(note – evidence on the need for homes of different sizes generally does not distinguish between studio and one-bedroom homes).

Policy H7 Large and small homes

The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- b. includes a mix of large and small homes.

We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:

- c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;
- d. any evidence of local needs that differ from borough wide priorities;
- e. the character of the development, the site and the area, including the impact of the mix on child density;
- f. site size, and any constraints on including homes of different sizes;
- g. the economics and financial viability of the development; and

- h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

- 3.155 Camden's existing stock of homes is made up largely of relatively small dwellings, particularly homes rented from Housing Associations and the Council. The 2011 Census indicates that 70% of Camden households live in homes with 2 bedrooms or fewer, rising to 75% for households in social rented housing. The 2011 Census indicates that 12.5% of households overall are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 20% for households in social rented housing, and 6.2% for households in owner-occupation and shared ownership.
- 3.156 Census data shows that the average household size in Camden grew from 2.06 in 2001 to 2.18 in 2011. In the same period the proportion of 1-person households fell from 46% to below 41%. In 2011 the Camden's household composition was 40.5% 1-person households, 42.6% households comprising one family only (including 19.0% with dependent children) and 16.9% other household types such as unrelated people sharing a flat. GLA household projections suggest relatively little change to this composition over the Plan period.
- 3.157 The dwelling size priorities in the Camden Development Policies 2010 were based on two alternative models set out in the Camden Housing Needs Survey Update 2008, alongside other factors (such as the reluctance of 'downsizing' households to take-up 1-bedroom accommodation and the limited stock of existing affordable housing with 4 or more bedrooms). The priorities were also supported by the Camden local report of the North London Strategic Housing Market Assessment 2009/10. Dwelling sizes were expressed in terms of number of bedrooms and distinct priorities were identified for market housing, intermediate housing and social-affordable rent (at that time social rent).
- 3.158 The Council has commissioned a new assessment of housing needs, but this has not yet delivered final estimates of dwelling size needs. The Dwelling Size Priorities Table (Table 1) below adjusts the priorities on the basis of draft outputs.

Table 1: Dwelling Size Priorities

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

- 3.159 The Council acknowledges that there is a need and/ or demand for dwellings of every size shown in Table 1. We expect most developments to include some homes that have been given a medium or lower priority level. However, the Council has prioritised some sizes as 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 high priorities wherever it is practicable to do so.
- 3.160 Having regard to criteria (c) to (h) in policy H7, the Council acknowledges that it will not be appropriate for every development to focus on the higher priorities in the Table 1. 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 for social-affordable rented and market categories. The Council will generally resist development proposals for self-contained general needs housing that contain only one-bedroom and studio flats.

3.161 Between 2001 and 2011 an increase in the proportion of one-person households in Camden and a reduction in average household sizes was consistently anticipated by population projections and failed to materialise. This mismatch between expectations and outcomes suggests that projections around dwelling size requirements are fraught with difficulties, especially in the context of rapidly rising housing costs. Consequently, any more detailed percentage aims for specific dwelling sizes will be provided in Camden Planning Guidance 2: Housing supplementary document where they can be rapidly reviewed to reflect changing circumstances. Camden Planning Guidance 2: Housing currently indicates that the Council will aim for at least 50% of social-affordable rented dwellings in each scheme to be large homes, and on the basis of mismatches in the existing stock we expect to retain this aim.

3.162 The Council will be flexible when assessing development against policy H7 and the Dwelling Size Priorities Table. 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. Please see Camden Planning Guidance 2: Housing supplementary planning document for further details.



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

3.163 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.

- 3.164 Flexibility around dwelling sizes may also be required to achieve rational layout and the best possible accessibility arrangements. Adjustments to the mix may be needed to satisfy design and amenity concerns, such as minimising noise disturbance between flats – see also section 7 of the Plan on design and heritage. The Council is working to return vacant properties to use, and will use flexibility in policy H7 to ensure that layout difficulties which limit the introduction of large homes do not prevent empty properties from returning to use, particularly upper floors above commercial premises.
- 3.165 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 market homes with 3 bedrooms, particularly where the 3-bedroom homes have access to outside space. 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. Conversions that involve the loss of existing homes should also comply with policy H3.
- 3.166 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. A number of features are listed here that help to make developments suitable for children to live in, and where a number of these features are present we will expect the inclusion large homes, and particularly seek the inclusion of 4-bedroom social-affordable rented homes. Child-friendly features include:
- 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; and
 - 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.
- 3.167 There are relatively few opportunities in Camden for housing development that will provide more than one or two of these features. The Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development, and the full range of criteria in policy H7 should be fully considered.
- 3.168 High child densities can cause difficulties in some circumstances, typically where large numbers of children in the same age-group grow up in an environment with limited safe external recreation space. We will take account of existing child

densities in an area and the likely child density of the proposals, and consider whether mechanisms such as a lettings policy should be used to manage child density, or whether a reduced proportion of large homes would be appropriate.

Development economics, financial viability, and demand

- 3.169 As indicated in the paragraphs supporting policy H1, 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.
- 3.170 Large affordable homes are expensive to build relative to their rental value and are challenging to provide under the current grant framework, but they are a high priority for the Council and the London Plan. The demand for market homes of different sizes can vary across the borough and change quite rapidly, so that small homes generate higher values per square metre in some circumstances, and large homes generate higher values per square metre in others. The Council recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development, and will consider adjusting the mix of dwellings, particularly the mix of market dwellings in order to achieve the maximum reasonable amount of affordable housing floorspace on the site.
- 3.171 The Council may support development that exceeds our affordable housing target and provides affordable housing for a particular group e.g. intermediate housing designed to provide discount home ownership for first time buyers. When considering such proposals we will operate policy H7 flexibly having regard to the needs and the financial resources of the intended occupiers.

Housing for older people, homeless people and vulnerable people

- 3.172 Policy H8 relates to all housing designated for occupation by older people (people who are approaching pensionable age or have reached it) and housing designated for occupation by homeless people and vulnerable people who need support to enable them to live safely. Such housing is often referred to as 'supported housing'.
- 3.173 Examples of types of housing designated for older people, homeless people or vulnerable people include:
- sheltered housing - clusters of accommodation where people live independently in self-contained homes where low intensity support is available, sometimes on site (usually within Use Class C3);
 - extra-care homes – also independent living in self-contained homes, but designed to enable provision of higher intensity care as occupiers' needs increase, with on-site care usually available. On-site facilities may also provide support for older people in the wider community. Shared lounges and other social and leisure facilities are sometimes provided. Care home accommodation may also be included on site (extra-care homes are usually within Use Class C3, but this may vary depending on the level of self-containment of the homes and the level of care provided);
 - care homes where higher intensity care is available 24 hours – commonly bedsit rooms with shared lounges and eating – this may involve residential care only, nursing homes staffed by qualified nursing staff, or dual-registered care homes where medical assistance is provided to occupiers that need it (care homes are usually within Use Class C2);
 - small supported living schemes – homes shared by no more than 6 people living as a household with support available, sometimes on-site (within Use Class C3); and
 - hostels occupied by people with a shared support need (typically 7 or more people), most commonly homeless people (hostels are outside any use class).
- 3.174 Policy H8 does not address homes that happen to be occupied by older people or people with support needs, but are not designated for use by these groups. Specifically, other policies deal with:
- hospitals, religious orders and boarding schools – see policy C2;
 - hostels aimed at tourists and backpackers – see policy E3; or
 - student housing – see policy H9; or
 - houses and flats shared by a 3 or more occupiers who do not live as a family but share some facilities such as toilets, bathrooms and kitchens, and other housing with shared facilities, such as hostels for migrant workers – see policy H10.
- 3.175 The term 'vulnerable people' refers to a very broad group of people who need some kind of support with their living arrangements. Examples include people using mental health services, people with learning disabilities, looked-after children/ young people leaving care, people at risk of domestic violence, people with alcohol or drug dependencies, and exoffenders. Often individuals

have multiple support needs, such people with both physical and learning disabilities, elderly people with a mental illness and homeless people with a drug dependency.

Policy H8 Housing for older people, homeless people and vulnerable people

The Council will aim to ensure that there is a sufficient supply of appropriate housing available for older people, homeless people and vulnerable people to live as independently as possible.

We will support development of a variety of housing aimed at meeting the specific needs of older people, homeless people and vulnerable people provided that the development:

- a. will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and / or care;
- b. will be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers;
- c. contributes to creating a mixed, inclusive and sustainable community; and
- d. does not cause harm to nearby residential amenity.

In the case of the market-led development aimed at older people, homeless people or vulnerable people, particularly where the development contains self-contained homes, the Council will expect the development to make a contribution to the supply of affordable housing in accordance with policy H4.

We will also support development that adapts or replaces existing provision for older people, homeless people or vulnerable people with housing better able to foster independent living and accommodate any changes in their support and care needs.

We will resist development that involves the net loss of housing floorspace for older people, homeless people and vulnerable people unless either:

- e. it can be demonstrated that the existing homes are incapable of meeting contemporary standards for the support and/ or care of the intended occupiers; or
- f. adequate replacement accommodation will be provided that satisfies criteria (a) to (d) above; or
- g. the loss of floorspace is necessary to enable the development of housing for the same intended occupiers that satisfies criteria (a) to (d) above and is better able to foster independent living and meet any changes in their support and care needs; or
- h. the development will otherwise enable the provision of an alternative form of housing or support that better meets the objectives of this policy and the Local Plan.

Where the Council is satisfied that a development involving the loss of housing for older people, homeless people or vulnerable people is justified, we will expect it to provide an equivalent amount of residential floorspace for another of these groups of occupiers, or of permanent self-contained housing in Use Class C3,

including an appropriate amount of affordable housing, having regard to policy H4.

- 3.176 Policy H8 covers homes for a broad range of people who need housing that is tailored to their specific circumstances and provides access to support or care. The numbers of people needing some form of support is expected to increase over time due to factors such as greater identification of conditions such as autism, and growing numbers of older people with longer life expectancy.
- 3.177 The Council is currently developing strategies to meet the needs of the various groups of people involved, but common themes across these groups are for the Council to provide support and adaptations that enable people to remain in their own homes or to live as independently as possible in more suitable homes. We aim to reduce the number of people who need to be placed in residential care homes outside the borough, and provide greater opportunities for older people and vulnerable people to live in suitable accommodation within Camden.
- 3.178 Accessibility is often a key issue for older people and for vulnerable people. Accessible housing is required by many people of all ages with a physical disability, and a number of older people. We estimate that about 20% of people with learning disabilities also have mobility difficulties. The Council will seek to maximise opportunities for people to live independently in their own homes by ensuring that new homes are designed to be accessible and adaptable (the equivalent of Lifetime Homes), that a proportion of new housing is fully equipped or adaptable for wheelchair users, and that there are some larger sized wheelchair accessible homes for people who need to use non-standard wheelchairs. The Council also adapts general needs housing to meet the specific needs of its occupiers. We will make better use of adapted and adaptable housing in our borough to meet the needs of people with physical disabilities including older people.

Older people

- 3.179 Nationally, the number of people over 65 is forecast to grow dramatically over the next 20 years, and the number of people over 85 will more than double. This issue is less pronounced in Camden as the population profile is skewed towards young adults, nevertheless, the number of people aged over 75 is expected to increase from just over 11,000 to just over 16,000 during the Plan period.
- 3.180 The aging of the population could have a major impact on cost of care and support for older people. It is now widely recognised that the quality of life for older people can be increased and support costs reduced if more older people live in homes that can foster their independence but easily accommodate any support needs they may have as they age (e.g. Housing our Ageing Population: Plan for Implementation 2012, or HAPPI2).
- 3.181 We want to support older people to live independently in their own homes for as long as possible. We will provide advice and assistance to help people access housing and support that is right for their needs, including access to new technologies such as telecare. We will continue to support older people to downsize to 'Lifetime Homes' and adapted homes that meet their needs, and to move to supported living when they require greater support to remain

independent in their home. These moves may also free up larger homes for young families.

- 3.182 There are over 1,700 homes designated for older people to rent in Camden. These homes are primarily in sheltered housing schemes, but also include a small proportion of extra-care homes developed in the past five years. All are provided by the Council or Housing Associations. There are also two blocks providing sheltered homes to lease and several care homes providing for older people.
- 3.183 Draft Further Alterations to the London Plan set an indicative requirement benchmark for Camden to provide 100 additional homes per year specifically for older people, based on an estimated potential demand from 2.5% of households aged 65-74 and 15% of households aged 75 and over. The Further Alterations also suggest potential need across London for 400 – 500 additional care home places per year.
- 3.184 The likely need for homes for older people in Camden has also been assessed using the Housing LIN Older People Resource Pack 2012. This modelling distinguishes between different support needs and looks at 5-year requirements to facilitate planning at the scale of individual schemes, but suggests an aggregate need for 48 additional homes per year.
- 3.185 The Council considers that it may need to commission 100 additional extra-care places in the first five years of the Plan period, tailored particularly for high needs groups such as people living with dementia. Extra-care housing is an effective way to facilitate people maintaining their independence while ensuring their care and support needs are met. We are currently planning to provide up to 40 of these extra-care places on a site near Chalk Farm incorporating a resource centre to support older people in the wider community. We also anticipate that the sheltered housing stock will need modernising to better meet the needs of older age groups, and those those requiring higher levels of support to maintain their health.

Market and affordable housing for older people

- 3.186 There is a growing market for leasehold housing designated for older people, although the supply in Camden is very limited at present. The draft Further Alterations to the London Plan suggest that 65% of Camden's need for additional older people's homes is for homes to lease, and projections from Housing LIN suggest around 63%.
- 3.187 The resources older people have to access such accommodation vary considerably depending on whether they own their existing housing, any other assets and investments they have, and whether they have an occupational pension. New housing for older people will need to be available at a range of costs to suit a range of resources. The Further Alterations urge councils and providers to support the provision of intermediate models, and project Camden's requirements for affordable homes for older people at 20 intermediate homes per year and 15 for social-affordable rent.
- 3.188 The London Plan indicates that boroughs should apply the principles of their affordable housing policies to the range of housing for older people, including those in Use Class C2. Consequently, when considering market-led proposals for homes for older people to buy or lease, we will seek affordable provision in

accordance with the principles set out in policy H4. The Council acknowledges that arrangements for assessing affordability to people of pensionable age will be different from assessing affordability to people of working age, especially when housing costs include an element of care. We also recognise that this sector will have distinct viability characteristics, particularly where shared facilities and on-site support or care are provided. However, we will strongly encourage the providers to include a variety of tenures to suit older people from different backgrounds, or to make off-site affordable provision where on-site provision would not be practical.



Homeless people and vulnerable people

- 3.189 The Council works to prevent homelessness, guide households into more settled accommodation, and operates a 'pathway' approach that gradually prepares single homeless people for independent living. Pathway services offer temporary accommodation and support in buildings ranging from large hostels to small supported housing schemes. Support can take a variety of forms: often, factors such as mental health problems or alcohol/ drug dependency have contributed to homelessness. There is a specific Young People's Pathway, a Hostel Pathway and a Mental Health Pathway. For homeless families, the Council's focus is to reduce the need for temporary accommodation by helping families so settle into private rented housing.
- 3.190 There are currently 520 families living in temporary accommodation. The success of our homeless prevention work has meant that this number is slowly decreasing and we want to continue this work to find suitable long-term housing. We will work with individual families to find the right solution, taking into account the cost of different types of temporary accommodation and making full use of suitable private rented sector housing.

- 3.191 The Council is currently providing supported hostel accommodation to approximately 300 people with mental health issues. Recovery outcomes are good, but movement through to settled accommodation is too slow, and around a fifth of people we are supporting are currently placed outside the borough. The Council aims to improve opportunities for people in need of support to receive the right level of care in appropriate accommodation, and to increase move-through rates for people ready to move on to more settled accommodation.
- 3.192 The Council is currently providing residential support to a substantial number of people with learning disabilities. The majority are in supported living in Camden, but many are in care homes and some are in hospitals, often outside London. A range of general needs accommodation and shared supported living schemes will be needed to provide opportunities for people to return to Camden. We will work across tenures developing opportunities in the social-affordable rented, private rented and owner occupied sector.
- 3.193 The Council also has a new duty to provide services to people with autism spectrum behaviours. Many already receive support through the learning disabilities services or mental health services. We are considering options to better support people with an autism/asperger's spectrum diagnosis living in accommodation provided by the Council or using accommodation services we have commissioned.

New provision

- 3.194 Policy H8 sets out basic criteria for assessing housing proposals for older people, homeless people and vulnerable people, including the appropriateness of the location. Key issues are the fit between the proposed facilities and the needs of the occupiers, the facilities and social networks available in the surrounding community. Links to social networks are vital to prevent people in supported housing from becoming isolated, particularly older people.
- 3.195 In some parts of the borough there have been problems in the past where supported housing facilities such as homeless hostels have been too large or have been clustered together, becoming a focus of antisocial behaviour. A concentration of people who have high support needs can unbalance the social mix in an area, create noise and disturbance and damage the amenity and quality of life for other local residents and visitors. The location of and character of new provision should be such that antisocial behaviour can be controlled and occupiers can contribute to the balance and inclusiveness of community. Where appropriate, the Council will use conditions and / or legal agreements to control the management of housing for people with support needs, and to specify the group or groups that it is intended to support.
- 3.196 We anticipate that new provision will be developed by the Council and by independent providers, and through partnership arrangements between them, with the majority of new housing for older people being developed for leasehold ownership. We also anticipate some reconfiguration of the existing stock.

Protecting existing provision

- 3.197 In many circumstances, supported housing will generate a lower return than development of general needs housing. Housing sites that have a lower market value than those available for general market housing are rare, and where the

Council accepts that a property or site is no longer appropriate for housing the current type of occupier, we will consider the needs of other older people, vulnerable people and homeless people, and whether the property could be developed to meet those needs. Where the Council accepts that a site or property is no longer appropriate for provision of supported housing of any kind, we will expect its development for self-contained general needs housing, including an appropriate proportion of affordable housing.

- 3.198 Traditionally, hostels have formed a significant proportion of available supported housing. However, hostels are also provided for a diverse range of groups without support needs, such as students and backpackers. Hostels do not fall into a planning use class, so any material change to the use (including a change to the type of occupier) is classed as development. Where the Council accepts that a hostel site or property is no longer appropriate for provision of supported housing of any kind, the Council will expect its development for self-contained housing, including an appropriate proportion of affordable housing. The Council will not support changing the use to a hostel for people without support needs unless the site or property is unsuitable for self-contained general needs housing.
- 3.199 When considering redevelopment for self-contained general needs housing, the Council will have regard to the criteria set out in policy H4 and any need to generate funding for replacement housing for older people, homeless people or vulnerable people elsewhere. If replacement supported housing is provided elsewhere, we will consider the proportion of affordable housing provided across both sites. We will resist proposals for non-residential development in accordance with policy H3 and will seek to retain existing affordable housing in accordance with policy H5.

Student housing

- 3.200 This policy particularly relates to housing that:
- is primarily occupied by students, regardless of whether it is managed by an education institution or an independent provider;
 - is generally restricted to occupation by students during term-time;
 - is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
 - provides some common facilities and/ or services, although the extent of these can vary.
- 3.201 Other policies contain specific provisions for some kinds of housing that may be occupied by students:
- other houses and flats shared by a 3 or more occupiers who do not live as a family but share facilities such as toilets, bathrooms and kitchens (houses in multiple occupation or HMOs) are considered in policy H10;
 - key-worker accommodation such as nurses' homes and hostels are considered in policies H4 and H5;
 - self-contained houses and flats are considered in policies H3, H4, H6 and H7; and
 - hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in policy E3.
- 3.202 In this plan the expressions "academic term" and "term" refer to a continuous period of classes or learning, whether the year is divided into two, three or four. The minimum length of a term is usually eight weeks.

Policy H9 Student housing

The Council will aim to ensure that there is a supply of student housing available at costs to suit students from a variety of backgrounds in order to support higher education institutions in Camden and Camden's international academic reputation.

We will seek a supply of student housing to meet Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development:

- a. will not involve the net loss of 2 or more self-contained homes;
- b. will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;
- c. will not involve land identified for self-contained housing through a current planning permission or a development plan document;
- d. complies with any relevant standards for houses in multiple occupation (HMOs);
- e. serves higher education institutions based in Camden or adjoining boroughs;
- f. includes a range of flat layouts including flats with shared facilities;
- g. have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;
- h. will be accessible to the institutions it will serve and to public transport, workplaces, shops, services, and community facilities;

- i. contributes to creating a mixed, inclusive and sustainable community; and
- j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

Where proposed student housing development is not robustly secured as student housing in accordance with criterion (g) the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to policy H4.

We will resist development that involves the net loss of student housing unless either:

- k. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or
- l. adequate replacement accommodation will be provided that satisfies criteria (a) to (j) above;
- m. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect the development to create an equivalent amount of residential floorspace for older people, homeless people or vulnerable people, or permanent self-contained housing in Use Class C3, including an appropriate amount of affordable housing, having regard to policy H4.

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- 3.203 The number of students at London's universities has increased steadily from 2001-2011, and growth is expected to continue. Many education institutions of national and international significance are based in Camden, notably ten publicly funded universities. In addition, Camden has a number of other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden's international academic reputation by helping them to attract students, particularly overseas students. The provision of higher education and research makes a major contribution to Camden's economy and is part Camden's wider Central London role as focus of employment, shopping, culture and entertainment.
 - 3.204 The 2011 Census indicated that 25,130 full-time students aged 18 over were resident in Camden during term-time, or 11.4% of the usual resident population. We estimate that by 2011/12, Camden had 8,500 places in housing provided specifically for students. This is generally consistent with the recommendation of the Mayor's academic forum that student accommodation should be available for around 33% of full-time students. Since 2011/12, more than 1,000 additional student places have been provided, and we estimate that there will be a total of around 11,000 places by 2015.
 - 3.205 The main alternative source of accommodation available to students in Camden is private rented housing. Depending on property size, median private rents in Camden have risen by 6% to 17% from mid-2011 to mid-2014 (based on VOA data in the GLA Rents Map, with the largest rises applying to homes 4-or-more bedrooms). The Council considers that the provision of additional designated student housing can help to limit additional pressure on the wider private rented market.

- 3.206 We estimate that Camden's requirement for additional student housing during the Plan period is 160 places per year, or 2,400 places in total (see policy H1 and accompanying paragraphs), and through planning permissions already in place and designations in Camden's development plan documents we consider there are deliverable sites in place to meet requirements to 2020-21 and developable sites to meet requirements for the subsequent 10 years. However, given the concentration of higher education institutions in Camden, we expect pressure for student housing development to continue.
- 3.207 Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in Camden Planning Guidance 2: Housing supplementary document.

Additional student housing and the priority for self-contained homes

- 3.208 Policy H1 indicates that self-contained housing is the priority land use of the Plan, while policy H3 resists proposals involving the net loss of two or more homes. Given this priority, we will resist proposals for student housing which involve redeveloping two or more self-contained homes, or the development of a site allocated for self-contained homes in the Camden Site Allocations document. We will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented.
- 3.209 The Council separately monitors net additions to self-contained homes, student housing, and other non-self-contained homes. Over the last five years, approximately a third of the additional homes monitored have been spaces in student accommodation. As indicated in connection with policy H1, the Council is concerned that pressure for development of additional student housing could severely constrain the availability of sites for self-contained housing. Consequently, the Council will resist proposals for student housing that would prejudice our ability to meet the annual target for additional self-contained homes, having regard to their impact on the supply of land for self-contained housing, whether we are meeting our target for additional self-contained homes, and whether the sites involved have particular characteristics and constraints that make them more suitable for student housing or self-contained homes. In some cases, we may seek a mix of student housing and self-contained homes on the same site.
- 3.210 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation, which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. We will resist proposals for student housing that fail to comply with the relevant minimum standards.

Meeting the needs of a variety of institutions and students

- 3.211 The Council is keen to support publicly-funded Universities based within the borough, and will expect new student housing in Camden to provide spaces for students studying there, whether the housing is developed directly by the

Universities or by independent providers. However, we recognise that there are a number of other Universities very nearby, particularly in Westminster. Where new student housing is proposed we will negotiate planning obligations to ensure that the term-time occupiers are students at one or more recognised institutions, which will generally be institutions supported by the Higher Education Funding Council for England (HEFCE) and based in Camden or an adjoining borough.



- 3.212 As noted in paragraph 3.203, there are a number of other colleges in the borough that help to support Camden's international academic reputation. The final report of the Mayor's Academic Forum 2014 estimated that 14% of London's full-time students could be at colleges of this type. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in Camden Planning Guidance 2: Housing supplementary document.
- 3.213 Draft Further Alterations to the London Plan indicate that student housing should be affordable to the student body as a whole. The final report of the Mayor's Academic Forum 2014 highlighted affordability as an issue, noting that independent providers may charge £300 or more for a room, estimated at twice the rent that would be affordable on the basis of a student loan. The median rent for a studio flat in Camden in mid-2014 was £240 per week (VOA data in the GLA Rents Map). As indicated in paragraph 3.205, the Council considers that additional designated student housing can help limit pressure on the wider private rented market, but to do so the rooms will need to be available at a rate that is competitive with the wider market.
- 3.214 To ensure that a proportion of student housing is available at competitive rates, we will:
- expect student housing developments to include clustered study-bedrooms with some shared facilities;
 - prevent lease or sale of the accommodation as general market housing;
 - wherever possible tie occupation to students attending a specified institution or institutions; and
 - where specific institutions are not specified, subject to viability expect student housing developments to include an element of student accommodation that is affordable in the context of average student incomes and rents for comparable accommodation provided by Camden based Universities.

- 3.215 In accordance with policy H6, the Council also expects 10% of designated student housing to be suitable for occupiers who are wheelchair users.
- 3.216 The Council will use design mechanisms, conditions and planning obligations to meet these expectations, and provide additional details of how they will operate in Camden Planning Guidance 2: Housing supplementary document.

Location of student housing

- 3.217 In two of Camden's Central London wards, students now account for around a third of the population (Census 2011, 18+ full-time students at term time address as a share of usual resident population). Consequently, the Council supports the proposal for greater dispersal of additional student housing in the Further Alterations to the London Plan, both within the borough and more widely through London. However, a number of factors will be considered when assessing whether locations are appropriate for student housing.
- 3.218 Like all housing, student housing should be located so that its occupiers have access to public transport, workplaces and services. The advent of UK student loans has made access to workplaces all the more important, as almost a fifth of Camden's full-time students are in employment (Census 2011, 18+ students at term time address). Services such as GPs and sports facilities are also more likely to be required for locations remote from campus based provision in Central London.
- 3.219 Student housing can have a significant impact on a single public transport route, particularly where development towards the north of the borough serves the cluster of Universities in Bloomsbury and the Central London Area. Consequently we will expect student housing to be located within cycling distance of the institutions it serves, or to be accessible to them by public transport services. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations or CIL as appropriate.
- 3.220 The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations in some parts of Camden. Students are sometimes perceived as short-term residents with little connection to the established community. Specific concerns can include noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community. Where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures such as management plans, and will resist proposals where mitigation is not possible.

Protecting existing student accommodation

- 3.221 Given the anticipated growth of full-time students attending higher education institutions in the borough and the potential for pressure on the wider private rented stock, we will seek to protect existing student housing, including housing managed by education institutions and independent providers unless it has been

replaced or there is no longer a demand for it. Where the loss of student housing is justified, alternative development should provide an equivalent amount of permanent and self-contained housing in accordance with policy H3, and include an appropriate contribution to affordable housing in accordance with policy H4.

3.222

Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, we will assess proposals involving its loss on the basis of policy H10 rather than policy H9.

Housing with shared facilities (‘houses in multiple occupation’)

- 3.223 A house with shared facilities or a house in multiple occupation generally refers to a flat or house that is the main residence for three or more occupiers forming two or more households and who share a kitchen, bathroom or toilet. A household is generally a family (or people with relationships equivalent to a family). The properties covered by policy H10 mostly take the form of homes let to a group of friends, homes let room-by-room to unrelated individuals, or properties formally divided into bedsits, but also include other types of accommodation where facilities are shared if the occupiers live there long-term (e.g. hostels for migrant workers).
- 3.224 Policy H10 specifically relates to types of housing such as:
- houses and flats shared by a 3-6 occupiers who do not live as a family but share some facilities such as toilets, bathrooms and kitchens (small houses in multiple occupation or HMOs, Use Class C4) – although different policies apply in different circumstances as set out in paragraph 3.226;
 - houses or flats shared by 7 or more occupiers who do not live as a family but share some facilities such as toilets, bathrooms and kitchens (large houses in multiple occupation or HMOs, outside any planning use class); and
 - other accommodation with shared facilities where people live long-term, often designated for particular groups, but excluding designated student housing and housing for older people, homeless people and vulnerable people (outside any use class).
- 3.225 Other policies contain specific provisions for some kinds of housing with shared facilities:
- key-worker accommodation such as nurses’ homes and hostels is considered in policies H4 and H5;
 - housing for older people, homeless and vulnerable people is considered in policy H8;
 - student housing is considered in policy H9;
 - self-contained houses and flats occupied by a single household are considered in policies H3, H4, H6 and H7; and
 - provisions for hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in policy E3.
- 3.226 For most purposes we will treat small houses in multiple occupation (Use Class C4) in the same way as self-contained homes (Use Class C3), to reflect the freedom provided in legislation for changes between these two uses without a planning application. However, where new small homes in multiple occupation are proposed in order to create a long-term addition to the supply of low cost housing, we will consider using planning conditions to remove the freedom to change to self-contained homes without an application. Where the freedom to change from Use Class C4 to Use Class C3 has been removed (e.g. by a planning condition) we will apply policy H10 and resist the loss of small houses in multiple occupation.

- 3.227 The preceding paragraphs should not be regarded as providing detailed definitions or accounts of the legal position. Planning use classes are set out in The Town and Country Planning (Use Classes) Order 1987 (as amended). Provisions relating to licensing of some types of housing are set out in the Housing Act 2004 and related secondary legislation.

Policy H10 Housing with shared facilities ('houses in multiple occupation')

The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.

We will support development of housing with shared facilities (houses in multiple occupation) provided that the development:

- a. will not involve the loss of two or more self-contained homes;
- b. will not involve land identified for self-contained housing through a current planning permission or a development plan document;
- c. complies with any relevant standards for houses in multiple occupation;
- d. contributes to creating a mixed, inclusive and sustainable community;
- e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and
- f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to policy H4.

We will resist development that involves the net loss of housing with shared facilities (houses in multiple occupation) or the self-containment of any part of such a housing unless either:

- g. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; or
- h. adequate replacement housing with shared facilities will be provided that satisfies criteria (a) to (f) above; or
- i. the development provides self-contained social-affordable rented homes.

Where the Council is satisfied that a development involving the net loss of homes with shared facilities is justified, we will expect the development to create an equivalent amount of residential floorspace for permanent housing in Use Class C3, secured as a long-term addition to the supply of low cost housing, or otherwise providing an appropriate amount of affordable housing, having regard to policy H4.

- 3.228 The 2011 Census identified 700 homes in the borough that are shared by separate households, providing homes for over 3,000 individuals or households in total. These are likely to be primarily properties where rooms are let separately to unrelated individuals. On the basis of housing stock data, we estimate that at least 2,300 further homes are being shared by groups who do not form a family. The 2011 Census recorded more than 31,000 households living in privately rented accommodation, and it is likely that more than a quarter of these are in a home where they share facilities with an unrelated individual or household.

3.229 Data from the London Rents Map (May 2014) indicates that in Camden rents for a room are typically around 70% of the cost of a studio flat and 50% of the cost of a 1-bed flat. Consultation on Camden's private rented sector suggests that significant proportions of shared accommodation are occupied by students, single males, 40 to 60 year olds, and people who are low wage earners or unemployed. Few single people and couples without children are eligible to be housed by the Council. Single people under 35 can only claim for the cost of a bedsit or room in shared accommodation. Many of the households in shared accommodation would not be able access or afford self-contained accommodation.

Additional housing with shared facilities

3.230 Given that planning legislation provides freedom for changes in either direction between self-contained homes in Use Class C3 and small houses in multiple occupation in Use Class C4, the sector has scope to expand and contract in accordance with relative demand in each sector. Consequently, aside from housing designated for particular groups (such as students and older people), the Council does not currently anticipate a significant number of proposals for development creating new homes with shared facilities. Nevertheless, given the rapid growth of the private rented sector in the borough there is certainly potential for new types of shared accommodation to emerge, such as accommodation modelled on student housing but available to a wider range of occupiers. Consequently policy H10 provides criteria for assessing such proposals. Further details will be provided in Camden Planning Guidance 2: Housing supplementary document as appropriate.

3.231 Policy H1 indicates that self-contained housing is the priority land-use of the Plan, while policy H3 resists proposals involving the net loss of two or more homes. Given this priority, we will resist proposals for houses in multiple occupation which involve redeveloping two or more self-contained homes, or the development of a site allocated for self-contained homes in the Camden Site Allocations document. We will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented. With the exception of student housing, there is no recent history in Camden of significant new build development for homes with shared facilities, and no reason to suppose that it will prejudice the Council's ability to meet our target for additional self-contained homes.

3.232 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation and other homes with shared facilities. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. We will resist proposals that fail to comply with the relevant minimum standards.

3.233 We will consider whether proposals could reduce mix, inclusivity and sustainability of a neighbourhood, for example whether large-scale accommodation or additions to an existing concentration could skew the population towards particular groups or lifestyles. We will also consider the potential for harm to nearby residential amenity, for example from residents congregating in outside areas close to other homes. Where appropriate we will seek a planning obligation to protect amenity, for example by securing a management plan.

- 3.234 The Council's priority land-use is self-contained housing, which is generally required to provide affordable housing. Policy H10 therefore includes measures to ensure that financial viability is not tilted towards development of housing with shared facilities. We support continued provision of housing with shared facilities for people with low incomes, and where proposals are intended for low-income occupiers with we will negotiate planning obligations to ensure that housing is available to low income occupiers in the long-term. However, new forms of housing with shared facilities could potentially be aimed at providing high density Central London living for relatively wealthy young people, with facilities such as gyms, swimming pools and restaurants. Where proposals come forward that cannot be secured for low income occupiers, we will seek provision of an appropriate amount of affordable housing in accordance with policy H4 taking account of the additional residential floorspace proposed and its capacity for self-contained homes.



Existing housing with shared facilities

- 3.235 The Council protects housing with shared facilities because many individuals and couples in Camden would be unable to access or afford anything else (see paragraph 3.229). Despite this protection, there are some indications that the number of homes with shared facilities has diminished in recent years. Estimates based on the Private Sector House Condition Survey 2004 suggest that 11,000 households were living in bedsits or other shared accommodation, predominantly in the private rented sector. More recent data in paragraph 3.228 suggests that this number could have halved. Developments leading to a loss of housing with shared facilities have tended to involve either self-containing the existing bedsits (putting pressure on internal space by adding facilities for personal use), converting the property into larger flats, or creating a single large dwelling for one household.

- 3.236 The gap between rents for studio flats and rents for rooms in shared accommodation indicates that rents for bedsits will increase as a consequence of self-containment (not necessarily rents charged to existing tenants, but certainly rents charged to new ones). Self-containing bedsits therefore reduces the amount of accommodation available to single people and couples with the lowest incomes. Self-containment also tends to involve the loss of access to previously shared spaces, such as kitchens, sitting rooms or gardens, laundries and drying areas, and bathrooms containing a bath. However, the bedsit itself is rarely large enough to contain a full range of facilities, or to provide space to socialise with visitors.
- 3.237 The Council's minimum space standards for houses in multiple occupation, set under the Housing Act 2004, provide for single rooms as small as 9 sqm and double rooms as small as 11 sqm. Additional space is required where kitchen facilities, baths/ showers or toilets are provided in the room so that occupiers can move around and use them safely. The Council's standards would require at least 4.2 sq m to be added if the room contains kitchen facilities, a wash basin, a shower and a toilet, but this would not be sufficient for all the facilities tenants would often expect, such as freezers and washing machines. The Government's draft nationally described space standard is much more demanding, with 37 sqm proposed as the minimum standard for a self-contained flat. The limited space in existing bedsits means that self-containment tends to create hazards, such as conflict between cooking facilities and beds or doors.
- 3.238 Converting a home with shared facilities into a single large dwelling or a number of flats larger than the existing bedsits would reduce the amount of accommodation available to small households on low incomes, and would also be likely to reduce the number of people occupying the property. Homes with just one room for sleeping tend to be the most densely occupied as they have no further bedrooms to leave vacant. Camden's Survey of New Housing 2002-2008 did not include bedsits, but found that the number of occupiers per bedroom for studio and 1-bedroom homes was significantly higher than the number in larger homes. Notably, 3-bedroom homes had an average of less than one occupier per bedroom.
- 3.239 Nevertheless, the Council is actively working to improve the quality of accommodation in the private rented sector, particularly houses in multiple occupation. Where such properties do not meet current standards, are in serious disrepair, or have a history of vacancy, we will assess the form of renovation or development best able to provide residential accommodation of reasonable quality, and may accept self-containment in some circumstances. The Council will consider the extent of the works required to meet contemporary standards, their likely impact on any designated heritage assets, the cost of restoring the property to use (having regard to any fixtures and fittings removed from the property by the owner), the potential rental return from the property, and the prospect of investment coming forward to make the property suitable for occupation as housing with shared facilities.
- 3.240 In the past, Camden's policies for development of self-contained homes have required provision of affordable housing, but no similar policies have applied to housing with shared facilities. Consequently where we consider that proposals for self-containment of shared accommodation are the best option, we will seek appropriate provision of affordable housing or other low cost accommodation.

The Council will generally favour solutions that secure long-term provision of housing suitable for small households with limited incomes. Where there is a long history of vacancy we may agree arrangements that secure the availability of some or all of the property for homeless or vulnerable people for a fixed period. Where we are unable to secure low cost housing for small households, homeless people or vulnerable people, we will seek provision of an appropriate amount of affordable housing in accordance with policy H4. Further details will be provided in Camden Planning Guidance 2: Housing supplementary document as appropriate.

- 3.241 Proposals to replace existing bedsit accommodation, or other housing with shared facilities, usually involve relocating it into an existing self-contained dwelling, and converting the shared accommodation into one or more larger self-contained homes. Such swaps can help a developer or owner to meet a demand for self-contained accommodation in a particular location, provide bedsits in a property that can more easily meet contemporary standards, and/ or maximise the value of dwellings in their control. The Council will not resist such swaps as long as the replacement bedsits are in an appropriate location, represent equivalent or better accommodation (in terms of the number of bedsits, the floorspace, and the standard of facilities and amenities), and are secured by a planning obligation.
- 3.242 There is a small stock of social rented housing in the borough that takes the form of bedsit rooms with communal facilities. Small homes are over-represented in this sector, and bedsits are very unpopular with tenants, especially since they will be sharing facilities with people they don't know, often people classed as vulnerable people and sometimes people with challenging behaviour. The Council therefore supports development of social rented accommodation with shared facilities to create self-contained social-affordable rented homes, subject to the self-contained homes meeting appropriate space standards.
- 3.243 In some cases, properties in Camden have been subdivided into flats that are not self-contained because the layout of entrance halls and staircases made self-containment difficult or costly. Where these properties are not let out as bedsits and only share circulation spaces, they do not form housing with shared facilities, and the Council will not resist proposals to convert the properties into wholly self-contained flats provided that they are able create homes of a reasonable layout and quality. Where such proposals would result in a loss of homes, they will be considered against policy H3.

Accommodation for travellers

3.244 The Council recognises that gypsies and travellers within the borough have established connections with local social networks and services. There are five gypsies and travellers pitches in Camden (at Carol Street and Castlehaven Road), and a single site providing a five plots for travelling show people (the North Fairground Site at the Vale of Health). The Council will protect these sites from change to alternative uses unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations, or are demonstrably no longer needed.

3.245 For planning purposes, Camden will use the government's definitions of gypsies, travellers and travelling showpeople set out in the 'Planning policy for traveller sites' March 2012 and any subsequent national guidance. In the current guidance:

- 'Travellers' means 'travelling showpeople' and 'gypsies and travellers';
- 'Travelling showpeople' are members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such);
- 'Gypsies and travellers' are other persons of nomadic habit of life whatever their race or origin;
- in all cases, people are still included if they have ceased to travel, for example due to health or education needs.

Policy H11 Accommodation for travellers

The Council will aim to secure a sufficient supply of pitches/ plots to meet the needs of existing and future households of travellers including gypsies and travelling showpeople.

We will protect existing lawful sites, plots and pitches for travellers. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, pitches and/or plots in suitable locations, or are demonstrably no longer needed.

We will identify deliverable sites to meet or exceed Camden's projected need for two to seven additional pitches for gypsies and travellers by 2020/21 and seek to identify developable sites or broad locations to meet Camden's projected need for a further 7 to 9 additional pitches by 2030/31.

New sites, pitches and/or plots for travellers should:

- a. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
 - b. be capable of connection to energy, water and sewage infrastructure;
 - c. provide safe access to and from the main road network;
 - d. support the health and well-being of the occupiers;
 - e. provide an appropriate layout and facilities;
 - f. be attractive and of the highest design quality; and
 - g. protect local amenity and the environment.
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- 3.246 The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (the Accommodation Assessment) indicated that up to 16 additional pitches could be required for gypsies and travellers by 2031. This is made of up households on the waiting list for pitches and the anticipated growth in the number of households from 2013 to 2031. Households on the waiting list include a number of households who currently live on an overcrowded site and do not have their own pitch, and a number of households who currently live in bricks and mortar homes.
- 3.247 The Accommodation Assessment does not establish whether all the households in bricks and mortar homes have a housing need or a nomadic habit of life. Consequently, the Plan presents the need for additional pitches as a range. Based on the history of overcrowding at one of the existing sites, we have identified an immediate need for one additional pitch, assessed the minimum need as two additional pitches by 2021 (with a maximum of seven) and a total of nine additional pitches by 2031 (with a maximum of 16).
- 3.248 The Accommodation Assessment also considered the needs of travelling showpeople. The Accommodation Assessment concluded that two plots are unoccupied and there is no evident need for additional plots for travelling showpeople.
- 3.249 We will aim to ensure that new sites/ pitches are both adequate and appropriate to the needs of the gypsy and traveller communities and integrated with adjoining communities. All proposals for sites, plots and pitches for gypsies, travellers and travelling showpeople, whether identified by the Council or proposed independently, should meet the criteria set out in the policy. Proposals will also be expected to satisfy all other relevant Local Plan policies, including those relating to the impact of development and the protection of green infrastructure.
- 3.250 The Council is currently exploring opportunities for the creation of additional pitches for gypsies and travellers. Given the connection between Camden's gypsy and traveller community and local support networks, options could potentially include improvements to existing sites to increase capacity, and new pitches located broadly in the same areas of the borough as the existing sites.
- 3.251 We will keep the accommodation needs of travellers under review, taking into account any changes to national or regional policy and guidance, and the outcome of cross-boundary cooperation. The Council will particularly seek a fuller understanding of the needs of gypsies and travellers currently living in bricks and mortar homes.
- 3.252 Providing more pitches for travellers will help us to deliver the Camden Plan, tackling inequality and creating sustainable and resilient neighbourhoods by relieving the community's overcrowding, improving travellers' health and well-being and improving potential for children and young people to take advantage of education and training opportunities. Providing more pitches will also help us to ensure the right housing for Camden's diverse communities in line with the recommendations of the Equality Taskforce.

4. Community, health and well-being

Improving and promoting Camden's health and well-being

- 4.1 There is an important link between the physical and social environment in which we live and how healthy we are, both physically and mentally. Improving our health and well-being requires more than improving access to medical treatment and services. This policy contributes towards the promotion of improvements that can positively improve the health and well-being of the local community.
- 4.2 Camden has one of the largest health inequality gaps between occupational groups in England for both men and women and there are stark geographical health inequalities in Camden. People suffering from poor general health, mental ill health and low life expectancy are generally concentrated in the borough's most deprived wards including St Pancras and Somers Town, Haverstock and Kilburn. In contrast, residents in the most affluent parts of the borough have longer life expectancy, better general health, and fewer mental health problems than the England average.

Policy C1 Improving and promoting Camden's health and well-being

The Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment, with local services to support health, social and cultural well-being.

We will require:

- a. development to positively contribute to creating high quality places that supports healthy communities; and
- b. proposals for major development schemes to include a Health Impact Assessment (HIA) or checklist.

We will:

- c. contribute towards the health priorities of the Health and Well-being Board and partners to help reduce health inequalities across the borough;
 - d. support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements; and
 - e. protect existing health facilities in line with policy C2 - Community facilities and leisure.
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Camden's health priorities

- 4.3 The Camden Health and Well-being Board (HWB) brings together the NHS (Camden GP Clinical Commissioning Groups), local authority cabinet members, public health and other local authority directorates and health watch, to plan how best to meet local health and care needs and influence the commissioning of services. Camden's refreshed Joint Health and Well-being Strategy (2014-2017) is currently out for consultation and sets out the Board's priorities:

- Healthy Lives - extending the previous priorities of supporting action on overweight and obesity ('healthy weight healthy lives') and alcohol-related harm to include other lifestyle factors such as smoking, physical activity, drugs and sexual health, as well as the 'wider determinants of health' such as housing, employment and education, all of which are fundamental to enabling residents to have positive health and well-being and reducing health inequalities over the longer term.
- Mental health and well-being – Camden's population experiences high levels of mental health need. There are opportunities to strengthen individual, family and community resilience to protect and promote mental health and well-being across the borough, as well as building upon our well-performing mental health services. The HWB will work with partners to realise these opportunities, in addition to challenging the stigma and discrimination associated with mental health problems, and ensuring that mental health and well-being receives equal weighting to physical health across Camden.
- Continuing to strengthen the integration of health and social care – taking action to enable people with existing health problems to live life to the full, maximise their potential and to make the health and social care systems work better for them. Providing more integrated care and support will enable people to be independent, resilient and part of a community. Alongside this, the HWB will use its unique position and influence to support and promote implementation of the Better Care Fund to reduce emergency hospital admissions.

4.4 These priorities are underpinned by the Camden Joint Strategic Needs Assessment (JSNA).

Role of planning in health and well-being outcomes

4.5 The creation of healthy environments for people of all ages across the borough will be a key consideration when the Council assesses any planning application. A healthy environment can promote and encourage healthy lifestyles and these are aided through strong urban design, green open spaces and access to sustainable transport. Planning can play a pivotal role in influencing all of these key health determinants, especially towards improving long-term outcomes and addressing health inequalities.

4.6 To ensure that development promotes and positively contributes to a healthy living environment, development will be expected to consider health outcomes at an early stage, prior to the submission of a planning application. This will be evidenced through the submission of a Health Impact Assessment (HIA) or checklist, to be submitted with all major planning applications. The HIA or health checklist should identify the likely health impacts of new development and include measures to improve health outcomes and address negative effects. Further information on HIA can be found in Camden Planning Guidance 6: Amenity supplementary document.



- 4.7 Many measures set out in other parts of this Local Plan play a part in promoting health and well-being and addressing health inequalities, in particular:
- Housing quality – there are a number of factors that contribute to the quality of housing, these include (but not restricted to), accessibility, space and layout, fabric energy efficiency and noise insulation. As part of the Council's Community Investment Programme (CIP) we are undertaking widespread estate regeneration and works to existing homes to ensure that the Council tenants live in good quality accommodation that meets contemporary standards. This programme will also generate funds for the Council's 'Better Homes' initiative which refurbishes existing Council homes.
 - Access to healthcare services and other social infrastructure - policy C2 recognises that community facilities such as schools, community centres and health centres are a vital part of the infrastructure supporting Camden's quality of life. We will seek to ensure that community facilities and services are developed and modernised in a way that is sustainable, and retained for the benefit of communities in Camden.
 - Access to open space and nature – the benefits of open space are seen to be particularly important for physical exercise, relaxation and stress relief, reducing pollutants and cooling the urban heat island and providing areas for local volunteer groups and food growing (policy A2). We will protect, maintain and enhance Camden's parks, open spaces and green corridors and seek to tackle deficiencies and meet increased demand for open space.
 - Air quality, noise and neighbourhood amenity – policies CC4, A1 and A3 recognise that development can have a significant effect upon the amenity, health and well-being of those who live, work and visit the borough. We will only grant permission for development that does not cause harm to amenity or/and would cause harm to air quality unless appropriate mitigation measures are adopted.

- Accessibility and active travel – active travel, such as walking and cycling, is one of the easiest and most cost effective means for people to achieve substantial health benefits. The transport policies prioritise sustainable transport such as, walking, cycling and public transport and have established a road user hierarchy to reflect the importance of these modes.
- Crime reduction and community safety – crime and fear of crime is a significant concern for many of Camden’s residents and businesses and can undermine people’s quality of life, health and well-being (policy C4). We will require development to demonstrate it has incorporated design principles which contribute to community safety and security.
- Access to work and training – we want residents to benefit from the employment opportunities created by Camden’s economic success by linking the efforts of the Council, schools and employers to provide local people with the skills needed to gain employment. We will seek to reduce inequality through training and apprenticeship schemes and affordable space for small and medium enterprises (SMEs) managed by businesses, higher education institutions and the third sector.
- Social cohesion and lifetime neighbourhoods – policy D1 recognises the significant link between improving physical and mental well-being by creating streets, spaces and buildings which allow for and encourage healthy lifestyles.
- Climate change and minimising the use of resources – there are links between poor health and well-being and the ability to heat a home cost effectively, or in hot weather ensure that the property does not overheat. Policies CC1 and CC2 will seek to ensure that buildings are designed to be more energy efficient and to cope with changes to our climate system such as wetter winters and hotter summers.

4.8 Health should not be seen as an isolated topic when assessing planning applications, rather it should be integrated as per the areas noted above. This approach has been adopted in this plan where we have considered the impact of our policies upon the physical and mental health and well-being of those living, working and visiting the borough.

Health facilities

4.9 The location and accessibility of health facilities has a direct impact on the health of the population. The Healthy Urban Development Unit (HUDU) recognises that in addition to advice on healthy living, appropriate health services, access and the quality of healthcare can prevent ill health.



- 4.10 Policy C2 specifically states that we will resist the loss of community facilities (which include health), unless a replacement facility that meets need is provided or where evidence demonstrates that the facility, or similar facility, is no longer required. We will also require contributions towards supporting existing or providing for new facilities from developments that result in additional need for community facilities, such as those for health. The Council will map health facilities in Camden that are in need. These will be included in Camden Planning Guidance 6: Amenity supplementary document.
- 4.11 Camden has a wide range of health facilities, with four major hospitals, 38 GP practices and over 150 other facilities, such as dentists, optometrists, and pharmacists. Policy DM1 - Delivery and Monitoring and Appendix 1 set out the infrastructure requirements for the borough over the Plan period, including many that relate to improving health.

Community facilities, culture and leisure

- 4.12 Community facilities such as schools, community centres and health centres are a vital part of the infrastructure supporting Camden's quality of life. They support the provision of services which are often essential and can be a lifeline for the least well off in society. These facilities are under pressure from reductions in public sector funding, the impact of continuing growth in population and changing expectations. While there are opportunities to provide some services more effectively at home or online, physical infrastructure will remain one of the main ways in which services can be accessed.
- 4.13 The Council has an ambitious Community Investment Programme that is redeveloping and upgrading buildings, seeking ways in which services can co-locate (i.e. providing access to complementary services from one building or site) and enabling more modern and responsive ways of working. In order to maximise efficiencies and improve access, there will be circumstances in which the loss of floorspace will be outweighed by the benefits of a more modern facility. We also need to take into account the demand further increases in population will place on the availability and accessibility of community facilities. In particular, we will need to ensure that new community facilities can help address inequalities in the borough.
- 4.14 Some community facilities are important in supporting social capital, providing spaces for social interaction and the holding of meetings and events. Many of our neighbourhoods enjoy the benefits of a community hall. As well as facilities serving local catchments such as GP surgeries and dentists, nationally important institutions for health and learning are based in the borough. A particular challenge in Camden is the very diverse needs of our population, incorporating some of the most deprived communities in the country and an exceptionally high proportion of young people studying at further and higher education colleges and universities.
- 4.15 Camden sustains a vibrant and internationally important cultural scene which greatly adds to the attraction and distinctiveness of the borough. This includes a remarkable diversity of performing arts venues, museums and specialist facilities which often help to define the surrounding character. These facilities host material to suit all tastes and ages and crucially, provide a launchpad for ideas and talent which can go on to enjoy wider success. The depth and energy of the cultural provision has in turn, driven expansion of creative industries and further and higher education in the borough, including institutions specialising in the arts. In the West End and Camden Town in particular, theatres and music venues help to support other uses associated with the evening and nighttime economy. There are also a dispersed range of facilities providing a more specialist or community role.
- 4.16 This chapter addresses the wide range of community facilities which would normally be found in any community such as, childcare facilities, provision for education and training, youth clubs, libraries, places of worship. It also seeks to safeguard the provision of cultural and leisure facilities in the borough. This

chapter is complemented by more detailed policy found elsewhere in the Plan on open space, sports facilities and public houses.

Policy C2 Community facilities, culture and leisure

The Council will work with its partners to ensure that community facilities and services are developed and modernised in a way that is sustainable and retained for the benefit of communities in Camden. This includes:

- a. using pupil place projections to identify the need for additional pupil places which could be met by a combination of improving existing facilities and new school provision (including extensions to schools). As part of the Community Investment Programme (CIP) the Council aims to invest £117 million into 53 schools and children's centres. The Council also aims to provide 963 new school places, 420 delivered by CIP funding and 543 through council projects with investments from other sources;
- b. supporting the further and higher education sector in Camden and balancing its requirements with those of other sectors and the local community. In assessing applications for further and higher education use, the Council will ensure that such developments are sensitive to their surroundings, take into account the cumulative impact on the balance and mix of uses in the area, the contribution made to the 'knowledge quarter' and protect residential uses, the local environment and the amenity of, and services for, the residential community and other users of the area and their future needs;
- c. supporting the Metropolitan Police, London Fire Brigade and London Ambulance Service and their plans to deliver a more efficient and effective service with modern facilities; and
- d. providing a range of other community facilities to support Camden's growing population.

To help to meet increased demand for facilities, we will expect:

- e. developments that result in any additional need for community or leisure facilities to contribute towards supporting existing facilities or providing for new facilities;
- f. suitable developments to make rooms available for local community groups to use or hire at a discounted rate, particularly where a development displaces or replaces a community facility; and
- g. 'smarter' facilities with sufficient high speed digital infrastructure to enable connectivity with wider networks.

We will seek to resist the unnecessary loss of community facilities. Where the loss of a facility is proposed, including in part, the Council will take the following into account:

- h. whether a replacement facility is provided on or off-site of the same or better size and quality that meets the needs of the local population; or
- i. evidence which demonstrates that there is no need for the specific community facility or that it is no longer viable. In such a circumstances, we will expect the site or building to be reused for other community services unless it can be demonstrated that this is not possible. Where this is successfully demonstrated the Council's preferred new use will be affordable housing, subject to the Local Plan's affordable housing threshold.

Cultural facilities

- j. We will protect the borough's unique and diverse range of cultural facilities, including music venues and theatres, in recognition of their cultural and economic benefit to Camden and London.

Sports and leisure facilities

We will protect existing sports and leisure facilities by resisting their loss unless:

- k. there is no realistic prospect of the site or building continuing to meet a sports and/or leisure need in the local area.

New community, cultural and leisure uses will be supported where the site or buildings are:

- l. appropriate for their intended use and accessible to the community they serve;
- m. accessible by a range of transport modes, in particular walking, cycling and public transport; and
- n. located in the Central London Area or in the Town Centres of Camden Town, Swiss Cottage/Finchley Road, Kilburn, West Hampstead or Kentish Town if they are expected to attract larger numbers of visitors.

New community facilities must be provided in buildings which are flexible and sited to maximise the shared use of premises.

School provision

- 4.17 The Council aims to provide a high standard of education and training for everyone. We will aim to ensure that developments contribute to schoolplace provision where there is a need. Education contributions will be used to improve capacity and expand education provision. Examples include providing additional education places, adapting and extending educational buildings or purchasing new equipment required to meet additional demands. Funds may also be used for extracurricular facilities where local pressures arise e.g. related sports and after school clubs and play centres. Continuing to modernise and invest in the quality and accessibility of school facilities will clearly be an important factor in supporting improvements.
- 4.18 The Council's highest priorities for schools are ensuring enough school places are available using school place planning analysis and improving the physical condition of school buildings. The Community Investment Programme is a 15 year plan to reinvest money from the sale or redevelopment of properties that are out of date, expensive to maintain, or underused, or difficult to access, into schools, homes and community facilities. The creation of the Netley Campus is one of the projects being delivered through the programme with new school facilities for the existing nursery, Netley School, Pupil Referral Unit and Adult Community Learning Centre.
- 4.19 The table of key infrastructure programmes and projects in Appendix 1 provides more details on planned education schemes.

Adult learning

4.20 The Council, together with many external providers, offers a wide range of adult and community learning that help people back into work, enabling volunteering, development of skills and better long-term prospects. Learning providers include the City Lit Institute, Mary Ward Centre, Westminster Kingsway College and Birkbeck College, Working Men's College and Worker's Educational Association. Many of the courses improve people's confidence and well-being and allow marginalised priority groups access to training and employment. We will continue to support the provision of facilities to provide an increasingly diverse range of courses and activities. It is recognised that a variety of different venues will continue to host adult and community learning including community centres, libraries and local cultural institutions, such as the British Museum and British Library.

Higher and further education

- 4.21 Camden has a vibrant higher education sector. Many of these facilities are clustered in Camden's Central London Area. Some of the institutions and associated schools and faculties are of international standing and attract students to the borough from around the world. This includes: University College London (UCL), UCL Hospital, the School of Oriental and African Studies, Birkbeck College, the Central School of Speech and Drama and the School of Pharmacy which joined UCL in 2012. One of the two campuses of the Royal Veterinary College is situated in Royal College Street, near to St Pancras station.
- 4.22 The University of the Arts London was established in 2004 drawing together six colleges within the fields of art, design, fashion, communication and performing arts. Two of the colleges have sites in Camden – Central St Martins providing art and design education from Granary Square at the heart of the King's Cross redevelopment and the London College of Fashion, specialising in fashion education and research, which is based at a site in High Holborn.
- 4.23 Camden Council is supporting the development of a 'knowledge quarter' focussed on Euston which supports the clustering of medical research, knowledge, innovation and creative industry. The seamless flow of knowledge between higher education and high value enterprise is greatly enhanced by their spatial proximity.
- 4.24 Further education is provided through schools and specialist providers. Westminster Kingsway provides a range of courses for academic and vocational courses at all levels for 16-19 year olds including BTEC, A-Level and Apprenticeships. They also provide a range of adult learning and some HE programmes. Fine Arts College Hampstead provides a range of arts and humanities courses for young people seeking admission to fine arts colleges and university. There are also a number of language schools which contribute to the education and training of students from further education facilities abroad. The schools help in building cultural links between students and their families within Camden and may encourage skilled young people to seek work in the borough later in life.
- 4.25 While higher education facilities are very important to the economy and social diversity of the borough, in some areas their extensive presence can have a harmful impact. The Council will assess applications for higher education use

against the criteria set out in policy C2. This assessment will also apply to further education facilities which support existing higher education facilities within Camden or its adjoining boroughs.

Policing and emergency services

- 4.26 As with other public sector providers, the Metropolitan Police Service (MPS) is seeking to reduce the operational running costs of facilities by making the best use of accommodation and disposing of surplus properties. This will include greater co-location and clustering of police functions. The MPS business plans and estate strategy provide further detail. The London Fire Brigade has three stations in Camden – Euston, Kentish Town and West Hampstead. Early in the Plan period, the Fire Brigade wish to see the Kentish Town station redeveloped and the other stations refurbished.

Facilities for children and young people

- 4.27 There are around 45,000 children and young people in Camden aged 19 and under: 21% of the total population. There is a high demand on children's services in the borough, linked to poverty and deprivation. The 'Change for children' strategy sets out how Camden Council and partners can deliver better services for children, young people and families. This includes improving access to services through more integrated provision e.g. children's centres and schools acting as hubs for delivering health services.
- 4.28 There are a wide range of nursery education and childcare options across Camden. This includes the 14 children's centres, all of which provide childcare and nursery places. The Council is also looking at ways to increase nursery and childcare provision which is essential if parents are able to secure work and training. The Council will encourage non-residential developments to include provision for child care facilities in suitable locations.

Facilities for older people

- 4.29 Older people in Camden generate the greatest demand for health care, social care and support services. An increasing amount of care is taking place at home with people staying in their homes longer, although there will still be a requirement for day centres, long-term care homes, nursing care homes and extra-care sheltered housing. Community and voluntary sector organisations provide vital support services for older people. For many, local community centres and cultural centres are the main source of support, particularly for people from ethnic minorities. The centres support social activity and provide help and advice for dealing with life's difficulties.

Faith facilities

- 4.30 Camden has many meeting places, churches, synagogues, temples, community facilities and prayer centres that cater for a range of faiths and beliefs. It is expected that further provision will be required to meet the needs of faith communities during the Plan period. The main sources of demand come from the inadequate size of Islamic prayer spaces in the borough and the growth in forms of evangelical Christianity.

- 4.31 The Council will seek to support community organisations and religious groups to help them to meet their need for faith facilities. The Council will encourage faith communities to consider sharing facilities where one community has spare capacity and another has a need for more space.



Protecting community uses

- 4.32 Community facilities provide opportunities for residents to meet, share their interests and access services such as education, health care and family support. We will protect community facilities to ensure there is a good standard of access to a range of buildings and facilities and opportunities for social interaction, including where this allows opportunities for people to meet who might not otherwise come into contact with one another. We will also encourage multi-purpose community facilities that can provide a range of services to the community in a single location or in one building.
- 4.33 The acceptability of the loss of a site or building in community use (including in part) may be justified where alternative provision is secured elsewhere of at least the same quality and capable of serving the needs of the local area. We would normally expect the same level of floorspace to be reprovided elsewhere; however, changes in the way services are provided may mean this is not appropriate in all circumstances. The Council will have regard to strategies and service plans relevant to the facility in question as well as the impact of the proposed loss on any shortfalls in the provision of community services. We will also take into account provision across Borough boundaries where it is capable of meeting the needs of Camden residents.
- 4.34 The loss of a community facility (either in part or whole) may also be accepted if there is evidence to suggest it no longer serves a need or is not viable. In this situation, the Council will expect the applicant to provide statements from relevant providers that the facility would be unable to be used by other community uses and undertake a marketing exercise and viability assessment, as appropriate,

in accordance with Camden Planning Guidance. The Council may in some circumstances request the applicant to provide further evidence relating to the facility or service in question. The preferred alternative use for the Council would be other community uses identified in this chapter and elsewhere in the Local Plan. In undertaking these tests, the applicant will also be expected to establish the potential for these uses. Where there is no likely prospect of a continuing community use, the Council will seek the provision of affordable housing, having regard to the constraints of the site and financial viability.

- 4.35 Many providers of public services, including the Council, are reorganising the way they manage their estate in order to realise efficiencies and improve the way services are delivered. The disposal of surplus properties (e.g. buildings which are expensive to run) can release value to invest in other community priorities, such as affordable housing. It is important that planning decisions have regard to the changing way in which services are being delivered in Camden and give appropriate weight to strategies seeking to deliver substantial benefits to the borough's physical and social infrastructure. Where such a strategic justification exists, the requirements for a marketing exercise and viability assessment will not apply. Increasingly community facilities, such as GP facilities and community halls, are being co-located with other social infrastructure uses leading to the delivery of complementary services in one location and lower management and maintenance costs. The co-location of housing with community facilities can provide a means of cross subsidising the provision of more modern and accessible premises and ensuring the service can operate on a sustainable basis.

Enabling the digital delivery of services

- 4.36 As part of the redesign of public services in the context of continuing efficiency savings and technological innovation, a far greater number of functions and services are becoming available online. This provides the opportunity to provide services in more flexible and responsive ways designed around the experience and needs of service users. The expansion of high speed internet connections across the borough, including wireless systems, in community locations such as schools and libraries, is an integral part of developing more sustainable communities. The Council is working with partners to help people who are less confident about using online services.

Protecting cultural facilities

- 4.37 Camden is one of the most thriving areas for the arts in Europe. The borough is home to many of the UK's leading arts and cultural institutions such as the British Museum and the British Library, as well as many theatres, galleries, dance and music venues.
- 4.38 This arts scene adds to the borough's distinctive and varied character and opportunities for people to get together and is therefore, a fundamental element to Camden's vitality and success. The concentration of facilities and supporting leisure uses, such as bars and restaurants, draws visitors from across the country and worldwide. This makes a significant contribution to the local economy. Uses such as theatres and music venues often occupy prime locations and can be vulnerable to pressure for redevelopment and conversion. This could potentially erode Camden's appeal as a destination for a dynamic, varied and

innovative range of live performance including gigs, musicals, plays, comedy, dance, opera, poetry and cabaret catering for all ages. Venues range from rooms in pubs, to studios and large capacity halls and theatres able to accommodate many hundreds of people.



- 4.39 Camden's theatres include a cluster of venues within London's 'West End'. They are an important draw for visitors and largely host mainstream plays and musicals. There are also fringe venues and freestanding venues, some with a greater community orientation and supporting experimental and radical theatre.
- 4.40 Camden is internationally renowned for having a vibrant and progressive music scene with a strong emphasis on live performance by bands. The epicentre for much of this activity is Camden Town. Some of Camden's venues have cultural importance from being instrumental in helping to break well known bands and performers. The live music scene is of great economic importance, both in its own right and its critical role in Camden's ability to attract a high level of investment from creative industries including publishing, TV and communications/PR.
- 4.41 A particular characteristic of many of the borough's cultural attractions is their heritage value. Their buildings are often landmarks of considerable distinction intended to emphasize their importance as centres of learning, discovery and pleasure. This value may be expressed through the high quality design of their facades (particularly in the West End) and interiors with luxurious decoration and detail. They are sometimes a significant feature in the evolution of a neighbourhood and its communities.
- 4.42 The Council will therefore resist the loss of theatres, music venues and other cultural facilities in accordance with policy C2 in view of their significant contribution to Camden and London's character and quality of life, their contribution to the visitor economy and, where relevant, the heritage value of buildings and their interiors. Where a replacement facility is to be provided, the applicant should demonstrate to the Council's satisfaction that the replacement

facilities are at the same standard or better than those lost and that the new location will be easily reached by the users of the facility.

Public art installations

- 4.43 Creative people come from all over the world to Camden to create and showcase their work. The Council encourages public art installations, organises workshops and provides space for local artists. Temporary pop up space has also been successfully used by creative entrepreneurs, making use of empty retail units.

Protecting and providing sports and leisure provision

- 4.44 The Council is working with partners through Pro-Active Camden (the Community Sport and Physical Activity Network) to increase participation in sport and physical activity and encourage people to lead more active and healthy lifestyles. The supply of sports provision in the borough has been analysed by the Open Spaces, Sports and Recreation Study 2014. This shows that Camden is generally well served by gyms (by both public and private sector providers) and swimming pool provision (there are four public pools in the borough, complemented by facilities at commercial leisure clubs and the lido).
- 4.45 While there are eleven 3+ court sports halls and the quality of provision is good, these facilities are unable to meet the full level of demand. Camden, as with other London boroughs, has a particularly high demand for sports facilities from students and young professionals. There is a particular challenge of ensuring there is adequate provision for all user groups including the voluntary club sector, professional athletes and participants in high growth and specialist sports. At the same time, there is the need to tackle inequalities in access by enabling non-users of services to participate in physical activity and sport for the health benefits this would provide.
- 4.46 It is likely that future demands will be met through investment in new facilities, optimising the use of existing provision in response to changing needs and priorities and the shared use of facilities e.g. on school sites. Camden is currently preparing a new indoor sports and leisure strategy. Safeguarding existing provision will also be necessary to ensure new shortfalls in provision do not arise and the need for a varied programme of sporting activity can be satisfactorily addressed. This is particularly important in an area where the costs of developing new facilities are exceptionally high.
- 4.47 We will, therefore, resist proposals which would lead to a net loss in sports and leisure provision unless it can be demonstrated that a facility is no longer required. The Council will require the submission of evidence to show it is not feasible for the facility to accommodate alternative sports or leisure activities which meet the needs of the local area. In accordance with the overall approach for community facilities, replacement provision should be at the same standard or better than that being lost, and the new location should be easily accessible for users of the facility.

Providing new facilities to meet the needs of a growing population

- 4.48 Developments can lead to increased pressure on Camden's existing community facilities and infrastructure, either cumulatively or individually. Community facilities greatly contribute to the quality of life and well-being of communities.

The Council will expect schemes that create additional demand for community facilities to make an appropriate contribution to the provision of community facilities on-site or close to the development. When assessing the impact of new development the Council will consider the likely number of future occupants of the proposed scheme, existing community facilities accessible to the development and their available capacity and the needs of community service providers operating in the area (public and community).

- 4.49 We will expect new community, cultural and leisure facilities to be conveniently located to the people who use them. Central London and our town centres are appropriate locations, particularly those that may attract large numbers of people, as they are generally reached by a range of transport modes. New facilities should be appropriate to their surroundings in terms of scale, character and the mix of uses and should not harm residential amenity, the environment or result in adverse transport impacts. The hours of operation will need to balance the needs of service providers and users of the premises against impacts on neighbouring residents. Opportunities should be considered for providing new faith and leisure facilities (e.g. sports halls) within major development schemes, particularly within Opportunity Areas and Intensification Areas.
- 4.50 Some uses, in particular serviced offices, hotels and educational premises, can be suitable for occasional use by a range of local community groups. Where a community, cultural or leisure facility has been redeveloped to provide any of the above uses, the resulting development will be expected to allow community groups to access rooms or facilities at a discounted rate.

Assets of Community Value

- 4.51 Community groups can nominate buildings and land as “Assets of Community Value” (ACV). The Localism Act defines an ACV to be an actual current use of a building or other land that is not an ancillary use and which furthers the social well-being or social interests of the local community. The Council will formally register the asset if it meets certain criteria. If it does, if and when the owner decides to sell the asset, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase it. The Council, when determining planning applications involving loss of community facilities, will have regard to any Assets of Community Value designation.

Public houses

- 4.52 Public houses (pubs) play an important role in the community. As places where members of the community meet, they support social well-being and strengthen community cohesion. They sometimes provide important community meeting space and host local meetings, events and entertainment. Some pubs also support Camden's social diversity by providing a valuable support function for minority groups. In some areas, the community pub continues to provide the main public space for socialising with friends, exchanging ideas, celebrating important occasions and staging large gatherings including live music, theatre and comedy nights.
- 4.53 Many pubs are central to local culture and heritage, the evolution of neighbourhoods and add to local identity and distinctiveness. Many of Camden's pubs are architecturally distinguished, located within Conservation Areas or benefit from protection through national listing or inclusion on Camden's Local List.



- 4.54 Pubs also have an important economic function in contributing to the vibrancy and vitality of commercial areas, supporting active street frontages and neighbourhood centres. Many pubs are a draw for tourists attracted by their iconic status in British culture. They support local employment, provide valuable work experience for young people and support jobs in the wider economy through the pub supply chain.
- 4.55 However, pubs across London and nationally are under immense pressure from higher value uses, especially housing development, the availability of cheap alcohol in supermarkets and increasing operating costs. In the London region between 2008-2012 around 100 pubs closed every year (net). Rising house prices sustains this pressure, although some pubs have been lost through permitted development rights to other Class A uses such a retail. There is a very uneven distribution of pubs in Camden. Holborn and Covent Garden has the highest number of pubs due to being located where there are considerable numbers of visitors and tourists. Camden Town is also a focus for pubs linked to the vibrant music scene and its popularity as a destination for young people. Across the Central Activities Zone, there is a mix of provision with pubs serving local communities and office trade. In some areas, there are high concentrations

of pubs. There are far fewer pubs in the majority of wards north of Euston Road and some of these pubs are the last remaining in the local community.

4.56 National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way.

4.57 This policy is intended to give the Council greater control over the demolition and conversion of pubs where a planning application is required. This will help prevent the loss of pubs to uses which offer little or no community value. We are also reviewing our approach to permitted development rights affecting pubs. These allow the change of use of a pub (Use Class A4) to certain other uses, including restaurants and shops.

Policy C3 Public houses

The Council will seek to protect public houses of social, economic, cultural and historic value to the local community and the borough.

Applications for the change of use, redevelopment and/or demolition of a public house must demonstrate to the Council's satisfaction that:

- a. the proposal does not result in a deficit of provision in the local area;
- b. the facility is no longer economically viable;
- c. a marketing exercise has been undertaken in order to confirm that there is no interest in the continued use of the property or site as a public house.

We may not seek to apply these tests in areas with a recognised over concentration of pubs, including Special Policy Areas for licensing.

Where a public house is converted to an alternative use, the historic fabric and features should be retained wherever possible.

Applications for the change of use of the facilities ancillary to the operation of the public house will be permitted where the loss of the ancillary use will not adversely affect the operation of the public house.

Where change of use is justified the Council's preferred alternative use will be housing (C3).

We will support the provision of new public houses in appropriate sites in growth areas, other highly accessible locations and town centres, subject to other policies in the Plan.

4.58 Policy C3 seeks to provide protection to public houses that are important for their social, economic, cultural and historic value while ensuring that redevelopment or change of use is possible where this is not the case. This reflects paragraph 70 of the NPPF which urges Local Planning authorities to plan positively for the provision and use of public houses and guard against the unnecessary loss of valued facilities. The policy allows flexibility by supporting development where it would not be contrary to the interests of the economy or community. The overall aim is to ensure that the Council is able to protect all of its public houses which provide a significant benefit or value to the local community, including access to a

range of facilities; that public houses of historic and cultural value are conserved and enhanced according to their significance and that the vibrancy and vitality of our centres and local economies are sustained.

- 4.59 In recognition of the important role public houses play, the Council will expect the criteria in the policy to be met in order to justify a change of use or redevelopment.
- 4.60 Pubs embody many generations of local culture and history. As already stated, the provision of pubs varies significantly across Camden. There are parts of the borough where there is a negative cumulative impact from a particularly high concentration of licensed premises leading the Council to designate 'Special Policy Areas' using its licensing controls (Camden Town and Seven Dials). The designation of these areas is intended to avoid further negative impact. The Council will take into account evidence of where there is an overconcentration of pubs in determining whether to request a marketing and viability assessment.
- 4.61 The intention of this policy is to sustain a balanced, vibrant and diverse evening economy in Camden of which public houses form a vital part, giving particular attention to the retention of 'community pubs'. A 'community pub' predominantly serves a local residential community and is a unique community amenity providing space for social interaction. Outside the Central Activities Zone, there is far less opportunity to access a pub within walking distance. Ultimately, the particular role and value of a public house has to be determined on a case by case basis.
- 4.62 It is important that the local community have a say in whether these facilities should be maintained. We may require the applicant to fund a survey of local residents and businesses to establish the community's views on the loss of the public house prior to the submission of a planning application. The methodology and content of the survey would need to be agreed in writing by the Council and be funded by the applicant. This should be supported by evidence setting out the alternative public house provision in the local area/community including the location, size, range and quality of facilities and taking account of any unimplemented planning permissions relating to the addition and/or loss of public houses. In assessing a reasonable level of accessibility for alternative provision, the Council will use a benchmark of 800 metres or a 10 minute walking distance.



- 4.63 Applicants should demonstrate that it would not be economically viable to retain the public house in its existing use. We will require at least three trading years of audited accounts and evidence of the efforts made to preserve the public house, improve its profitability and attract new customers, including the introduction of complementary functions and diversification options. This should include consideration of whether a different business model and/or a different owner/operator might result in the public house becoming economically viable. Any changes to the pub that may have affected its trading performance should also be identified (e.g. refurbishments, changes to opening hours). Written statements by staff and customers and provision of invoices must be supplied as evidence of any physical or operational changes.
- 4.64 A marketing exercise should be undertaken to show that all reasonable attempts have been made to retain the public house in its existing use. This must be undertaken for a period of not less than 12 months at a realistic price which should be pre-agreed in writing by the Council following independent valuation (by a professional RICS valuer with expertise in the licensed leisure sector) at the applicant's expense. Both freehold and leasehold options should be made available without a 'tie' requiring the purchase of drinks through the vendor and without restrictive covenants preventing other pub operators, breweries, local businesses or community groups from taking over the pub. The range of marketing methods should be agreed in advance with the Council.
- 4.65 Many pubs are valued for their historic fabric and contribution to the character of the area including their distinctive windows, signage and fittings. Many pubs include historic fabric and features which are important to the character of the local area. Where the conversion of a public house is considered acceptable, we wish to see these historic features maintained. Some of Camden's pubs are listed buildings and are therefore afforded protection under the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 4.66 Outdoor amenity spaces, gardens and parking areas attached to pubs can also be subject to similar pressures for residential development. Proposals may also involve the part conversion of a pub leading to the loss of function rooms or trading space. The loss or change of use of these areas will not be permitted where it is considered that this may prejudice the economic viability or future operation of the public house. The Council may seek appropriate independent advice on this matter which would need to be funded at the applicant's expense.
- 4.67 Subject to the impact of the development on nearby residential uses and amenity and policies in the Plan seeking to protect the function and character of centres, the Council will support the provision of new public houses where this positively enhances the range of community facilities serving growth areas, highly accessible locations and town centres identified by this Plan and on other major sites where appropriate. Pubs can potentially play a crucial social role in promoting community interaction and activities in these areas, helping to build and maintain sustainable neighbourhoods.
- 4.68 As stated in paragraph 4.51 above, community groups can nominate buildings and land, including pubs, as "Assets of Community Value". If and when the owner decides to sell an asset of community value, a local group can trigger a six month moratorium on the sale giving them time to raise the funds to purchase it. The Council, when determining planning applications involving the loss of pubs, will have regard to any Assets of Community Value designation.

Safety and security

- 4.69 Crime and fear of crime is a significant concern for many Camden residents and businesses, and can undermine people's quality of life, health and well-being. Ensuring Camden is a safe place for everyone forms a key part in meeting the objectives of the Camden Plan.
- 4.70 Our challenge is to make Camden a safer place for local residents and those who work in and visit the borough, while making sure that it maintains the vibrancy that contributes so much to its character and success. The following policy will help us make Camden a safer place.

Policy C4 Safety and security

The Council will aim to make Camden a safer place.

To achieve this we will:

- a. work with our partners to tackle crime, fear of crime and antisocial behaviour;
- b. require appropriate security and community safety measures in buildings, spaces and the transport system;
- c. require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;
- d. ensure Camden's businesses and organisations take responsibility for reducing the opportunities for crime through effective management and design;
- e. promote safer streets and public areas;
- f. address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres; and
- g. promote the use of active frontages and permeable spaces as a means of reducing crime.

Where a significant potential vulnerability to terrorism has been identified, the Council will expect counter-terrorism measures to be incorporated into the design of buildings and associated public areas.

- 4.71 The level and type of crime and antisocial behaviour varies across the borough and areas of higher crime have been identified within Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury wards. The borough's central location and thriving night time economy can be linked to a range of problems including alcohol and drug related criminal and antisocial activity. Development in the borough provides the opportunity to implement measures to improve community safety, in particular where development takes place in areas with relatively high levels of crime and antisocial behaviour.
- 4.72 The Camden Community Safety Partnership is a statutory body established to reduce crime, disorder and nuisance in the borough. The Partnership is a network of organisations involved in community safety including the Council, Metropolitan Police, Transport Police, the Mayor's Office for Policing and Crime (MOPAC), and the Camden Safer Neighbourhood Board. Every year the partnership sets

priorities based on safeguarding of risk and harm and mitigating against the impact of crime and antisocial behaviour.

- 4.73 Consideration of how crime, disorder and fear of crime can be addressed is an important element in good design. This can create safe and attractive places to live and work, reduce the opportunity for crime and allow for better maintenance and management of buildings and spaces. The Council will require all developments to incorporate appropriate design, layout and access measures to help reduce opportunities for crime, the fear of crime and to create a more safe and secure environment. Crime Impact Assessments will also be sought for larger schemes.
- 4.74 These features should be incorporated into a scheme from the beginning of the design process; however, they should complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in Camden Planning Guidance 1: Design supplementary document supplementary document.
- 4.75 The design of streets, public areas, and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage antisocial behaviour. The use of the site and layout should be carefully considered as these can also have a major impact on community safety.
- 4.76 Camden's food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be considered.
- 4.77 Alcohol related crime and late night disorder have been identified as significant issues, particularly in Camden Town and the Seven Dials area of Central London. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and special licensing policies apply to these areas. The Council will also use management and maintenance plans with owners and operators, secured by legal agreement, to make sure that the areas outside of premises used in the evening economy are appropriately managed. Further information is available in Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document.
- 4.78 Pedestrian use has the effect of reducing the opportunities for crime as it increases the perception that a potential crime will be seen. To encourage pedestrian use, the Council aims to ensure spaces are permeable (i.e. easy to walk through). Developments should also maximise the use of 'active frontages' designed to give buildings a safer, more welcoming appearance, particularly at street level. Encouraging pedestrian use will naturally deter crime by 'natural surveillance' (i.e. the more people there are in a particular place, the more likely a crime will be spotted and reported). Further information is available in policy D1 – Design, policy D3 – Shop fronts and Camden Planning Guidance 1: Design supplementary document supplementary document.
- 4.79 Camden's position in the centre of a major international city, its high profile, major transport interchanges and famous buildings and places make security an important issue in the borough. The Council will pay extra care and attention

to sites identified at the pre-application stage as vulnerable to terrorist attack. The design of these buildings, spaces and transport facilities will be expected to include appropriate and proportionate security and community safety measures and follow design principles contained within the government publication Protecting Crowded Places: Design and Technical Issues (2012).

Access for all

- 4.80 Good access and inclusion benefits everyone. However, many people are disadvantaged by poor access to facilities and buildings and many vulnerable and disadvantaged groups, such as disabled people, older people and others who experience a barrier to the built environment, can be particularly affected. Poor access can also be caused by difficulties in using the specific facilities themselves.

Policy C5 Access for all

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design;
 - b. require buildings and spaces to be designed to be inclusive and fully accessible so they can be used safely, easily and with dignity by all;
 - c. expect facilities to be located in the most accessible parts of the borough;
 - d. expect spaces, routes and facilities between buildings to be designed to be fully accessible;
 - e. encourage accessible public transport;
 - f. secure car parking for disabled people; and
 - g. expect dwellings to be designed to be accessible.
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- 4.81 Many people experience difficulties in using buildings and spaces as their access needs are ignored, or considered too late in the development process to ensure inclusive design principals are included.
- 4.82 The Council will require all buildings and spaces to be designed to be fully accessible and promote equality of opportunity. As accessibility is influenced by perceptions as well as physical factors, buildings should also be designed to appear, as well as be, accessible. We will require a Design and Access Statement for new developments and spaces to show how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.
- 4.83 The Council will balance the requirement to provide access with the interests of conservation and preservation. We will seek sensitive design solutions to achieve access for all to, and within listed buildings. Policy D2 - Heritage and Conservation sets out our detailed approach to development affecting listed buildings.
- 4.84 Making sure that people can move through streets and places, easily and safely is as important as making the buildings themselves accessible. The Council will expect improvements for all pedestrians including disabled people to ensure good quality access and circulation arrangements, including improvements to existing routes, surfaces and footways. The Camden Streetscape Design Manual and our Camden Planning Guidance 1: Design supplementary document supplementary document provide further guidance on this issue.

- 4.85 The Council aims to increase the attractiveness of public transport by creating networks which make people feel safe, link to all parts of the borough and enable use by everyone including disabled people . The provision of public transport allows independence in travel choices and is vital to those without access to, or without the means to use, a car.
- 4.86 While the Council encourages public transport and car-free schemes, in line with sustainable development objectives, we recognise that some disabled people rely on private motorised transport. We will therefore require relevant planning applications to demonstrate how the needs of disabled drivers have been addressed. We will also welcome disabled parking and drop-off facilities which are integrated with public transport facilities.
- 4.87 The Council believes that new housing should allow less mobile residents to live as independently as possible. Accessible homes give them greater choice about where to live and mean people are less likely to need to move when they become less mobile. The Council will therefore require housing to meet the Lifetime Homes standards, which are designed to meet the differing requirements created by changing life circumstances. In addition we require housing to be fully accessible or easily adaptable for wheelchair users. Detail on the Council's approach to Lifetime Homes and wheelchair housing is set out in Camden Planning Guidance 2: Housing supplementary document.

5. Economy and jobs

Promoting a successful and inclusive Camden economy

- 5.1 Camden has one of the most successful economies in the country: home to 24,000 businesses and over 300,000 jobs. The success of our economy relies on the wide variety of employment sectors including professional and business services, the 'knowledge economy', for example higher education and research, and creative industries such as design, fashion and publishing. Camden also has a large number of jobs in the health sector, hotels and restaurants, legal services and transport and distribution. We want to maintain and build on this success by encouraging investment that supports business growth creating further job opportunities for Camden residents and developing the infrastructure that will help existing businesses to thrive.
- 5.2 The majority of jobs in the borough are located south of Euston Road, in Camden Town and in the town centres to the north of the borough. Camden also attracts mid- and small-scale creative organisations. These often cluster together in tailored buildings, for example Cockpit Arts and Kingsgate Workshops, or in certain parts of the borough, such as the wider King's Cross area, which contains over 300 small cultural and creative industries, and Camden Town, with its concentration of design and media firms. Camden's shops also have a significant role as local employers as well as being valuable community facilities.
- 5.3 Thousands of people travel into the borough every day to work to take advantages of these opportunities. However, a number of local residents do not have the skills or qualifications sought by the borough's employers, particularly in 'knowledge-based' business. We want residents to benefit from the employment opportunities created by Camden's economic success by linking the efforts of the Council, schools and employers to provide local people with the skills needed to gain employment. We will also work with partners to reduce inequality through training and apprenticeship schemes and affordable space for small and medium enterprises (SMEs) managed by businesses, higher education institutions and the third sector.
- 5.4 This policy will be a key element in achieving the vision and objectives of the Camden Plan and this Local Plan by providing for the jobs and training opportunities needed to support Camden's growing population and by securing land and premises for the borough's businesses. This will contribute to achieving the Camden Plan aspiration of making Camden a better borough, where everyone has a chance to succeed and nobody gets left behind by creating the conditions for and harnessing the benefits of growth.
- 5.5 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); and
 - other unclassified uses of similar nature to those above, such as depots or live/work (classed as sui generis).

Policy E1 Promoting a successful and inclusive Camden economy

The Council will secure a strong economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

We will:

- a. support businesses of all sizes in particular start-ups, small and medium-sized enterprises;
- b. maintain a stock of premises that is suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
- c. support local enterprise development, employment and training schemes for Camden residents;
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;
- e. support the development of Camden's health and education sectors and promote the development of the knowledge quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;
- f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000 sqm of office floorspace between 2014 and 2031;
- g. support Camden's industries by:
 - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
 - ii. considering proposals for the intensification and/or redevelopment of employment sites and premises if the proposals can provide significant additional employment and other benefits in line with policy E2 - Employment premises and sites below;
 - iii. promoting and protecting the jewellery industry in Hatton Garden;
- h. expect the provision of high speed digital infrastructure in all employment developments; and
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.

Providing a range of employment premises

5.6 In order to secure a strong and successful economy the Council will support businesses of all sizes, particularly start-ups, small and medium-sized enterprises. Smaller businesses alongside larger businesses make a significant contribution to the local and wider economy.

5.7 Camden has a large proportion of small businesses, with 83% employing less than nine people and further 14% employing between 10 and 49 employees. However, the premises suitable for small businesses as well as the medium-sized enterprises are currently under pressure from rising land values, limited land and the recently introduced 'permitted development' rights which allow the change of use from office use class (B1(a)) to housing (C3) without the need for planning permission and which therefore are not assessed against our planning policies.

- 5.8 The majority of our office stock is in Central London, particularly in the area between the City and the West End, which is characterised by a high number of small to medium sized, multi-let buildings, with a smaller number of large, single occupier buildings. However, most of the secondary local office provision is located in Camden Town, Kentish Town and Kilburn. These locations also provide a substantial amount of workshop space, which supports the needs of digital technology, communication, media and consultancy businesses.



- 5.9 The permitted development rights currently apply to the whole borough except Camden's part of the Central Activities Zone (CAZ), for which the Council secured an exemption. Current evidence shows that the demand to convert office premises to residential has been particularly high in Kentish Town, Camden Town with Primrose Hill and Kilburn where there are significant concentrations of premises suitable for start-up, small and medium-sized enterprises. This demand is linked to rising residential values which are making these types of conversions attractive development propositions. There is therefore an increasing risk that the growth sectors, in particular creative industries, as well as small and medium-sized enterprises, will find it difficult to find suitable premises in order to locate and grow in Camden. Therefore, we will continue to use the measures available to us to protect such premises in the borough and ensure that new proposals do not result in a net loss of premises suitable for such uses.
- 5.10 Small businesses are often seeking premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and networking space to interact with other small business or meet with clients. Therefore, as well as safeguarding existing employment sites, we will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including: flexible occupancy terms, flexible layouts, studios, workshops, networking, socialising and meeting space that will meet the needs of a range of business types and sizes.

- 5.11 We will also seek the provision of managed workspace or premises where this can be incorporated into developments with an employment component. This will help small and growing businesses and social enterprises in Camden to find suitable and affordable premises in buildings which are managed by a third party. Some workspace providers also supply administration and business services as well as a café/bar or other social space. Developers will be expected to liaise with the Council and managed workspace providers to ensure that appropriate accommodation is provided. Please see Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document for more information on the provision of flexible and affordable workspace.
- 5.12 The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high speed broadband, to be provided in employment premises.

Supporting local employment training schemes and enterprise development

- 5.13 There is often a mismatch in the skills needed by the borough's employers and the skills of many members of the community. Improving access to training will increase employment opportunities for Camden residents by giving them the skills needed to fill jobs both locally and further afield. The Council will promote the use of services like the King's Cross Recruit, Job Centre Plus and Camden Apprenticeship's job brokerage service, to employers and/or developers to ensure developments employ a proportion of local people.
- 5.14 To ensure that local residents benefit from the employment opportunities, we will require suitable developments to provide training and employment opportunities on-site. The King's Cross construction training centre will provide a key point of contact to assist developments delivering benefits to local residents.
- 5.15 Large schemes which have significant job creation potential will be expected required to produce an Employment and Training Strategy to cover how the employment and training requirements of the Section 106 will be addressed and supported. This will be agreed by the Council and secured via a Section 106 agreement. More information on our approach to Employment and Training Strategies is provided in the Camden Planning Guidance 5 – Town Centres and Employment Uses.
- 5.16 We aim to make Camden the best place to do business in London. To help us achieve this goal, we have produced the Camden Business Charter which sets out the Council's commitment to business across the following five key priority areas:
- attracting investment into Camden;
 - providing services for you as a business customer;
 - connecting your business to the local community;
 - investing in business infrastructure; and
 - supporting SMEs and social enterprises.
- 5.17 The Charter will help us to support Camden's 26,000 existing businesses and the many new arrivals joining our ranks through major developments such as King's Cross Central. The Charter also links to our wider aim of creating the conditions

for and harnessing the benefits of economic growth as outlined in the Camden Plan.

5.18 The Charter is a working document which will be updated on an annual basis.

5.19 The Council recognises the importance of targeted private sector partnerships and their role in supporting Camden's growth. The Council will work with local business groups and partnerships, including:

- Camden Town Unlimited (BID);
- Inmidtown (BID);
- The Fitzrovia Partnership (BID);
- Midtown Business Club;
- Islington Chamber of Commerce / Camden Business Network;
- King's Cross and St Pancras Business Partnership;
- Federation of Small Businesses; and
- Hatton Garden Jewellery Quarter.

Growth Sectors

5.20 Camden is experiencing significant change with substantial population growth and increases in demand for housing and employment. The latest estimates show that the total number of jobs in Camden could increase from 318,000 in 2011 to 375,000 by 2031. The Council's overall objective is to create the conditions for growth, to provide the needed homes, jobs and other facilities, while ensuring that this growth delivers opportunities and benefits for our residents and businesses.

5.21 There are a number of growth sectors which are attracted to Camden in greater numbers. The Council will promote these sectors recognising the contributions they make to the Camden economy and beyond.

Professional and business administration

5.22 The industries that account for most of the jobs in this sector include legal, accountancy and management consultant industries as well as engineering, smaller financial services and insurance sector. Administration and business support services also account for more than 40,000 jobs and include employment placement agencies as well as jobs in servicing building and landscape activities, real estate and office administration support.

Creative industries

5.23 Camden is home to a large proportion of creative and cultural businesses, particularly in the visual and performing arts, music, and video, film and photography sectors. The Creative and Cultural Industries Research Report and Action Plan 2009 found that these types of businesses create around 40,000 jobs and have an annual gross turnover of about £1 billion in Camden. The report also identifies concentrations of creative and cultural businesses across the borough, with the largest in Camden Town and smaller concentrations in and around King's Cross, Euston, Gospel Oak and Hatton Garden.

5.24 Camden Town has one of the largest concentrations of creative businesses in Inner London with over 500 creative workplaces and around 5,000 employees. Creative businesses are attracted to the area because of its value for money, with

rents lower than in locations such as Soho and Shoreditch, and also because of Camden Town's unique character, which attracts a young and creative workforce.

- 5.25 The Council recognises the importance of creative industries, especially the contribution they make to the unique character and vitality of the borough. We have a number of initiatives to develop and support the creative economy in Camden, including funding for a wide range of agencies which help to promote the sector. We will continue to encourage and support the growth of this sector by promoting the provision of a range of premises via policy E2 particularly for businesses that require more flexible workspaces.

Knowledge quarter

- 5.26 Camden has a thriving knowledge economy with world-class institutions in science and creative industries. The Knowledge Quarter partnership was established in December 2014 to recognise and develop this strength. The partnership is made up of 35 academic, cultural, research, scientific and media organisations all within a mile radius of King's Cross. It's overall vision is for a world-class knowledge hub for the 21st century, raising awareness and leveraged support for innovation, collaboration and knowledge exchange. Among the Knowledge Quarter's members are Central Saint Martins College, the University of London, UCL, the Wellcome Trust, the Royal College of Physicians, the British Library, The British Museum and Google, who will be building their new UK headquarters at King's Cross.



New office floorspace

- 5.27 The high concentration of property, banking and service activities and large number of publishing and media businesses in the borough mean that over a significant number of Camden's jobs are in offices.

- 5.28 The Camden Employment Land Review 2014 forecasts that the demand for offices will increase by 695,000 sqm between 2014 and 2031. To meet this demand, the Council will direct new office development to the growth areas, Central London, and the town centres (also see the policy G1 on Location and Delivering growth in Camden).
- 5.29 The majority of demand will be met at King's Cross, through the implementation of 444,000 sqm of permitted office space in King's Cross Central. There are current plans for further large-scale office development in Euston, where the Council envisages in the region of 180,000 to 280,000 square metres of business floorspace being provided in the second half the Plan period.
- 5.30 Smaller scale office development will also occur at other sites across Central London, with some provision in Camden Town. The Council's expectations for major development sites in the borough are set out in our Site Allocations document and the Fitzrovia Area Action Plan.
- 5.31 The Camden Employment Land Review 2014 identifies the town centres of Swiss Cottage, Kilburn and Kentish Town as having an important role for businesses that provide local services. Although these areas are not expected to experience an increase in demand for office space, we will seek to protect existing offices in these locations subject to the criteria set out in this policy.

Industrial and light-industrial premises

- 5.32 Camden has one of the lowest stocks of industrial and warehousing space among London boroughs. Our stock includes a few modern, purpose-built premises, a large number of older purpose-built units, railway arches, mews and converted residential spaces. These are spread across the borough with a number of concentrations in areas such as Kentish Town, West Hampstead, Kilburn and Gospel Oak. The Camden Employment Study 2014 found that the cost of industrial locations in Camden is high, indicating that supply does not meet demand. However, there has been pressure to redevelop the borough's stock of land used for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once employment land in the borough has been developed for an alternative use it is unlikely that it will be returned to industrial use.
- 5.33 Camden has strong trading links with London's Central Activities Zone (CAZ) and the borough's industrial and warehousing businesses provide it with a range of vital goods and support services. To make sure Camden's new and existing businesses support, and benefit from, the Central London economy, we need to ensure that sites and premises of adequate quality are provided.
- 5.34 Premises suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at relatively high risk of being unemployed or workless. The Camden Employment Study 20088 found that the skills required for these sectors are fundamentally different from other sectors with similar qualification level requirements, such as retail, leisure and hospitality. Therefore, it is unlikely that the retail or hospitality sectors will provide a straightforward alternative job opportunity for people losing industrial/warehousing jobs in the borough.

5.35 In response to the factors above, the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use unless the proposals can provide additional employment benefits in terms of the number and types of jobs and training for local people alongside other Council priorities. This approach will help to protect the supply of premises for new and expanding businesses, support the Central London economy and secure job opportunities for local people. The Council will expect training and job opportunities to be prioritised for those who would lose their jobs as a result of the proposals.

5.36 The Council's approach to industrial land is consistent with the London Plan and the Mayor of London's Land For Industry and Transport Supplementary Planning Guidance, which recognises the limited amount of industrial land relative to demand in Camden and so includes the borough in the "Restricted Transfer" category where boroughs are encouraged to adopt a more restrictive approach to the change of industrial sites to other uses. Policy E2 - Employment premises and sites below sets out the Council's approach to applications involving employment land in the borough.

Hatton Garden

5.37 Hatton Garden has been an established centre for the jewellery industry since the 19th Century and today the area is home to nearly 500 businesses and over 50 shops related to the industry. The 2009 Study Supporting Hatton Garden; Priorities for Investment examined the progress in strengthening the jewellery sector in the area. In order to promote Hatton Garden as a location for jewellery-related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses, E.G. Langdales Building in Cross Street and Arundel House in Kirby Street, secured through Section 106. Please see policy E2 – Employment sites and premises for our detailed approach.

Other employment generating uses

5.38 The Council recognises that jobs are provided by many types of uses within the borough, not just those based in offices or industrial premises. These include shops and markets, hotels and restaurants, leisure and tourism uses, as well as knowledge-based sectors such as health and education. For example Camden's visitor economy provides around 16,500 jobs in Camden, 10% of all tourism related employment in Inner London (Study of the Visitor Economy in Camden 2009) and is worth £566 million per annum. Other policies in this plan support these uses, in particular policy C2 - Community facilities and leisure, policy E3 - Tourism and policies TC1 - TC6 on town centres and shops.

Employment premises and sites

- 5.39 Policy E2 provides further guidance on the Council's approach to maintaining and securing a range of premises for businesses to support Camden's economy and provide employment opportunities for the borough's residents.

Policy E2 Employment premises and sites

The Council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses and those businesses and services that provide employment for Camden residents and supply local and Central London businesses.

We will resist development of business premises and sites for a non-business use unless it is demonstrated to the Council's satisfaction:

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

In Hatton Garden, where the applicant can demonstrate a) and b) above we will expect any proposals to provide mix of uses that include premises suitable for use as jewellery workshops.

We will consider redevelopment of the premises or sites that are suitable for continued business provided that:

- c. the level of employment floorspace is increased or at least maintained;
- d. the proposed premises are suitable for the continued use of the existing businesses or they are suitable for start-ups, small and medium enterprises, such as managed affordable workspace;
- e. in Hatton Garden, the proposed employment floorspace is suitable for jewellery workshops;
- f. the scheme would increase employment opportunities for local residents, including training and apprenticeships; and
- g. they include other priority uses, such as housing, affordable housing and open space, where relevant.

An element of workspace suitable for SMEs will be expected in any other major, employment-led developments.

Where proposals in Hatton Garden would increase total gross floorspace by more than 200 sqm, we will seek to negotiate up to 50% of the additional floorspace as affordable premises suitable for the jewellery sector.

The Council will safeguard the borough's main Industry Area for continued industrial uses. We will consider proposals for the comprehensive redevelopment of the Area where this meets the economic and employment objectives set out in c), d), f) and g) above. Development that would prejudice the nature or future operation of the Area by introducing inappropriate or conflicting uses will be resisted.

Business and employment uses

- 5.40 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 successful 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.
- 5.41 When assessing proposals that involve the loss of a business use to a non-business use we will consider whether there is potential for that use to continue. We will take into account various factors including:
- the suitability of the location for continued use;
 - the condition of the premises for continued use;
 - the range of unit sizes it provides, particularly suitability for small businesses; and
 - the impact of the nearby uses on the proposed non-business use.
- 5.42 For further details on how we will take these into account can be found in the Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document.



- 5.43 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.
- 5.44 Where premises or sites are suitable for continued business use, the Council will consider redevelopment schemes which maintain or, preferably, increase the amount employment floorspace and number of jobs and provide other priority uses, such as housing (and, in particular, affordable housing), community facilities and open space. The reprovided employment floorspace should be able to accommodate a range of business types and sizes, in particular small and medium sized enterprises (SMEs) and businesses in growth sectors such as the creative industries. The provision of affordable workspaces will be particularly welcomed.

- 5.45 Applicants must demonstrate to the Council's satisfaction that the commercial element of any redevelopment scheme 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. Further information on new workspace can be found in Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document.
- 5.46 Where it is proposed to redevelop employment land for another business use, the Council will seek to retain 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.

Industry Area

- 5.47 The Council will retain the Industry Area for industrial and warehousing uses by resisting any proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature unless comprehensive redevelopment proposals are brought forward that demonstrate that they comply with criteria c) - g) above and fully take into account, and are compatible with, the development of the adjacent Regis Road area (see policy G1 - Delivery and location of growth). Other development proposals that would prejudice the nature of the Industry Area by introducing inappropriate or conflicting uses, such as housing, will be resisted.

Hatton Garden

- 5.48 The designated Hatton Garden area has a special character due to its nationally and internationally important cluster of jewellery manufacture and trading. The Council seeks to preserve and enhance the special character of the Hatton Garden, and to secure and protect a stock of premises available for small jewellery workshops and related light industry.
- 5.49 In line with the policy, in the Hatton Garden area, the conversion of employment premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least two years and they are replaced by a mixed use development that includes premises suitable for use as jewellery workshops as well as other appropriate uses.
- 5.50 The Council will expect the marketing evidence to clearly demonstrate that these premises have been marketed explicitly for the jewellery industry through appropriate mediums. Applicants should contact the Council's Economic Development team, who can provide information and guidance on how this could be achieved.
- 5.51 We will use planning obligations and conditions to ensure that the premises are suitable for jewellery uses in terms of design, layout and affordability.
- 5.52 Where proposals would increase total gross floorspace by more than 200 sqm, we will seek to negotiate up to 50% of additional floorspace as affordable premises suitable for the jewellery sector. 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

- 5.53 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 the loss of permanent housing.

Tourism

- 5.54 Local Plan policy E1 - Promoting a successful and inclusive Camden economy sets out the Council's overall strategy for Camden's economy. It recognises the contribution that tourism makes to the character of Camden and the way that is perceived by those living outside the borough, and also the substantial number of jobs it provides. This policy sets out our detailed approach to supporting tourism and providing accommodation for those visiting the borough.

Policy E3 Tourism

The Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation.

We will:

- a. expect new, large-scale tourism development and accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;
- b. allow smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage;
- c. consider tourism development outside of the areas listed above where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough;
- d. expect large-scale tourism development and visitor accommodation to provide training and employ Camden residents; and
- e. protect existing visitor accommodation in appropriate locations.

All tourism development and visitor accommodation must:

- f. be easily reached by public transport;
 - g. provide any necessary off-highway pickup and set down points for taxis and coaches;
 - h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
 - i. not lead to the loss of permanent residential accommodation.
-

Tourism in Camden

- 5.55 Camden has a wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town's markets and Covent Garden; music venues such as the Roundhouse, Camden Palace (Koko) and the Forum; Regent's Canal; and historic places, such as Hampstead and Bloomsbury. These attract high numbers of visitors throughout the year from London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole.
- 5.56 Camden also has the second largest number (17,580) of serviced rooms in London, after Westminster (GLA Working Paper 58, Understanding the demand for and supply of visitor accommodation in London to 2036, August 2013). Visitor

numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London. The London Plan sets a target of achieving 40,000 net additional hotel rooms by 2036 across London. The Working Paper also states that 37% of the expected increase in the number of rooms across Greater London will be met in Westminster, City of London and Camden. This policy aims to maintain and encourage a range of attractions and accommodation in the borough for Camden's visitors.



- 5.57 Visitor accommodation includes hotels, bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other short-stay accommodation that is intended for occupation for periods of less than 90 days. Please see policy H8 for more information on short stay accommodation for homeless people and other vulnerable people.

Future developments

- 5.58 The Council will guide tourism development that is likely to attract large numbers of people to Camden's Central London area, particularly the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road. For tourism developments in Fitzrovia please refer to the Fitzrovia Area Action Plan. Tourist attractions may also be acceptable in other parts of the borough if they have a local focus and a limited number of expected visitors. Examples of this type of attraction are the Freud Museum, near Finchley Road, and Keats' House in Hampstead.

Appropriate locations

- 5.59 We will protect existing visitor accommodation in appropriate locations. Central London, our growth areas and the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage are considered to

be appropriate locations. Other locations may also be appropriate where they are highly accessible by public transport and do not harm amenity, the environment or transport systems.

Parking

- 5.60 Visitor attractions and accommodation can generate significant vehicle movements, particularly by taxi and coach. Any new development should therefore include off-highway set down and pick-up points for any taxis and coach visits they are likely to attract. 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. Please see policy T2 - Car-free Development and limiting the availability of parking for further information.

Training and employment

- 5.61 Large-scale tourism attractions and visitor accommodation employ a large number of people. New developments will be encouraged to provide training and employ Camden residents in line with policy E1 - Promoting a successful and inclusive Camden economy.

6. Protecting amenity

Managing the impact of development

- 6.1 This plan seeks to create the conditions for growth and harness its benefits 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 G1). 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.
- 6.2 Development can have a huge effect upon the amenity, health and well-being of residents and must therefore be managed effectively. Policy A1 seeks to make sure that the impact of a development on occupiers and neighbours is fully considered.

Policy A1 Managing the impact of development

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

We will protect the amenity of Camden's residents and those working in and visiting the borough by:

- a. making sure that the impact of developments on their occupiers and neighbours is fully considered;
- b. seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; and
- c. requiring mitigation measures where necessary.

We will expect development proposals to consider:

- d. visual privacy, overlooking, overshadowing, outlook;
 - e. sunlight and daylight;
 - f. artificial lighting levels;
 - g. impact upon transport networks including the use of transport assessments, travel plans and servicing and delivery management plans;
 - h. the inclusion of appropriate attenuation measures such as Construction Management Plans;
 - i. noise and vibration levels;
 - j. odour, fumes and dust;
 - k. microclimate; and
 - l. contaminated land.
-

Protecting amenity

- 6.3 Camden's high level of amenity – the features of a place that contribute to its attractiveness and comfort – is a major factor in the quality of life of the borough's residents, workers and visitors and fundamental to Camden's attractiveness and success. However, Camden's Inner London location, the close proximity of various uses and the presence of major roads and railways can mean that privacy, noise and light can be particular issues in the borough.

6.4 Protecting amenity is, therefore, a key part of successfully managing growth in Camden and ensuring its benefits are properly harnessed. We will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts. Other policies in this plan also contribute to protecting amenity in by setting out our approach to specific issues, such as the impact of food, drink and entertainment uses (policy TC4), noise and vibration (policy A4) and air quality (policy CC4).

Visual privacy, overlooking, overshadowing, outlook.

6.5 A development's impact on visual privacy, overlooking, overshadowing, outlook, sense of enclosure 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.

Sunlight, daylight

6.6 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) 2011.

Artificial lighting levels

6.7 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. Artificial lighting should only illuminate the intended area and not affect or impact on its surroundings.

6.8 Schemes involving floodlighting and developments in sensitive areas, such as those adjacent to sites of nature conservation, 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 information please see Camden Planning Guidance 6: Amenity supplementary document.

Transport

6.9 We will resist development that fails to assess and address any need for movements to, from and within a site, including links to existing transport networks. Proposals should also make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, and to public transport networks.

6.10 The Council will consider information received within transport assessments, travel plans and delivery and servicing management plans to assess the impact the development will have upon the transport network. In instances where existing or committed capacity cannot meet the additional need generated by the development, 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.

- 6.11 Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes and avoid creating a shortfall to existing on-street parking conditions or amendments to Controlled Parking Zones.
- 6.12 Road user and pedestrian safety should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.
- 6.13 Highway works, connected to development proposals, will be undertaken by the Council at the developer's expense. This ensures that highway works, maintenance and materials pallet adopted by the Council are constructed to the appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development, will be secured through a Section 106 agreement with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces.

Attenuation measures and Construction Management Plans

- 6.14 Most potential negative effects of a development can be designed out or prevented through mitigation measures. We will require any attenuation measures to be identified prior to planning permission being granted and secured for the lifetime of the development.
- 6.15 Disturbance from development can 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.
- 6.16 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.
- 6.17 A Construction Management Plan will usually be secured via legal agreement between the developer and the Council after an application is approved. The Council may also seek financial contributions if necessary. Major developments and developments such as basements will however also be required to submit a draft construction management plan as part of a planning application. For further details on construction management plans please refer to Camden Planning Guidance 6: Amenity supplementary document.

Noise and vibration

- 6.18 Noise and vibration can have a major effect on amenity and health and therefore quality of life. The World Health Organisation (WHO) states that excessive noise can seriously harm human health, disturb sleep and cause cardiovascular and behavioural effects. Camden's high density and mixed-use nature means that disturbance from noise and vibration is a particularly important issue in the borough.
- 6.19 Where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. More detail can be found in policy A5 – Noise and Vibration and Camden Planning Guidance 6: Amenity supplementary document.

Odours, fumes and dust

- 6.20 Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition which have the potential to cause a range of health problems, including respiratory diseases.
- 6.21 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 6: Amenity supplementary document.
- 6.22 The Council will limit the disturbance from dust due to construction and demolition by expecting developers and their contractors to follow the Greater London Authority and London Councils' Best Practice 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.

Microclimate

- 6.23 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, where as 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. Further detail can be found in Camden Planning Guidance 6: Amenity supplementary document.

Contaminated Land

- 6.24 Development on contaminated land can expose local residents, workers and visitors to a wide range of potential health risks. The Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required.

- 6.25 For example, sites that have been used for vehicle repair, industrial processes and petrol stations could have land contamination issues. Remedial action is particularly important in developments where people will have access to the ground for gardening, play or planting food for consumption. Please refer to the Council's Contaminated Land team Camden Planning Guidance 6: Amenity supplementary document.

Provision and enhancement of open space

- 6.26 Camden benefits from a broad range of open spaces including parks, natural or semi-natural green spaces, small neighbourhood playgrounds, historic cemeteries, churchyards, allotments and other types of public and open space, including London Squares, the Regent's Canal and rooftop gardens. There are 293 open spaces and 188 housing estate amenity areas. Camden has 98 parks, representing around three-quarters of all open space, with over 70 managed by Camden Council. Camden also has 12 entries on the English Heritage Register of Parks and Gardens of Historic Interest. Taken together, our open spaces cover 588 hectares.
- 6.27 Open spaces serve to shape and support new and existing communities and provide sustenance for wildlife. They benefit economic development through increasing productivity and attracting business investment, contribute to the character and identity of the built environment and offer a sense of comfort, pleasure, continuity and belonging. They are a source of visual, cultural and historic amenity, contribute to managing stormwater run-off which reduces flooding and cool the air combating the tendency for buildings and hard surfaces to trap heat.
- 6.28 Over time, open spaces have needed to adapt to changing needs and priorities. 'Green infrastructure' has become increasingly influential in shaping the way open spaces and connecting 'corridors' are planned and managed. This involves seeking opportunities to build a robust network of green assets capable of performing multiple functions and delivering a better quality of life. In a constrained built-up area such as Camden, urban greening, such as green roofs and walls, will be an important means of responding to a changing climate.
- 6.29 The Mayor's All London Green Grid Supplementary Planning Guidance (SPG)10 sets out a green infrastructure strategy for the whole of London. It is underpinned by 'green grid' area frameworks with objectives and opportunities for eleven sub areas. The frameworks form a basis for the development and delivery of green infrastructure projects.
- 6.30 The link between open spaces and strategies to improve health and well-being are particularly important:
- Recorded numbers of obese and overweight people in Camden remain high¹¹. Increasing participation in physical exercise would help reduce premature death.
 - Camden's mental health needs are high compared to London and national benchmarks¹². Studies have shown that green space can boost levels of personal contentment and vitality. Parks provide a range of environments for relaxation and stress relief.
 - The borough is designated as an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂) and small particles (PM₁₀). Trees and vegetation can combat the effects of air pollution which raise the likelihood of asthma and life-threatening illness. They can store carbon, help cool the air during heatwaves and help prevent sunburn.

- Playgrounds and open space support child development and boost levels of workplace productivity. There are social and educational benefits from volunteering and community action, contributing to sustainable communities. Food growing on open spaces can provide access to low-cost healthy food.
- 6.31 Open space provision in Camden is dominated by two major open spaces – Hampstead Heath and Regent’s Park/Primrose Hill, which are managed by the City of London and The Royal Parks respectively (46% of all our open space is provided by Hampstead Heath alone). The Regent’s Canal is an iconic feature which bisects the borough supporting sustainable travel and biodiversity. These three spaces are described further below.
- 6.32 Open space provision is not evenly distributed across the borough. There is 2.7 hectares of open space per 1,000 population but this figure is skewed by Hampstead Heath. If the Heath is removed, provision falls to 1.4 hectares per 1,000 population. At ward level the provision of public open space ranges from 37.2 hectares in Highgate to less than 0.5 hectares per 1,000 population in Belsize, Canteloves, Haverstock, Kentish Town and Swiss Cottage. Generally, the areas with the lowest levels of provision are also those with higher housing densities and greater numbers of children.
- 6.33 We will need to ensure that existing public open spaces continue to be adequately protected and additional open space is secured in new development according to its size, nature and location. When the Council refers to public open space, it means spaces which are freely accessible to members of the public for at least five days a week.
- 6.34 The introduction of the Community Infrastructure Levy will potentially provide an additional funding stream for the Council to invest in enhancements to open spaces and green infrastructure. The aim of this policy is to raise the quality, quantity, range and accessibility of public open space in the borough.

Policy A2 Provision and enhancement of open space

The Council will protect, maintain and enhance Camden’s parks, open spaces, green corridors and green infrastructure.

We will:

- a. protect open spaces designated on the Proposals Map by ensuring that they are not built on unless:
 - i. an assessment has been undertaken to clearly demonstrate that the open space, buildings or land is surplus to requirements, or
 - ii. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location, or
 - iii. the development is for an alternative sport and recreation provision and the need for which outweighs the loss;
 - iv. resist development proposals adjacent or near to a public open space which would be detrimental to their quality and value;
- b. preserve and enhance Metropolitan Open Land (MOL), Hampstead Heath, Regent’s Canal and their setting; and
- c. work with external partners including land owners and land managers, Friends Groups and allotments associations to preserve and enhance parks and open spaces.

We will tackle deficiencies and meet increased demand for open space by:

- d. securing the provision of additional publicly accessible open space and its ongoing management according to the needs generated by a proposed development;
- e. Where the direct provision of new public open space is not feasible we will:
- f. secure improvements and enhanced maintenance to existing public open spaces;
- g. secure access to privately owned sites for the public;
- h. improve accessibility and enhance open spaces including green corridors, and;
- i. seek an appropriate mix of green infrastructure across the development to provide amenity space, biodiversity enhancements, mitigate and adapt to climate change.

We will also:

- j. seek contributions to children's play space and young people's recreation space where a need arises;
 - k. encourage and support the provision of community run and managed allotments and community gardens in major new developments where possible and appropriate;
 - l. seek opportunities to provide outdoor sports facilities within major development areas;
 - m. enable improvements to amenity open spaces on housing estates;
 - n. support communities in identifying local green spaces through neighbourhood planning.
-

Protection of our open spaces

- 6.35 It is important that we protect our existing parks and open spaces as Camden will experience further significant growth in its resident and working population over the Plan period. Parks and open spaces, together with green corridors and other green features, also form a vital means of mitigating and adapting to climate change.
- 6.36 The Council will protect the open spaces designated on the Proposals Map, as well as other suitable land with the potential to be used as open space. The loss of open space can result in the need for longer journeys for leisure and recreation, potentially limiting opportunities to the health benefits of open spaces and opportunities for the community to meet and participate in local life. The poor quality of an open space will generally not be accepted as a reason for its whole or partial development.
- 6.37 When assessing proposals that involve the loss of open space, the effects on physical and visual amenity and townscape character will be important considerations. If the loss of open space is unavoidable, the Council will expect appropriate provision to be made elsewhere. In assessing the suitability of alternative space, we will expect the applicant to demonstrate how this would impact on accessibility to open space. This assessment should use the accessibility standards set out in Camden Planning Guidance 6: Amenity supplementary document.

6.38 Open space facilities are periodically modernised or redeveloped to meet changing needs and demands. Where extensions and alterations to existing buildings are planned within an open space, these should be proportionate to the size and volume of the original building. If an existing leisure use is no longer required, alternative leisure should be thoroughly explored that would be suitable for the site.

6.39 Development adjacent or near to an open space can threaten its use or enjoyment. Harmful impacts may include noise, overshadowing leading to a loss of light or negative changes to its setting or backdrop. We will only allow proposals that respect the size, form and use of the open spaces shown on the Proposals Map; do not generate harm to the wholeness, appearance or setting, or restrict public enjoyment of the space. Where appropriate, we will take into account the cumulative impact of proposed developments.



Metropolitan Open Land (MOL) and the Regent's Canal

6.40 Camden's designated open spaces include Metropolitan Open Land. This is open space of London-wide significance that provides a break in the built up area and receives the same presumption against development as green belt land. The four main areas of Metropolitan Open Land in Camden are of great importance to the borough and its character: Hampstead Heath and adjoining areas; Regent's Park; Primrose Hill / Barrow Hill Reservoir; and Highgate Cemetery / Waterlow Park / Fairseat. These will be protected in accordance with London Policy 7.17. The Regent's Canal is Camden's only significant watercourse and forms part of the Blue Ribbon Network, London's strategic water network of waterspaces, which has its own set of policies in the London Plan (7.24 – 7.28 and 7.30).

Hampstead Heath

- 6.41 Camden's largest open space. The City of London, who own and manage the Heath, has developed a management plan in consultation with local interest groups and the wider community. We will work with the City, English Heritage and Natural England on preparing and implementing plans for the Heath.
- 6.42 Hampstead Heath and Kenwood is a Site of Metropolitan Importance for Nature Conservation, within which there is a Site of Special Scientific Interest of national significance – Hampstead Heath Woods. There are also numerous large gardens adjacent to the Heath that are designated open space.
- 6.43 Hampstead Heath has a crucial role to play in providing sports and recreation opportunities and promoting good health. The facilities include an athletics track, provision for football, cricket and bowls and a lido.
- 6.44 We will continue to use the guidance in the conservation area statements, appraisals and management strategies for Dartmouth Park and Mansfield, Hampstead, Highgate Village, Redington and Frognaal and South Hill Park to preserve and enhance the built environment around the Heath and preserve outlooks and views from it.
- 6.45 The Heath sits atop Hampstead ridge affording long southerly views over London. The view towards Central London from Parliament Hill and Kenwood is designated as a London Panorama in the London Plan for its strategic importance. There are Protected Vistas of St. Pauls' Cathedral from Parliament Hill and Kenwood and of the Palace of Westminster from Parliament Hill. The London View Management Framework Supplementary Planning Guidance explains how these views are protected and managed.

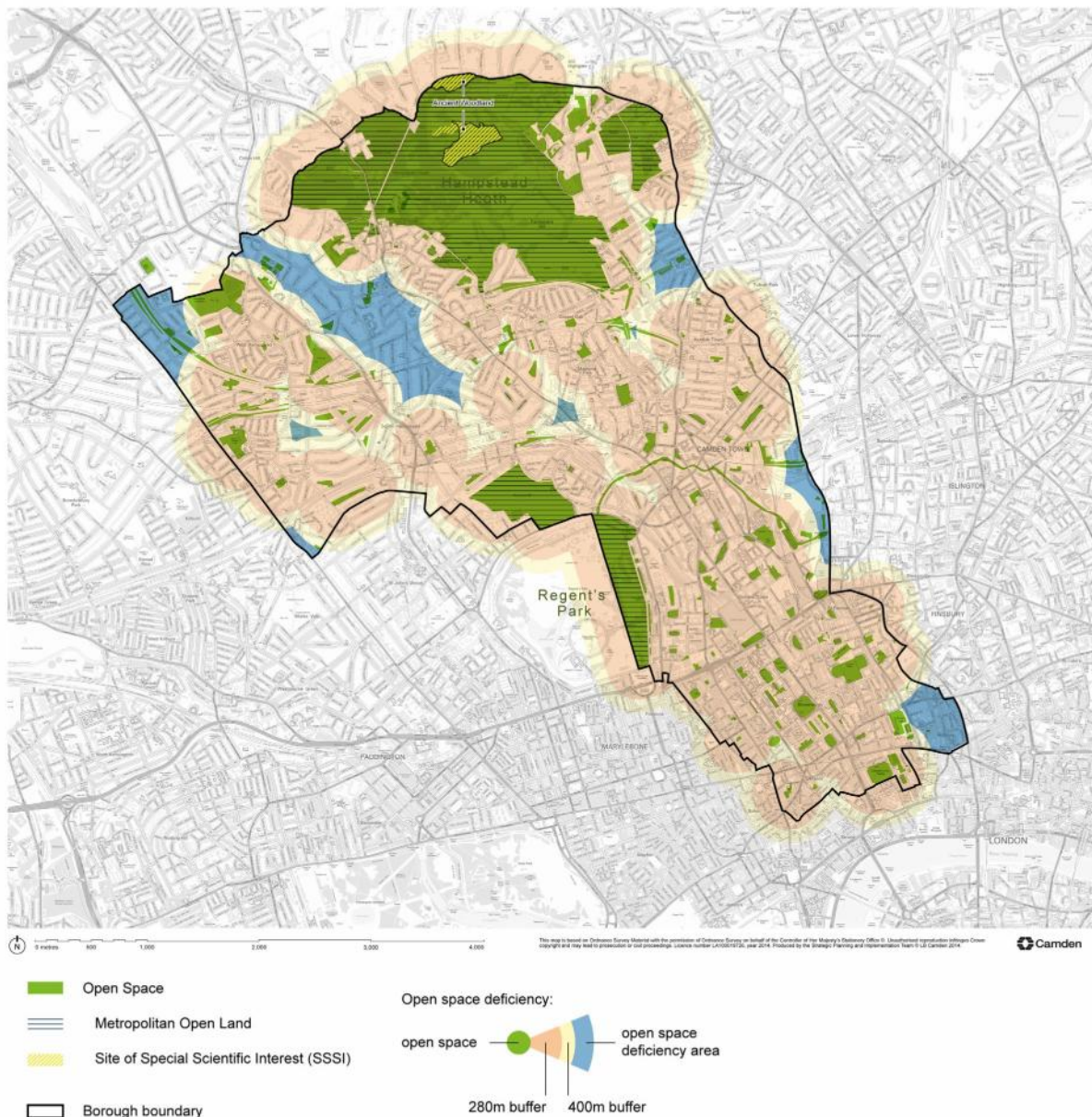
The Regent's Canal

- 6.46 The Regent's Canal winds through the borough from Regent's Park through Camden Town and meets the King's Cross regeneration in the front of Granary Square. It is maintained and managed by the Canal and River Trust.
- 6.47 It serves several purposes, from its open space, leisure and recreational functions and biodiversity importance to its historic significance and commercial and transport role.
- 6.48 Development near the Canal needs to reflect its unique character. The Council will therefore take into account the Regent's Canal Conservation Area Appraisal and Management Strategy when assessing applications for sites along and adjacent to the Canal.
- 6.49 The Canal is designated as a Site of Metropolitan Importance for Nature Conservation. The section at Albert Road near London Zoo provides an unlit green space at night for foraging bats.
- 6.50 We will ensure that the demand for new permanent moorings does not interfere with movement on the canal or towpath and can be adequately serviced.

The Regent's Park including Primrose Hill

- 6.51 Regent's Park and Primrose Hill are distinct but contiguous public parks with park management responsibilities undertaken by The Royal Parks (TRP) agency, although significant responsibilities are held by the Crown Estate and Crown Estate Paving Commission.
- 6.52 When assessing planning applications we will have regard to relevant management strategies including The Regent's Park and Primrose Hill Management Plan (TRP) and the conservation area appraisals and management plans prepared by Camden Council for Regent's Park, Primrose Hill, Regent's Canal and Elsworthly.
- 6.53 Regent's Park is a planned composition of landscape and buildings. The area in Camden includes informal playspace and the borough's only rugby pitch.
- 6.54 Primrose Hill is a highly valued open space. The view towards Central London is designated as a London Panorama in the London Plan. There are Protected Vistas towards the Palace of Westminster and St. Paul's.
- 6.55 Tackling open space deficiency and responding to the demand for additional and improved public open space
- 6.56 Access to public open space varies quite markedly across the borough. The Camden Open Space, Sport and Recreation Study 2014 identified areas in the borough which are poorly served by public open space and for specific types of provision, e.g. children's play areas.

Map 2: Open Spaces



- 6.57 Developments that are likely to lead to an increased use of public open space will be expected to mitigate their impact. Camden Planning Guidance 6: Amenity supplementary document sets out the size and type of developments considered to increase demand on public open space and explains how the Council will mitigate this impact. It sets out the catchment areas or 'accessibility standards' used by the Council to establish whether open spaces are capable of addressing the needs of the development (e.g. amenity spaces and children play areas should be within an easy walking distance of the development).
- 6.58 Securing the direct provision of new areas of public open space on site will generally be a priority in larger development schemes. This can include providing access to open spaces which are not currently in public use. The Council will continue to use its open space standard of 9sqm per residential occupier and

0.74sqm per employee/ student (commercial/higher education developments). The difference between the standards recognises that workers tend to use open space for fairly limited periods. Camden Planning Guidance 6: Amenity supplementary document takes account of the future occupation of a development in determining how much open space needs to be provided.

- 6.59 The type of open space required will depend on the size and nature of the development. In the case of large-scale residential developments, open space of all kinds is likely to be expected. Amenity open space will always form a component of the open space which is required. Natural and semi-natural green space would also normally be required as a component of this direct provision.
- 6.60 Given the amount of hard surfaces in Camden, the priority will be increasing the supply of areas of 'soft' landscaping, i.e. green amenity areas and parks which provide for passive recreation. All new open spaces should be designed to the highest standards of accessibility, comfort, security and ease of movement and incorporate high quality landscaping, planting, street furniture and surfaces commensurate with their intended function.

Provision of playspace and recreation space for children and young people

- 6.61 Provision of children's playspace and young people's recreation space will be required on residential schemes which generate a need. Although there are 66 formal play areas¹³ in the borough, most wards have areas which are outside of a 400 metre catchment for this type of provision. While informal playspace¹⁴ may address this deficiency to some degree, it is not a direct substitute and therefore addressing shortfalls in formal provision remains important. Where a development generates a need for playspace, the Council will use a benchmark standard of 2.5 sqm when assessing provision. This provision could be brought forward at new open spaces or through the adaption / redesign of existing spaces. New playspaces should offer a range of facilities commensurate with their size.

Provision of other types of public open space

- 6.62 Allotments and community gardens provide an opportunity for people to grow affordable, fresh food, to take physical exercise and meet people. It contributes to sustainability objectives by reducing the distance food needs to be transported and the use of packaging and can recycle waste as compost. There are seven allotment sites in Camden and two community gardens. All the allotment sites are operating at or near 100% capacity. Community or similar managed provision will be sought wherever an opportunity arises and there is evidence of need in the local area. While the Council will not use a benchmark standard for allotments or community gardens, we will take their provision into account in determining the overall level of open space provision. Roof or balcony gardens may be appropriate on the smallest and most restricted sites. A variety of organisations are engaged in local food production.
- 6.63 In a highly developed area such as Camden, there are very limited opportunities to provide additional full sized sports pitches. There are 19 pitches in total, predominantly used for football (13 with artificial turf). Various other types of outdoor sports facilities include tennis courts, Multi-Use Games Areas (MUGA) and outdoor gyms. The low number of pitches accompanied by a young

demographic profile highlights the importance of retaining existing provision. As with food growing areas, there is no benchmark standard for the provision of outdoor sports facilities but we will take into account provision of outdoor sports facilities when determining the overall level of open space provision.

Use of financial contributions for public open space

- 6.64 The ability to provide public open space on-site will inevitably vary according to the constraints of the site. The Council's priority will be to secure new areas of open space on-site. However, where this is not practicable, we will consider the provision of suitable areas of open space off-site, including where this brings open space with restricted access into public use. Where it is not possible to secure the direct provision of public open space, e.g. due to site constraints, the Council may require a financial contribution in lieu of provision towards public open space improvements and management due to increased usage or to enable the provision of new open space.
- 6.65 Once the Community Infrastructure Levy (CIL) is adopted by the Council, it is envisaged this will remove the need for financial contributions to be collected through planning obligations (i.e. through Section 106 agreements) in the majority of cases. The use of CIL would mean a broader range of development would be required to pay towards public open space than is currently the case.
- 6.66 The Council has a number of initiatives which seek to improve the quality and accessibility of public open spaces. This includes widening the function or use of parks where this is not in conflict with their character and the provision of more attractive access routes for walking and cycling. In the south of the borough where it is most difficult to provide open space, the Council is creating more usable and attractive spaces within the street environment through highways works (e.g. the West End Project).

Amenity land on housing estates

- 6.67 Many housing estates in the borough are set in areas of amenity land, which can be underused, neglected and attract antisocial behaviour. The lack of use can arise from the poor arrangement of these spaces, their lack of definition and identity and weak or non-existent links to other open spaces.
- 6.68 In such cases, where the land is of poor quality and has no value as open space, there is benefit in supporting the reorganisation of the open space across the estate, in conjunction with the re-provision of more usable and functional public open spaces with improved surveillance. The Council's Community Investment Programme is delivering new and improved open spaces and play areas on housing estates as a component of wider regeneration schemes.

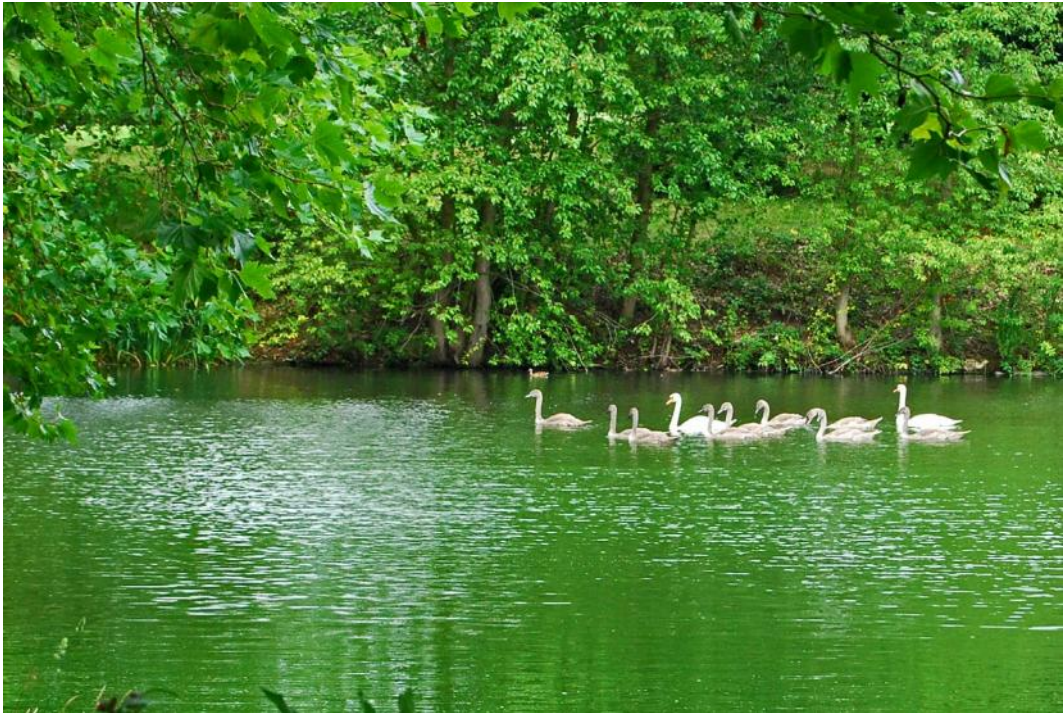
Local green spaces

- 6.69 The National Planning Policy Framework (NPPF) introduced the concept of Local Green Spaces and says that local communities should be given the opportunity to identify green areas of particular importance to them. These designations would rule out development other than in very special circumstances. A local green space should be within reasonably close proximity to the community it serves, be demonstrably special to a local community and hold a particular local significance, be local in character and not form an extensive tract

of land. Land can be considered for designation even if there is no public access. Neighbourhood plans have been the most common method by which communities have identified local green spaces.

Protection, enhancement and management of biodiversity

- 6.70 Biodiversity helps to provide us with a variety of vital services and benefits. Trees and plants improve air quality, absorb carbon dioxide and help to regulate city temperatures; vegetated areas reduce surface water run-off and flooding risk; and insects such as bees provide valuable pollination services.



- 6.71 There are also a number of social, cultural, education, health and recreation benefits provided by biodiversity. Attractive green environments with biodiversity value provide a space for quiet contemplation and boost mental well-being. Local Nature Reserves and other natural sites provide a focus for conservation activities forging the community spirit and social inclusion. These sites provide a rare opportunity for young people living in the urban area to learn about the natural environment.
- 6.72 Although Camden is predominantly built-up, about 430 hectares of land in the borough across 186 spaces is classed as having biodiversity importance. Amenity grassland is the most prevalent habitat and be found across Camden. It has limited biodiversity value but does offer scope for improvement. Woodland is the second most prevalent habitat and supports a range of wildlife but is mainly in the north of the borough, meaning it is not accessible to all residents. There are also smaller areas of UK BAP habitat (i.e. of national importance) including acid grassland, heathland, ponds and reedbeds.
- 6.73 There are a range of wildlife designations which reflect their national, regional and local importance. Around three quarters of all provision is found within 4 large sites of metropolitan importance.

- 6.74 This policy is intended to support the London and Camden Biodiversity Action Plans (BAPs)¹⁵ by ensuring Camden's growth is accompanied by a significant enhancement in the borough's biodiversity, for example through the expansion of the local ecological network and an increase in the population and extent of rare species.
- 6.75 We intend to maximise opportunities for biodiversity enhancement in and around developments in order to deliver a net gain in biodiversity. This means protecting existing nature conservation sites and seeking opportunities to create new habitats within the fabric and curtilage of buildings, such as green roofs and walls, and achieving better ecological connectivity through extending and reinforcing green corridors.

Policy A3 Protection, enhancement and management of biodiversity

The Council will protect and improve sites of nature conservation and biodiversity.

We will:

- a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;
- b. resist development which would directly or indirectly result in the loss, reduction in area or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;
- c. protect other green areas with nature conservation value, including gardens, where possible;
- d. assess developments against their ability to enhance biodiversity through incorporating measures to support wildlife, proportionate to the scale of development proposed;
- e. on larger sites, we will seek satisfactory levels of natural greenspace, including the creation and restoration of BAP habitat;
- f. ensure that benefits for biodiversity and ecology are realised in the layout, design and materials used in the built structure and landscaping elements of a proposed development;
- g. secure biodiversity improvements to habitat corridors, particularly where a development scheme is adjacent to an existing habitat;
- h. improve opportunities to experience nature, in particular where such opportunities are lacking;
- i. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to species and ecologically sensitive areas;
- j. secure management plans to ensure that nature conservation objectives are met; and
- k. work with The Royal Parks, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.

Trees

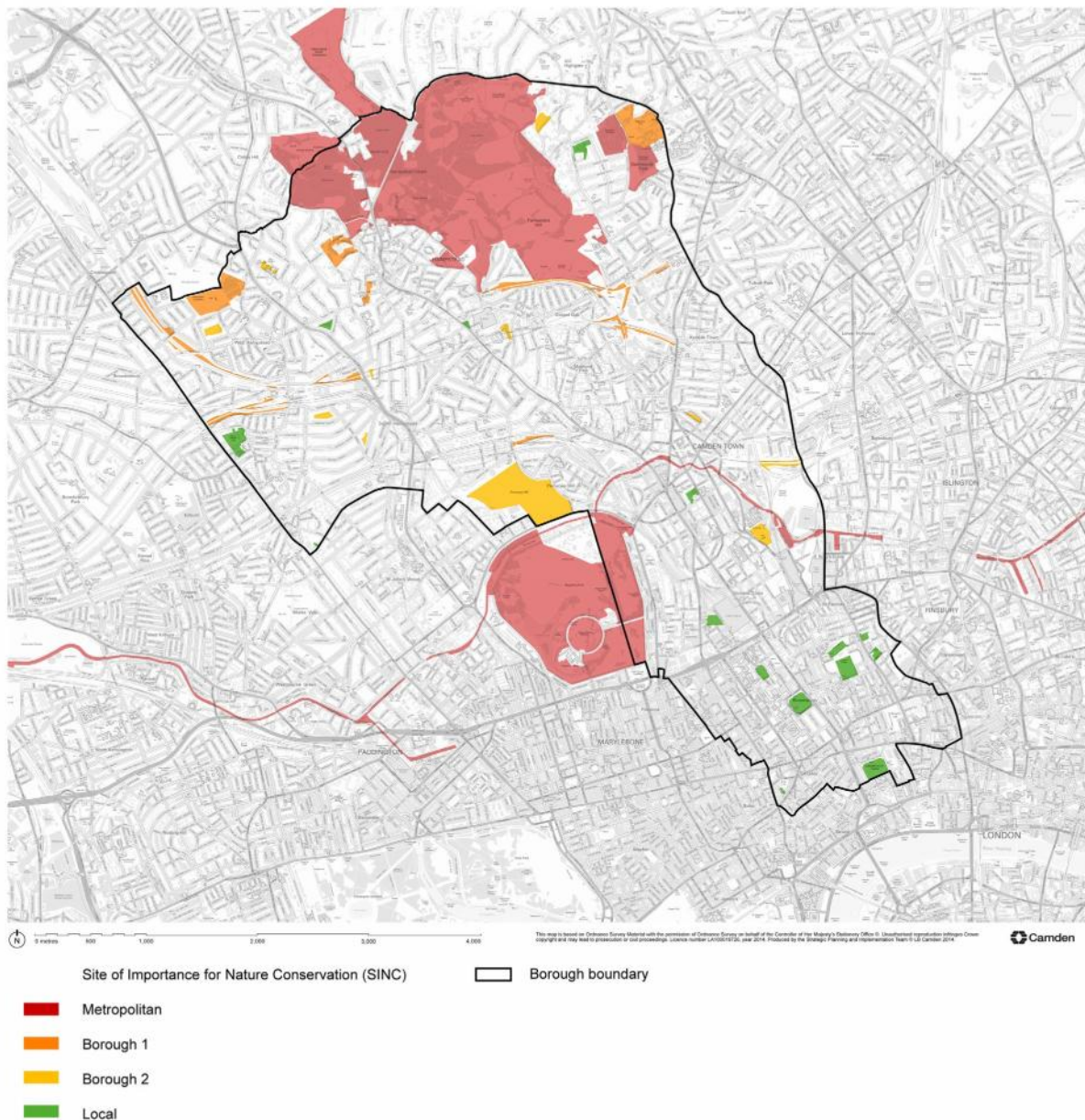
We will:

- l. protect trees, including street trees, and prevent the loss of trees of amenity value;

- m. expect replacement trees or mitigation measures to be provided where the loss of, or impact on, trees in a development proposal is considered acceptable; and
 - n. expect developments to incorporate additional trees wherever possible.
-

Protection of designated nature conservation sites and safeguarding protected and priority habitats and species

- 6.76 Designated sites of nature conservation interest are shown on the Proposals Map. They are as follows:-
- 6.77 Hampstead Heath Woods SSSI is the only SSSI in Camden (managed by English Heritage). The SSSI contains ancient woodland. Sites of Special Scientific Interest (SSSI) are the country's best wildlife and geological sites and we will give its protection the highest priority.
- 6.78 There are 4 Local Nature Reserves (LNR) which provide opportunities for local communities to access and engage with nature – Adelaide Wood, Belsize Woods, Westbere Copse (all managed by Camden Council) and Camley Street Nature Park (managed by London Wildlife Trust). They host a rich variety of flora and fauna.
- 6.79 There are numerous Sites of Importance for Nature Conservation (SINC) which are graded into four types according to spatial significance and quality (Metropolitan, borough Grade 1, borough Grade 2 and Local). They occupy some 414ha of land. SINC in Camden include parks, London Squares, the private grounds of houses, community gardens, cemeteries and green corridors e.g. railway sidings. They are owned and managed by a variety of organisations and are non statutory nature conservation sites. The sites have recently been reviewed by the London Wildlife Trust. This has led to three new sites being identified and a number of boundary changes, which are reflected on the Proposals Map.

Map 3: Sites of Importance for Nature Conservation

- 6.80 The Regent's Canal – a Metropolitan SINC - forms part of the 'Blue Ribbon' network of strategic waterspaces identified by the Mayor of London. The Canal supports a range of aquatic flora, fish species, invertebrates, waterfowl and a variety of waterside plants growing on its brickwork and banks. The Canal's character and biodiversity value should be protected and enhanced.
- 6.81 Sites designated for their nature conservation value will receive special attention proportionate to the weight afforded by these designations, taking account of management plans if available. We will resist the development of designated sites where the nature conservation value has been diminished or lost, especially where this is due to neglect or damage. Where possible, the Council will work with partners to restore the biodiversity value of these spaces.

- 6.82 Camden has species protected under UK and European legislation. The presence of protected species is a material planning consideration if a development is likely to result in harm to a habitat or species. Priority species and habitats of principal importance to the conservation of biodiversity are identified in the Camden Biodiversity Action Plan (BAP) which we must consider in making planning decisions. The BAP contains targets and actions to improve and enhance habitats and support species.
- 6.83 In determining planning applications, the Council will secure, retain and enhance significant features of nature conservation. Any loss or adverse impacts on habitats and species, including sites in the vicinity of nature conservation designations, should be kept to a minimum. We would expect areas of remnant vegetation, which are ecologically important, to be retained as far as possible, or replaced. The Council will expect appropriate measures to be taken to guard against the indirect impacts of a development on wildlife, such as noise, light, shading and increased human presence.
- 6.84 Applicants will be expected to establish the quality of the existing biodiversity and the potential for enhancement prior to scheme design. Camden Planning Guidance 3: Sustainability supplementary document explains how ecological and habitat surveys are used to establish the presence of protected species and understand how habitats and species could be affected by a proposed development. A survey and assessment may also be required to identify which trees which should be retained and ensure they are adequately protected (BS5837: Trees in relation to demolition, design and construction).

Increasing nature conservation value

- 6.85 On the largest schemes where development is considered to place a significant additional demand on natural greenspace, the Council will seek the provision of new natural and semi-natural greenspace within the site. Camden Planning Guidance 6: Amenity supplementary document sets out the size of scheme this relates to and how much greenspace will be sought based upon occupancy rates. The layout and type of new habitats should take into account the site's role in buffering and connecting open spaces and contribute to habitat creation targets in the BAP. Wildlife features should be integrated throughout the site, rather than being isolated pockets of nature.
- 6.86 Where on-site provision is not possible, the impact should be mitigated through works to create, reinstate or enhance habitats nearby. The Council may use planning obligations to secure contributions to mitigate the site impacts. This will not be used to contribute projects being funded through the Community Infrastructure Levy.
- 6.87 In many developments, it should be feasible to incorporate biodiversity enhancing measures. These can deliver a wide range of environmental and social benefits. This includes retrofits of existing buildings, subject to impacts on heritage assets and amenity. Camden Planning Guidance 3 outlines potential responses including biodiverse rich landscaping, 'species features' such as bird and bat boxes, tree planting and urban greening. We will usually seek to negotiate the provision of living roofs in all suitable developments.

- 6.88 The Council is engaged in various projects to create and restore habitats and green the public realm. This includes achieving better connections between natural habitats through green routes and corridors. These allow species to commute and gain access to food and water and may offer suitable routes for walkers and cyclists. The review of SINC's shows six Strategic Wildlife Corridors – these are linear routes important for the movement of wildlife and include the 'Nash Ramblas' Link corridor, the Hampstead Ridge Link corridor and other green routes, incorporating the Regent's Canal and railway lines.
- 6.89 As highlighted in the Open Spaces policy, the Mayor of London is supporting the development of a multi-functional network of accessible spaces and natural features (the All-London Green Grid). Improvements to strategic Green Infrastructure routes will potentially form projects appropriate for funding through the Community Infrastructure Levy (CIL) with planning obligations continuing to be used for site specific matters, e.g. the retention or enhancement of a bat foraging area.
- 6.90 Landscaping and planting needs to be carefully considered throughout a development. Planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, sunlight and shade), the ability to attract wildlife (e.g. nectar rich planting) and conserve water. We would expect the Planting scheme for sites adjoining, or in the vicinity of, a designated nature conservation site to reflect and complement the species composition of the designated site.

Increasing opportunities to experience nature

- 6.91 A key objective of the Camden BAP is to increase engagement with nature. There are typically lower levels of active engagement in more deprived areas of the borough. This is partly related to the limited spatial extent of natural habitat in these locations, where nature conservation sites are generally quite small. Parts of the west, east and south of the borough (the Central Activities Zone) have the lowest coverage. Some nature conservation sites provide no public access. In some cases, access is limited in order to safeguard the nature conservation interest. We will need to give particular priority to responding to the nature conservation deficit in these areas.
- 6.92 Of particular social benefit to the borough are the Local Nature Reserves. Their significant scale underpins a variety of learning and community based activity. It will be important that their value can be maximised. By raising awareness of our links, and dependence on the environment, these sites can foster an interest in the stewardship and condition of natural habitats.

Use of management plans to protect and sustain habitats

- 6.93 The demolition and construction process can pose a significant risk to ecology either directly or indirectly, including trees, and could pose harm to protected or rare species. The Council may request a construction management plan for developments adjoining/or within sites of high nature conservation value.
- 6.94 Once a development has been completed, ongoing management and monitoring of habitats may be required in order to maintain their biodiversity value. Monitoring is sometimes used to confirm that relevant environmental measures have been implemented successfully.

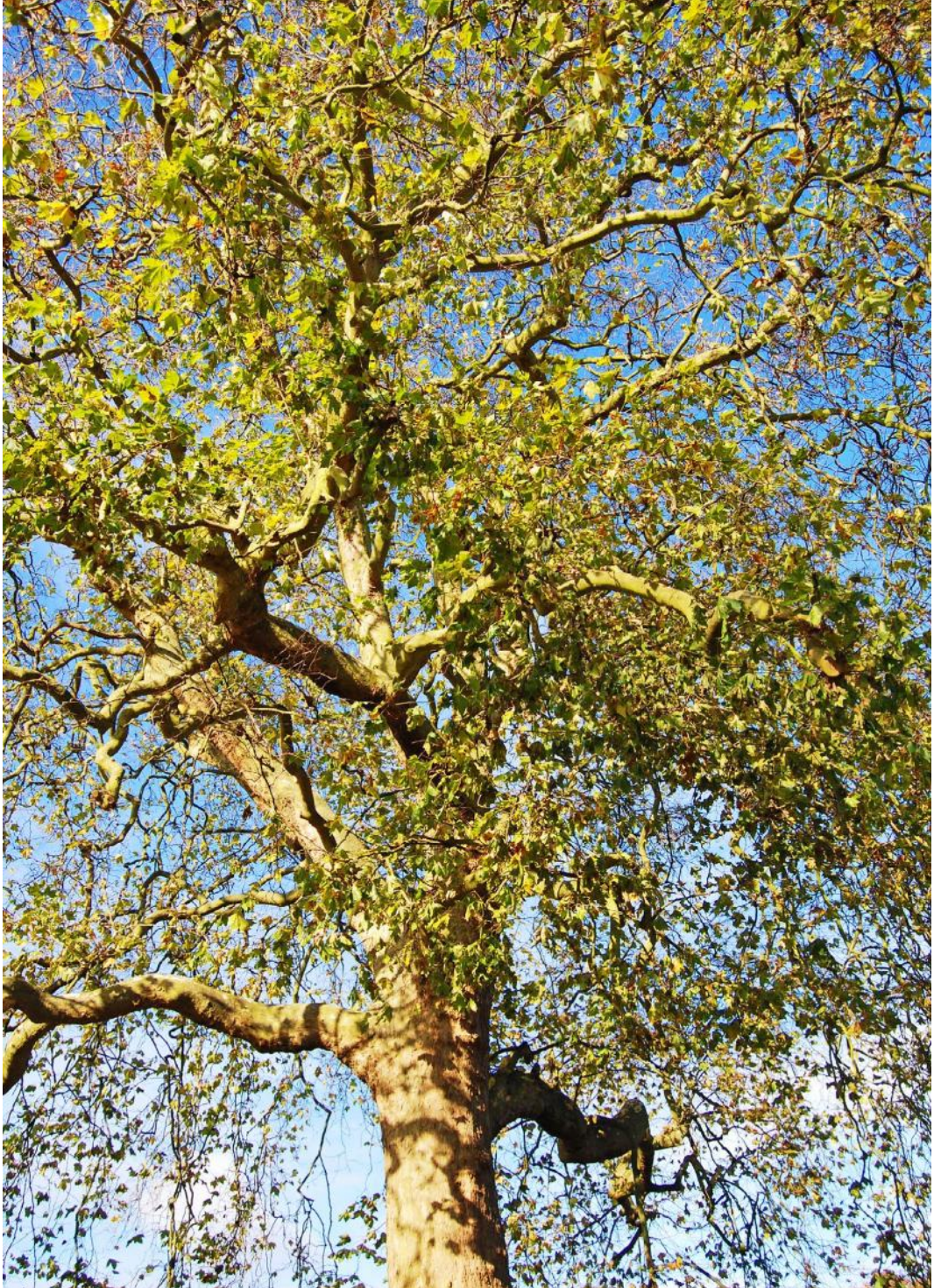
- 6.95 The construction management plans and habitat management plans may be secured by a legal agreement or a planning condition.
- 6.96 When considering proposals, we will apply a 5 point approach to planning decisions for biodiversity, based on the following principles – information, avoidance, mitigation, compensation and new benefits. This is set out in Table 2 below.

Table 2: Camden’s approach to planning decisions for biodiversity

- Information – We will require appropriate information at the outset on habitats and species and the impact of development on them.
- Avoidance – Developments should avoid adverse effects to wildlife and habitats as far as reasonably possible.
- Mitigation – Where avoidance is not possible, biodiversity impacts should be reduced as far as reasonably possible. We may use conditions or planning obligations / agreements to achieve this.
- Compensation – Appropriate replacement and compensation will be required if both 2. and 3. are demonstrated as being unachievable and permitting the development would be harmful to biodiversity. This will be on an exceptional basis where the benefits of the proposal clearly outweigh the biodiversity impacts.
- New Benefits – In all cases opportunities should be taken to enhance on-site biodiversity, or within the locality or borough, to provide new benefits for wildlife.

Trees

- 6.97 Trees contribute to the beauty and quality of the street scene, provide shade and cooling to offset the ‘heat island effect’, produce food, mitigate the risk of surface water flooding, filter pollutants from the air and prevent shrinking and heave during hotter weather. Many of Camden’s trees are native species reflecting local soil types and a legacy of development in the 18th and 19th centuries. Maintaining existing trees and vegetation can help new development integrate into its setting by providing a sense of maturity. The Council itself is responsible for managing and replenishing a stock of over 29,000 trees. Together with other London boroughs, Camden is contributing to the Mayor’s RE:LEAF campaign which commits to increasing tree cover in the capital by 5% by 2025.
- 6.98 The Council will retain and protect trees and groups of trees of significant amenity value and which make a positive contribution to the character and appearance of a conservation area. A Tree Protection Order (TPO) will be used to protect a tree or groups of trees because of their amenity value. Veteran or aged trees outside ancient woodland are particularly valuable as once lost they can never be replaced. Large species trees are also important in defining the character of streets and the multiple environmental benefits they provide and should be considered in schemes where the opportunity arises¹⁶.



6.99

The Council will expect developments to incorporate additional trees wherever possible as part of the package of biodiversity enhancing measures described above. We will take a 'right tree for the right site' approach which takes account of historic context, availability of space, soil conditions, potential improvements to air and soil quality and reducing the effects of and adapting to climate change. The ability to sustain an attractive treed environment will often be contingent on age and species diversification. Guidance on the Planting of new trees is set out in Camden Planning Guidance 1: Design supplementary document supplementary document.

Noise and vibration

- 6.100 Noise and vibration can have a major effect on health and amenity and therefore quality of life. The World Health Organisation recognise that excessive noise can seriously harm human health, disturb sleep and cause cardiovascular and behavioural effects.
- 6.101 Camden has a number of 'Important Areas', as defined by the Department for Food, Environment and Rural Affairs (DEFRA) (sometimes referred to as noise hot spots), with respect to road and rail noise and the Council are exploring ways to manage the impact of noise in these areas. The Council will also seek to explore the identification and designation of Quiet Areas, which are local green spaces identified for their particular tranquillity and amenity value.
- 6.102 This policy seeks to ensure that noise is appropriately considered at the design stage and that noise sensitive uses are not negatively impacted by noise or that existing uses are not unduly restricted through the introduction of nearby noise sensitive uses.

Policy A4 Noise and vibration

The Council will seek to ensure that noise and vibration is controlled and managed.

We will not grant planning permission for:

- a. development likely to generate unacceptable noise and vibration impacts;
or
- b. development sensitive to noise in locations with existing high levels of noise unless appropriate attenuation measures are provided.

Development that exceeds Camden's Noise and Vibration Thresholds (Appendix 2) will not normally be permitted.

We will only grant permission for noise generating development, including plant and machinery, if it can be operated without causing harm to amenity and does not exceed our noise thresholds. We will also seek to minimise the impact on local amenity from deliveries and the demolition and construction phases of development.

Conditions and planning obligations may be used where development is likely to cause harm or is in close proximity to noise sensitive uses.

Sources and the character of noise in Camden

- 6.103 Camden's high density and mixed use nature means that disturbance from noise and vibration is a particularly important issue for health and well-being in the borough. The main sources of noise and vibration in Camden are; road traffic, railways, industrial uses, plant and mechanical equipment, food, drink and entertainment uses, and building sites. The top six sources of noise that receive the most complaints in Camden are; music, construction noise, general people noise (e.g. footsteps, gathering), parties, fixed machinery and burglar

alarms. Further information on the character and sources of noise in Camden is contained in Camden's Noise Strategy (2002).

- 6.104 There is a proliferation of fixed machinery, such as air conditioning units in Camden's centres which cumulatively can have a harmful impact. Such sources of noise and the character of noise can increase stress levels and disturb sleep. Other sources of noise such as those associated with construction are considered in policy A1, whereby measures required to attenuate impacts are secured by legal agreement through Construction Management Plans.



Assessing the impact of noise and vibration

- 6.105 Where uses sensitive to noise and vibration are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application. In assessing applications, we will have regard to Noise and Vibration Thresholds, set out in Appendix 2, and other relevant National and Regional policy and guidance including the Noise Policy Statement for England (2010) and relevant British Standards.
- 6.106 The impact of noise and vibration is generally greater when the background noise level is lower or in areas where noise sensitive uses such as residential developments co-exist. The Council will take into consideration the general character of the noise (whether noise is intermittent, has a distinct screech, bang, hiss) and where appropriate, the cumulative impacts of noise from one or more noise sources and will assess whether tighter noise restrictions, secured by planning condition, should be imposed.
- 6.107 The effect of noise and vibration can be minimised by separating uses sensitive to noise and vibration from sources that generate them and by taking other design and operational measures to reduce any impact. Noise sensitive development includes housing, schools and hospitals as well as offices,

workshops and open spaces. The impacts on external amenity spaces such as gardens and balconies will also be considered. Our supplementary document Camden Planning Guidance 6: Amenity provides further information on how to minimise the impact of noise of developments; ways to mitigate noise emitted from developments and further detail on how the Council will assess the impact of noise and vibration.

6.108 Planning permission will not normally be granted for development sensitive to noise in locations that have unacceptable levels of noise and vibration. The Council will normally only grant planning permission for development sensitive to noise and vibration, in locations that experience high levels of noise and for development likely to generate noise impacts, if appropriate attenuation measures are taken. Planning permission will not normally be granted in instances where there will be a significant adverse impact on external amenity areas including gardens, balconies and open spaces unless they can be appropriately mitigated.

6.109 We will also consider the impact of attenuation measures on the character and appearance of the building and locality, please see policy D1 and associated Camden Planning Guidance 1: Design supplementary document supplementary document. As noted above, measures to mitigate the impacts of noise and vibration associated with demolition and construction will be secured by legal agreement through Construction Management Plans.

Internal noise levels

6.110 The Council will seek to ensure that internal noise levels of all new development are suitable and sufficient and reflect the most up to date and appropriate guidance. This will be of particular relevance to new residential developments in areas of existing noise but will also include other noise sensitive uses. Conditions may be imposed to require that suitable internal noise levels are achieved and where appropriate, post installation testing to demonstrate that the standards have been met.

6.111 Assessments must also include consideration to vibration levels adjoining sources of vibration such as roads, railways, leisure and entertainment premises and/or plant and machinery.

Plant and other noise generating equipment

6.112 Planning conditions will be imposed to require that the Plant and equipment which may be a source of noise is kept working efficiently and within the required noise limits and time restrictions. For air conditioning plant please also refer to policy CC2 (Adapting to climate change). Conditions may also be imposed to ensure that attenuation measures are kept in place and are effective throughout the life of the development.

6.113 Emergency equipment such as generators which are only to be used for short periods of time will be required to meet the noise criteria of no more than 10dB above the background level (L90 15 minutes). During stand by periods, emergency equipment will be required to meet the usual criteria for plant and machinery. Conditions to this effect may be imposed in instances where emergency equipment forms part of the application.

- 6.114 Security alarms cause disruption to local amenity and whilst this would generally not require planning permission, we would suggest that developers and householders install silent alarms or alarms with a maximum of a 20 minute cut out and follow best practice for the management of alarms.

Food, drink, entertainment and leisure noise

- 6.115 Assessments for noise from entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and general activity. The impact of noise and vibration from food, drink and entertainment uses is outlined in policy TC4. Generally, these uses and noise from leisure uses alter the noise environment through audio devices, amplified and unamplified music, footfall, congregations of people, plant and equipment, deliveries and transport.

Delivery management

- 6.116 Deliveries, collections and the loading and unloading of goods and refuse can be a source of disruption and cause noise nuisance to nearby residential properties, particularly when undertaken at night. Therefore, to manage potential noise issues from deliveries, conditions will usually be imposed to require deliveries, collections and the loading and unloading of goods and refuse take place only between the hours of 08:00 to 20:00.
- 6.117 Developments requiring deliveries outside of these times will be required to provide an acoustic report to demonstrate there will be no adverse impact on the acoustic environment with particular reference to residential occupiers as a result of these activities. This could be inserted within the wider Delivery and Service Management Plan of the site. Further guidance on noise and vibration can be found in Camden Planning Guidance 6: Amenity supplementary document.

Basements and lightwells

- 6.118 With a shortage of development land and high land values in the borough, the development of basements is becoming increasingly popular as a way of gaining additional space in homes. Basements are also often included in developments in the Central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage.
- 6.119 Basement development and other development which involves excavation changes the ground and water conditions of the area which can potentially lead to ground instability or flooding. Basement development can also have significant construction impacts due to the need to remove spoil, and the complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours properties and buildings from these impacts.
- 6.120 The following policies in this Local Plan are relevant to basement development and will be taken into account when assessing basement schemes including:
- A2 Provision and enhancement of open space;
 - A3 Protection, enhancement and management of biodiversity;
 - D1 Design;
 - D2 Heritage and Conservation; and
 - CC3 Water and flooding.

Policy A5 Basements and Lightwells

The Council will only permit basement or other underground development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area; and
- c. the character and amenity of the area.

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

Basement development should not:

- d. exceed a maximum of 50% of each garden;
- e. comprise more than one storey;
- f. be built under an existing basement, or
- g. involve excavation underneath a listed building (including pavement vaults) or any garden of a listed building.

Exceptions to d), e), and f), above may be made on large comprehensively planned sites.

We will require applicants to demonstrate that proposals for basements:

- h. maintain the structural stability of the building and neighbouring properties;
- i. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- j. do not harm the structural stability of the host building or neighbouring or the water environment in the local area;

- k. avoid cumulative impacts;
- l. do not harm the amenity of neighbours;
- m. do not lead to the loss of open space or trees of townscape or amenity value;
- n. provide satisfactory landscaping, including adequate soil depth;
- o. do not harm the appearance or setting of the property or the established character of the surrounding area;
- p. protect important archaeological remains; and
- q. does not prejudice the ability of the garden to support trees where they are part of the character of the area.

We will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

In determining applications for lightwells, the Council will ensure that:

- r. the architectural character of the building is protected;
 - s. the character and appearance of the surrounding area is preserved and enhanced; and
 - t. the development does not result in loss of more than 50% of the front garden or amenity area.
-

Basement development

- 6.121 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.
- 6.122 The Council will therefore require evidence in the form of a Basement Impact Assessment (BIA) to be carried out by appropriately qualified professionals which includes geotechnical, structural engineering, and hydrological investigations and modelling from applicants to ensure that basement developments do not harm the built and natural environment or local amenity. Basement Impact Assessments must be prepared according the specifications set out in Camden Planning Guidance 4: Basements and Lightwells supplementary document, and the Camden Geological, Hydrogeological, and Geological Study (ARUP 2010).
- 6.123 The level of information required will be commensurate with the scale and location of the scheme. All schemes will be expected to provide evidence against each of the considerations in policy A5 - Basements and lightwells. Schemes will also be expected to submit information which relates to any specific concerns for that particular scheme or location (e.g. any history of flooding at the site or in the vicinity of the site, the presence of underground watercourses, proximity to water bodies such as the ponds on Hampstead Heath, structural instability of the developed or of neighbouring properties, or unstable land).
- 6.124 The Council will ensure that basement development does not cause damage to neighbouring properties and will use the Burland Scale in assessing schemes, further details are set out in Camden Planning Guidance 4: Basements and Lightwells supplementary document.

Basement impact assessment

- 6.125 Information submitted with basement applications must be contained within a Basement Impact Assessment which is specific to individual sites and particular proposals. Where hydrological and structural reports are required, they should be carried out by independent professionals (e.g. Chartered Structural Engineers) according to the qualifications set out in Camden Planning Guidance 4: Basement and Lightwells.
- 6.126 In order to provide the Council with greater certainty over the potential impacts of proposed basement development we will generally expect an independent verification of Basement Impact Assessments, which is funded by the applicant. The circumstances where verification is required include:
- where a scheme requires applicants to proceed beyond the screening stage of Basement Impact Assessment;
 - where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow;
 - where there is conflicting evidence or for any other basement applications; or
 - where the Council feels that independent verification would be appropriate.
- 6.127 Basement Impact Assessments must contain a non-technical summary of the evidence that applicants have gathered against each stage of the assessment. This should be presented in a format which can be fully understood by those with no specialist technical knowledge in these matters.
- 6.128 Details of the requirements and process of Basement Impact Assessment are set out in the Camden Planning Guidance 4: Basements and Lightwells supplementary document. Applicants may also contact the Council about the level of information that should be provided for a particular scheme.

Cumulative impact

- 6.129 The cumulative effect of several underground developments in close proximity can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes, and the potential cumulative impact of other basement schemes in the area. Basement Impact Assessments must identify all other basements in the neighbouring area, including their extent and ground conditions, and make an assessment of the combined effect of underground development with all nearby basements considered together. The assessment must include existing development and planned development including schemes with planning permission and those to be developed under permitted development or with a Certificate of Lawful Development.

Demolition and construction

- 6.130 The demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. Many basement schemes are constructed in residential areas in close proximity to people's homes, with the construction works often involving significant disturbance (including removing significant quantities of spoil) extending for many months. Construction impacts including noise are also controlled by other legislation, in particular the Control of Pollution Act, and with traffic impacts under relevant highways legislation.

- 6.131 The Council will seek to minimise the disruption caused by basement development and will generally require Construction Management Plans to be submitted with applications. Construction Management Plans can be used to establish a community working group involving neighbouring residents to discuss, advise and make recommendations, before and during the construction period. Please see our Camden Planning Guidance 4: Basements and Lightwells supplementary document for further information on Construction Management Plans.

Basement Construction Plan

- 6.132 To ensure that basement development may be undertaken without causing damage to neighbouring properties and the water environment the Council may require the developer to provide a Basement Construction Plan. A Basement Construction Plan sets out detailed information relating to the design and construction of the basement with a view to minimising the impacts of the development on neighbouring properties and the water environment, and provides a programme of measures to be undertaken by the owner with the objective of maintaining the structural stability of the property and neighbouring properties. The developer must also ensure that throughout the construction phase a suitably qualified engineer from a recognised relevant professional body is engaged to monitor inspect and approve the construction works. The detailed requirements of a Basement Construction Plan are set out in Camden Planning Guidance 4: Basements and Lightwells supplementary document.

Size of basements

- 6.133 In addition to protecting against flooding, ground instability, and damage to neighbouring buildings as set out above the Council will also seek to control the overall size of basement development to protect the character and amenity of the area, the quality of gardens and vegetation, and to minimise the impacts of construction on neighbouring properties. Larger excavations cause greater construction impacts and duration and can have greater risks and complexity in construction.
- 6.134 In order to minimise these risks the Council will take a precautionary approach by generally limiting basement to a single storey and must not extend beneath more than 50% of the garden area . A single storey is approximately 34 meters in floor to ceiling height and cannot be horizontally subdivided to create additional floors. A small allowance for schemes with a basement swimming pool may be permitted, where appropriate.
- 6.135 Exceptions to the limit of one storey depth and extending under no more than 50% of the garden area may be permitted on large and comprehensively planned sites. Schemes where an exception may be made include:
- New major developments, for example schemes which comprise 1000sq m additional non-residential floorspace or 10 or more additional dwellings;
 - Large schemes located in a commercial setting; or
 - Developments the size of an entire or substantial part of an urban block.

Party Wall Act and security for expenses

6.136

Many types of basement developments such as excavation near a neighbouring building will require that building owners meet a number of obligations under the Party Wall etc. Act 1996. These obligations include serving advanced notice of works, stating whether you will be strengthening or safeguarding the foundations of the neighbouring property, and providing plans and sections. Under The Party Wall Act adjoining owners may request the building owner to provide a bond or insurances to provide security in the event of a dispute. Given the complex nature of basement development the Council encourages developers to offer security for expenses for basement development to adjoining neighbours. The Council encourages developers to offer security in all instances where basement schemes have a risk of causing damage to neighbouring properties. Security bonds may be provided either as part of a party wall agreement or as a separate private arrangement between the developer or owner and the neighbour.



Flood risk

6.137

The National Planning Policy Framework (NPPF) states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” (paragraph 100). The Council will not allow habitable rooms and other sensitive uses for self contained basement flats and other underground structures in areas at risk of flooding. No parts of the borough are currently identified by the Environment Agency as being prone to flooding from waterways although some areas are subject to localised surface water flooding, as set out in Map 6 and identified in the North London Strategic Flood Risk Assessment. Please see Chapter 8: Sustainability and policy CC3 – Water and flooding for more on the location of these areas and our approach to flooding.

- 6.138 The Council will require the submission of a development-specific flood risk assessment with applications for basements within flood risk areas identified on Map 6, in the Flood Risk Strategy, or in any future updated Strategic Flood Risk Assessment in line with the criteria set out in the National Planning Practice Guidance on Flood Risk, unless it can be demonstrated to the Council's satisfaction that the scale of the scheme is such that there is no, or minimal, impact on drainage conditions (refer to Camden Planning Guidance 3: Sustainability supplementary document for further information).
- 6.139 Some parts of Camden contain unusual and unstable subsoils, along with many underground streams and watercourses, making drainage and structural safety key concerns (including around Hampstead Heath). In such areas, applications for basement developments may be required to show through hydrological modelling whether it will be possible through the inclusion of drainage systems to prevent any significant harm from changes to groundwater levels or flow.
- 6.140 The use of Sustainable Urban Drainage Systems (SUDS) will be encouraged in all basement developments that extend beyond the profile of the original building. For basements that consume more than 50% of the garden space, and are considered otherwise to be acceptable, the use of SUDS will be required to mitigate any harm to the water environment. Further guidance on sustainable urban drainage is contained in policy CC3-Water and flooding.

Protection of gardens and trees

- 6.141 Basement development must not extend underneath more than 50% of the area of the garden. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees. Basement developments should mitigate any loss of storm water infiltration capacity or biodiversity habitat caused by that development by planting vegetation above the basement and other appropriate measures. This will usually take the form of a soft landscaping or retention pond on the top of the underground structure, which is designed to temporarily hold a set amount of water while slowly draining to another location. It will be expected that a minimum of 1 metre of soil be provided above the basement development, where this extends beyond the footprint of the building, to enable garden planting and for rainwater runoff and flood mitigation.
- 6.142 The Council will protect garden space and the ability of gardens to support canopy trees where they are part of the character of the area. The protection of garden space to support large canopy trees is of particular importance near to open spaces. Consideration should be given to the existence of trees on or adjacent to the site, including street trees, and the root protection zones needed by these trees. Where there are trees on or adjacent to the site, the Council will require an arboricultural report to be submitted as part of a planning application.

Listed buildings

- 6.143 Basement development underneath a listed building can harm the fabric, structural integrity, layout, inter-relationships and hierarchy of spaces, and architectural features of the building. For example, the addition of a floor level beneath the original lowest floor level of a listed building (basement, cellar, or

vault) may affect the hierarchy and historic integrity of the floor levels within the building. The Council will therefore generally resist proposals for basement development beneath listed buildings, or underneath the garden of a listed building. An exception may be made for gardens on large sites where the basement would not involve extensive modification to the foundation of the listed building by being substantially separate from the listed building.

- 6.144 Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve and enhance the character or appearance of the conservation area in which it is located. For more detail refer to policy D1 - Design and policy D2 - Heritage and Conservation.

Lightwells

- 6.145 Where basements and visible lightwells are not part of the prevailing character of a street, new lightwells should be discreet and not harm the architectural character of the building, or the character and appearance of the surrounding area, or the relationship between the building and the street. In situations where lightwells are not part of the established street character, the characteristics of the front garden or forecourt will be used to help determine the suitability of lightwells.
- 6.146 In plots where the front garden is quite shallow, a lightwell is likely to consume much, or all, of the garden area. This will be unacceptable in streets where lightwells are not part of the established character and where the front gardens have an important role in the local townscape.
- 6.147 Lightwells to the side or rear of a property should be set away from the boundary of a neighbouring property. Excessively large lightwells will not be permitted in any garden space.

7.Design and Heritage

Design

- 7.1 Good design is essential to create beautiful, sustainable, and inclusive places. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning. The Council will require a high quality of design for all buildings and spaces in the borough. When assessing design, we will also take into account guidance contained within Camden Planning Guidance 1: Design supplementary document supplementary document.

Policy D1 Design

The Council will require development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area.

We will require that development:

- a. is attractive and of the highest standard;
- b. respects local context and character and conserves or enhances the historic environment and heritage assets;
- c. is sustainable in design and construction;
- d. is carefully designed with regard to architectural detailing;
- e. uses attractive and high quality materials;
- f. contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. improves movement through areas with direct, accessible, and easily recognisable routes (legibility);
- j. is secure and designed to minimise crime and antisocial behaviour;
- k. is robust and flexible in use;
- l. responds to natural features and preserves gardens and other open space;
- m. incorporates well designed landscape design;
- n. incorporates outdoor amenity space;
- o. preserves significant and protected views;
- p. meets housing standards; and
- q. carefully integrates building services equipment.

Tall Buildings

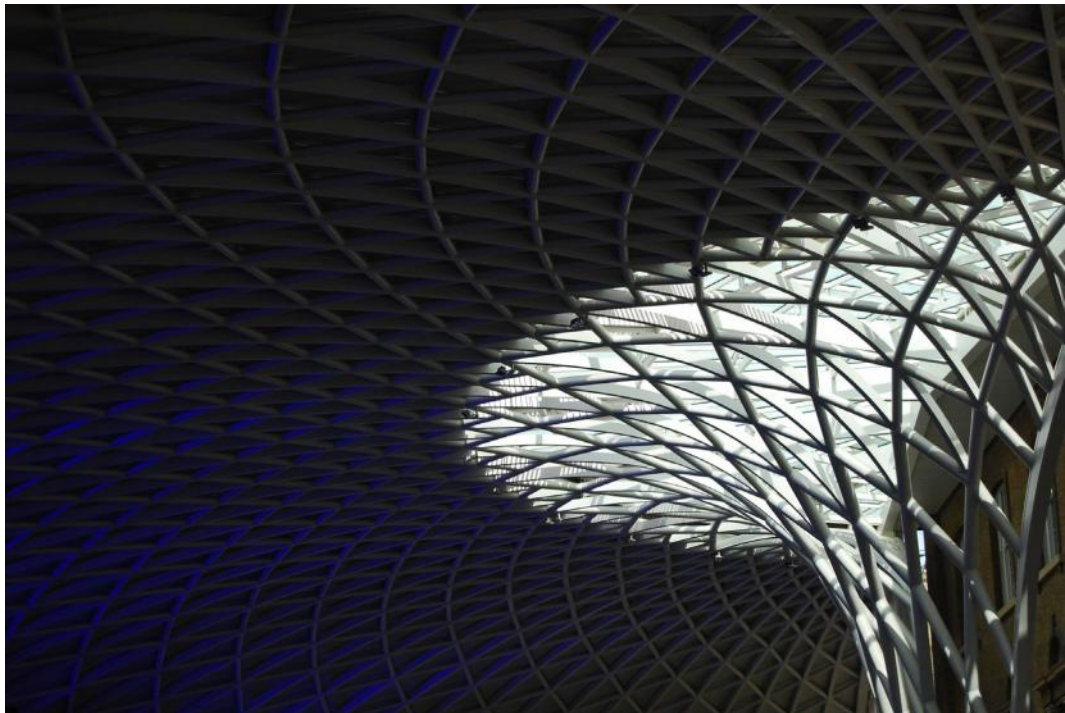
All of Camden is considered sensitive to the development of tall buildings (i.e. those which are substantially taller than their neighbours or which significantly change the skyline). Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- r. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape, and how the top of a tall building affects the skyline;
- s. the historic context of the building's surroundings;
- t. the relationship between the building and hills and views;
- u. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- v. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

Excellence in design

- 7.2 The Council seek to ensure that the significant growth planned for under Policy G1 will be provided in high quality contextual design. The Council encourages outstanding architecture and design in both in contemporary and more traditional styles. The Council will welcome high quality contemporary design unless a scheme is within an area of homogenous architectural style that is important to retain.



Character and the historic environment

- 7.3 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:
- character, setting, context and the form and scale of neighbouring buildings;
 - the character and proportions of the existing building, where alterations and extensions are proposed;
 - the prevailing pattern, density and scale of surrounding development;
 - the impact on existing rhythms, symmetries and uniformities in the townscape;
 - the composition of elevations;
 - the suitability of the proposed design to its intended use;
 - inclusive design and accessibility;
 - 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.

- 7.4 Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. 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. Planning applications should include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character.
- 7.5 Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens, and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.
- 7.6 The Council has two sets of documents which describe the character and appearance of areas and set out how the Council will conserve and enhance these areas. Conservation areas are covered by the Conservation Area Statements, Appraisals, and Management Plans, and in the remainder of the borough is covered by the Camden Character Study. These documents 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. Policy D2 - Heritage and Conservation provides further guidance on the preservation and enhancement of the historic environment.

Sustainable design and construction

- 7.7 The Council expects design to be sustainable in design and construction. The Council's approach to sustainability is set out in Chapter 8: Sustainability and in Camden Planning Guidance 3: Sustainability supplementary document.

Details

- 7.8 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 should be retained wherever possible, as their loss can harm a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.

Materials

- 7.9 Schemes should incorporate materials of a high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone, 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.

Street frontages

- 7.10 Building facades should be designed to reach out and offer active frontages to street. Active frontages add interest and vitality to public spaces. Views into buildings provide interest to passers-by and a views out of buildings provide safety through passive surveillance or 'eyes on the street'. Positive factors for

active frontages are entrances, shopfronts, and windows. Negative factors include long blank facades, high boundary walls, solid roller shutters and service entrances and yards.

Access

- 7.11 Good access benefits everyone. The Council requires new buildings and spaces to be inclusive and accessible to all. As accessibility is influenced by perceptions as well as physical factors, buildings should also be designed to appear, as well as be, fully accessible. The Council will require Design and Access Statements for developments to show how the principles of inclusive design, ensuring access for all, have been integrated into the proposed development, and how inclusion will be maintained and managed.
- 7.12 Making roads and pavements and the spaces between buildings fully accessible is as important as making the buildings themselves accessible. The Council will seek improvements for all pedestrians to ensure good quality access and circulation arrangements, including improvement to existing routes and footways. The Camden Streetscape Design Manual and our supplementary guidance documents Camden Planning Guidance 1: Design supplementary document and Camden Planning Guidance 6: Amenity supplementary documents provide more detailed guidance on this issue.
- 7.13 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 C5 - Access for all and Policy D2 – Heritage and conservation provide further guidance on providing access to listed buildings.

Health

- 7.14 The way an area is planned and managed can have a significant impact on people's quality of life, health and well-being. Planning has a key role in promoting good physical and mental health by creating streets, spaces, and buildings which allow and encourage healthy lifestyles. Architecture and urban can affect human health through the quality and design of buildings, access to open space and nature, air quality, noise, sustainable forms of transport, crime reduction and social cohesion. The Council will require development to consider how it will contribute to improving health. Refer to Policy C1 on health and well-being for further information.

Legibility

- 7.15 Legibility refers to the ability for people to find their way around an area. Designs should provide recognisable routes and be easy to understand. Buildings and spaces should be permeable by providing clear and direct routes between places and by putting people before traffic.

Secure design and crime prevention through urban design

- 7.16 Design should create safe and attractive places and be designed to prevent crime and antisocial behaviour. The impacts of proposals on crime and community safety should be considered and addressed from an early stage in

the design process to prevent the need for reactive security measures. Access and movement routes, the layout of buildings, overlooking and active frontages, lighting, the clear delineation of spaces and ownership, and the creation of activity all play a role in designing out crime. The Council seek to maintain good accessibility in urban areas to foster flows of movement which produce vitality and natural surveillance and in doing so increase safety. Gating as a solution to crime and antisocial behaviour problems will be resisted unless there are exceptional circumstances. Further details are set out in Camden Planning Guidance 1: Design supplementary document and in the document Safer Places – The Planning System and Crime Prevention (ODPM April 2004). Please refer to Policy C4 - Safety and security for further information.

Robustness and flexibility

- 7.17 Where appropriate design should be robust and flexible. Robustness refers to the ability for a building or space to accommodate change over time, being adaptable for a range of uses, and being designed to last. Robustness is influenced by factors including the size and shape of rooms, points of access and the depth of floorplates. The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.



Responding to natural features and preserving gardens and other open space

- 7.18 New developments should respond to the natural assets of a site and its surroundings, such as slopes and height differences, trees and other vegetation.
- 7.19 Extensions and new developments should not cause the loss of any existing natural habitats, including in private gardens. Policy A2 - Open Spaces provides further guidance on nature conservation in Camden and the Council's strategy for trees.

7.20 Development within rear gardens and other undeveloped areas can often have a significant impact upon the amenity and character of an area. The Council 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.

7.21 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.

Landscape design

7.22 The Council will expect development schemes to provide a high standard of landscape design, and encourage the development of green and brown roofs and walls. As with buildings consideration of context is essential in the design of new hard and soft landscaping whilst considering access requirements. Where appropriate, the Council will expect planting plans to be accompanied by a maintenance schedule. Detail on our approach to landscaping is set out in Camden Planning Guidance 1: Design supplementary document supplementary document and Camden Planning Guidance 3: Sustainability supplementary document.

Amenity space

7.23 Private outdoor amenity space including gardens, balconies, and roof terraces 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. Refer to policy A2 - Open Spaces for how the Council will ensure that new open space is provided in development. The Council also requires that the residential amenity of neighbours be preserved in accordance with policy A1- Managing the impact of development.

Views

7.24 A number of London's most famous and valued views originate in, or extend into, Camden. These are:

- views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill;
- views of the Palace of Westminster from Primrose and Parliament Hills; and
- background views of St Paul's from Greenwich and Blackheath.

7.25 The Council will protect these views in accordance with London-wide policy and will resist proposals that would harm them. Where existing buildings that affect a view are redeveloped it is expected that any replacement building will be of a height that does not harm the view. The current framework for protecting these views is set by the London Plan (policies 4B.16 - 4B.18) and the Mayor's London View Management Framework supplementary planning guidance.

7.26 The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces. They should seek to avoid buildings that tightly define the edges of the viewing corridors and not create a crowding effect around the landmark.

7.27 The Council will also seek to protect locally important views that contribute to the interest and character of the borough. These may include:

- views of and from large public parks and open spaces , such as Hampstead Heath, Kenwood Estate, Primrose Hill and Regent’s Park, including panoramic views, as well as views of London Squares and historic parks and gardens;
- views relating to Regent’s Canal;
- views into and from conservation areas; and
- views of listed and landmark buildings and monuments and statutes (for example, Centrepont, St Stephen’s, Rosslyn Hill and St George’s, Bloomsbury).

7.28 The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not generally be acceptable if it obstructs important views or skylines, appears too close or too high in relation to a landmark or impairs outlines that form part of the view. Further guidance on important local views is set out in our supplementary planning documents, for example in individual conservation area statements, appraisals and management plans.



Housing standards

7.29 All residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use:

- is self-contained and have their own secure private entrance;
- has good ceiling heights and room sizes;
- is dual aspect except in exceptional circumstances;
- has good natural light and ventilation;
- has good insulation from noise and vibration;

- has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- incorporates adequate storage space;
- incorporates outdoor amenity space including balconies or terraces; and
- is accessible and adaptable for a range of occupiers.

7.30 The Council will also require development to adhere to the standards set out in the London Plan, and the related GLA Housing Supplementary Planning Guidance. The Government has consulted on changes to the existing system of housing standards. If introduced the new consolidated set of housing standards will be contained within an amended version of the Building Regulations. The standards would apply nationally and be mandatory for all new homes.

Building services equipment

7.31 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.

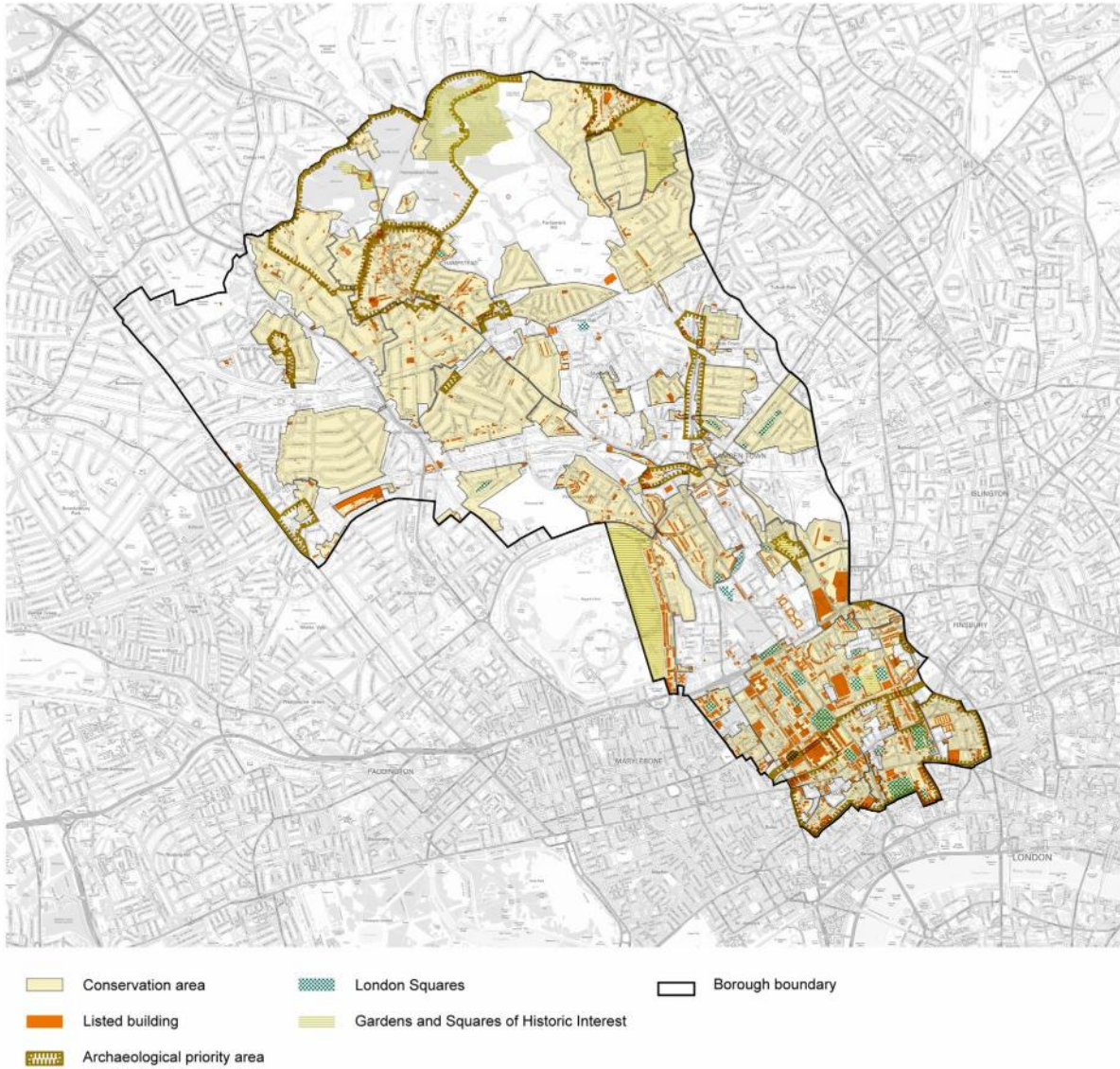
Tall buildings

7.32 While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order to not detract from the nature of surrounding places and the quality of life for living and working around them. Applications for tall buildings will be considered against Local Plan policies on design and heritage, along with the full range of policies, including those on mixed use, sustainability, amenity and microclimate. Effect on views and provision of communal and private amenity space will also be important considerations.

7.33 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 do 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. Tall building proposals in Camden will therefore merit detailed design assessments.

Heritage

Map 4: Heritage and Archaeological Sites



Camden's heritage

7.34 Camden has a rich architectural heritage with many special places and buildings from throughout Camden's history (see map 6). 39 areas, covering much of the borough, are designated as conservation areas, recognising their special architectural or historic interest and their character and appearance. We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission and conservation area consent in these areas.

7.35 Over 5,600 buildings and structures in Camden are nationally listed for their special historical or architectural interest and 53 of the borough's squares are protected by the London Squares Preservation Act 1931. In addition, 14 open spaces in Camden are on English Heritage's Register of Parks and Gardens of Special Historic Interest. The Council also maintains a local list of over 400 non-designated heritage assets. The Council has a responsibility to preserve and enhance our heritage of important areas and buildings. Camden also has a generally well-preserved archaeological heritage, with 13 identified archaeological priority areas, although this can be vulnerable to modern development and land use.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens.

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

- a. take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b. require that development within conservation areas preserves or enhances the character or appearance of the area;
- c. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless circumstances are shown that outweigh the case for retention;
- d. resist development outside of a conservation area that causes harm to the character or 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.

Development which causes harm to the significance of a conservation area will not be permitted unless there are public benefits to the development that outweigh that harm, taking into consideration the scale of the harm and the significance of the asset.

Listed Buildings

To preserve and enhance the borough's listed buildings, we will:

- f. prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- g. resist proposals for a change of use or alterations and extensions to a listed building where it considers this would cause harm to the special architectural and historic interest of the building; and
- h. resist development that it considers would cause harm to the setting of a listed building.

We will refuse permission for development which results in substantial harm to, or the loss of, a listed building unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:

- i. the nature of the heritage asset prevents all reasonable uses of the site; and
- j. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- k. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- l. the harm or loss is outweighed by the benefit of bringing the site back into use.

Archaeology

We 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 and on-designated heritage assets

We will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Parks and Gardens of Special Historic Interest, and London Squares.

Enhancing the historic environment

- 7.36 In line with the National Planning Policy Framework and National Planning Practice Guidance, The Council will seek to ensure that development not only avoids harm, but also improves the setting of the historic environment, or better reveals the significance of heritage assets.



Conservation Areas

- 7.37 In order to preserve or 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 or 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 or 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.

- 7.38 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.

Details

- 7.39 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.

Sustainable design and retrofitting

- 7.40 Historic buildings including those 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. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building. Applicants are encouraged to follow the detailed advice in Camden's Retrofitting Planning Guidance, the energy efficiency planning guidance for conservation areas, and the English Heritage website.

Use

- 7.41 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. Two uses of particular importance to the character of Conservation Areas are pubs and local shops, especially when they are located in historic buildings. The Council will protect these uses as set out in policy C3 - Public Houses and Chapter 9: Town Centres and shops.

Landscape

- 7.42 The value of existing gardens, trees and landscape to the character of the borough is described in policy A2 - Open Space, and they make a particular contribution to conservation areas. Development will not be permitted which causes the loss of trees or garden space where this is important to the character and appearance of a conservation area.

Demolition in conservation areas

- 7.43 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. The Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless 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 the National Planning Policy Framework, Camden's conservation area statements, appraisals and management plans and any other relevant supplementary guidance produced by the Council.
- 7.44 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.
- 7.45 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.

Listed buildings

- 7.46 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.
- 7.47 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 the National Planning Policy Framework.

7.48 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 the National Planning Policy Framework.

7.49 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.



Access in listed buildings

7.50 Where listed buildings and their approaches are being altered, disabled access should be considered and incorporated. The Council will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. 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.

Sustainability measures in listed buildings

- 7.51 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.

Archaeology

- 7.52 Camden has a rich archaeological heritage comprises 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
 - London Suburbs
 - St Pancras
 - Kentish Town
 - Battle Bridge
 - Hampstead
 - South End
 - West End
 - Kilburn
 - Belsize
 - Highgate
 - Baginigge Wells
 - Canalside Industry
- 7.53 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.
- 7.54 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.
- 7.55 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.

- 7.56 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 the National Planning Policy Framework.

Other heritage assets

- 7.57 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. The Council will consult with English Heritage over proposals affecting these parks and gardens. We also encourage the restoration and management of Parks and Gardens of Special Historic Interest and London Squares to enhance their value.



Non designated heritage assets

7.58

The borough also has many attractive, historic, locally significant buildings and features which contribute to the distinctiveness of local areas, but which are not formally designated. The National Planning Policy Framework identifies these features as non-designated heritage assets. Non-designated heritage assets may either be identified as part of the Planning process or on Camden's Local List. When planning permission is required for any proposal that directly or indirectly affects the significance of a non-designated heritage asset (either on the Local List or not) then the Council will treat the significance of that asset as a material consideration when determining the application. The Local List can be seen at www.camden.gov.uk/locallist.

Shopfronts

- 7.59 Shopfronts contribute greatly to the character of centres and their distinctiveness. Most of Camden's town and neighbourhood centres date back to the 19th Century and earlier, having developed from commercial activities that first took place within dwellings, although there are some significant 20th Century shopping parades.

Policy D3 Shopfronts

The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.

When considering proposals for shopfront development we will consider:

- a. the design of the shopfront or feature;
- b. the existing character, architectural and historic merit and design of the building and its shopfront;
- c. the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
- d. the general characteristics of shopfronts in the area;
- e. community safety and the contribution made by shopfronts to natural surveillance; and
- f. the degree of accessibility.

We will resist the removal of shop windows without a suitable replacement and will ensure that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.

Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character.

Protecting existing shopfronts

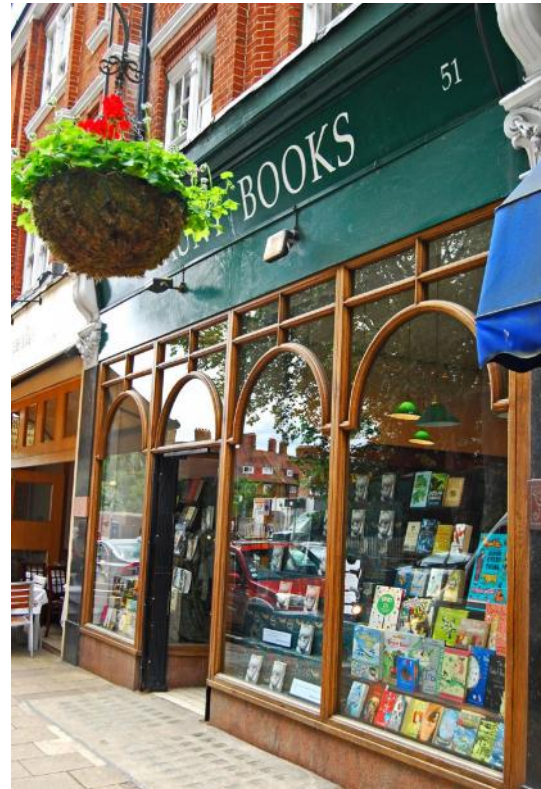
- 7.60 Shopfronts form an essential part of the character and attractiveness of many areas in Camden, in particular its centres, and contribute to the creation of vibrant streets and public spaces. We will seek to protect existing shopfronts that make a significant contribution to the appearance and feel of an area, for example through their architectural and historic merit. We will consider the need to keep the appearance of the shopfront, taking into account the quality of its design, its historic importance and its location. Good examples of shopfronts should be retained wherever possible.
- 7.61 A number of Camden's centres lie within conservation areas. The Council has prepared conservation area statements, appraisals and management plans for these which set out detailed information on the area and its character, and the Council's approach to their preservation and enhancement, including, where relevant, shopfronts.

Design of new shopfronts

- 7.62 The quality of shopfronts and the way in which they relate to their surroundings make an important contribution to the character and attractiveness of an area. The Council will therefore seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. Transparent shopfronts will be sought for units containing shops and other town centre uses, due to the contribution that they make to the vitality and attraction of centres.
- 7.63 The Council considers that the attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and neighbouring units and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance, retain a consistent building line and contribute to the character and attractiveness of the centre they are located in. As shopfronts are seen at close quarters, the detailing, quality of materials, execution and finishes are very important. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.

Replacement shopfronts

- 7.64 If a shopfront is replaced or altered, the design should respect the characteristics of the building and, where appropriate, shopfront windows and framework features, such as pilasters, fascias and console brackets, should be retained or restored. Careful consideration will be given to proposals for excavating or re-opening lightwells in front of shopfronts, particularly those in a group, as they can affect the cohesiveness of a frontage.
- 7.65 Folding or opening shopfronts will not generally be acceptable, as they can create a void at ground level that can harm the appearance of a building, and can also have a negative impact on local amenity, for example in terms of noise and disturbance.



Shop windows

- 7.66 Shop windows provide views into and from premises and can help bring activity and enhance feelings of security by providing natural surveillance. Displays in shop windows can add to the attractiveness of a premises and the vitality and attraction of the centre. Security features associated with shop window displays should be internal in order to avoid harming the appearance of shop premises and creating clutter. Solid shutters are only considered to be acceptable in exceptional cases as they are unsightly and can generate feelings of insecurity in those walking by, hide internal intruders and encourage graffiti.

- 7.67 As set out in policy C4 - Safety and Security, lighting from shop windows can help to increase security after dark. The Council may therefore seek the maintenance of some shopfront lighting overnight, where appropriate, particularly in areas identified as having high levels of crime. However, this lighting should be well-designed so it does not cause light pollution.
- 7.68 Camden Planning Guidance 1: Design supplementary document provides more detail on the Council's approach to the design of shopfronts.

Advertisements

- 7.69 This policy applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Information on what types of advertisements require consent is set out in Outdoor advertisements and signs: a guide for advertisers (Communities and Local Government, June 2007). Advertisements are controlled in respect to their effect on amenity and public safety. Further guidance on Camden's approach to advertisements is available in Camden Planning Guidance 1: Design supplementary document.

Policy D4 Advertisements

The Council will require advertisements to preserve and enhance the character of their setting and host building. Advertisements must respect the form, fabric, design, and scale of their setting and host building and be of the highest standard of design, material and detail.

We will support advertisements that:

- a. preserve the character and amenity of the area; and
- b. preserve or enhance heritage assets and conservation areas.

We will resist advertisements that:

- c. contribute to an unsightly proliferation of signage in the area;
- d. on shopfronts, are above fascia level or ground level, except in exceptional circumstances;
- e. contribute to street clutter in the public realm;
- f. cause light pollution to nearby residential properties or to wildlife habitats;
- g. have flashing illuminated elements; or
- h. impact upon public safety.

Shroud advertisements, banners, hoardings / billboards / large outdoor signboards are subject to further criteria as set out in Camden Planning Guidance 1: Design supplementary document.

Character and amenity

- 7.70 Advertisements and signs should be designed to be complimentary to and preserve the character of the host building and local area. The size, location, materials, details, and illumination of signs must be carefully considered. Interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment. The Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area.

Heritage and conservation areas

- 7.71 Advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation

area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.

Placement of advertisements on shopfronts

- 7.72 Generally shopfront advertisements will only be acceptable at the ground floor level, at fascia level or below. Fascia in this context refers to the signboard on the upper part of a shopfront showing the name of the shop. Advertisements above fascia level can appear visually obtrusive and unattractive and, where illuminated, they can cause light pollution to neighbouring residential properties.

Street furniture and the public realm

- 7.73 Street furniture includes objects placed on the street including traffic signs and signals, benches, street names, CCTV cameras, lighting, cycle parking, guardrails, bollards, and bus shelters. The Council aims to reduce visual street clutter reducing the number of objects on the street, rationalising their location, and limiting the palette of materials. Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.

Illumination and light pollution

- 7.74 Advertisements should not become unduly dominant in the street scene, cause light pollution that disturbs residents at night, cause light pollution to wildlife habitats, or cause safety hazards to drivers. To achieve these aims consideration should be given to the intensity of illumination, surface area to be illuminated, and the positioning and colours of advertisements. The type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon, etc.) should be determined by the design of the building. Illuminated signs should not be flashing or intermittent, whether internal or external.

Impact on safety

- 7.75 Advertisements will not be considered acceptable where they impact upon public safety, including when advertisements:
- obstruct or impair sight lines to road users at junctions and corners;
 - reduce the effectiveness of a traffic sign or signal;
 - result in glare and dazzle or distract road users;
 - distract road users because of their unusual nature;
 - disrupt the free flow of pedestrian movement; or
 - endanger pedestrians forcing them to step on to the road.

Discontinuance

- 7.76 The Council takes a proactive approach to preserving or enhancing the townscape and public realm. Where existing advertisements with deemed consent are considered to harm the character and amenity of a building or local area the Council will where appropriate seek removal of these advertisements which may include serving of discontinuance notices.

Estate agent boards

7.77

Estate agent boards of a certain number and size can be erected on properties without the benefit of advertisement consent. Areas may be exempted from this deemed consent under Regulation 7 of the 1992 Regulations. In these areas no boards will be granted advertisement consent by the Council because of their effect on visual amenity, except in exceptional circumstances. Please refer to the Camden website for the list of exempted areas.

8. Sustainability and climate change

Climate change mitigation

- 8.1 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies.
- 8.2 Green Action for Change: Camden's environmental sustainability plan (2011-2020) commits Camden to a 27% borough wide carbon dioxide (CO₂) reduction by 2017 and a 40% borough wide CO₂ reduction by 2020 (London carbon reduction target). Over 90% of Camden's CO₂ emissions are produced by the operation of buildings. Annual CO₂ emission data provided by Government (Department for Energy and Climate Change, 2014) consistently show that approximately 65% of Camden's CO₂ emissions stem from non-domestic buildings, with a further 25% generated by housing. The remaining 10% of Camden's emissions are caused by transport.
- 8.3 Any new development in Camden is likely to/has the potential to increase CO₂ emissions in the borough. If we are to achieve local and support national CO₂ reduction targets, it is crucial that planning policy limits CO₂ emissions from new development wherever possible and supports sensitive energy efficiency improvements to existing buildings.

Policy CC1 Climate change mitigation

The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

We will:

- a. require all development proposals of five or more dwellings and/or 500m sq of any floorspace to show in an energy statement how the energy hierarchy has been applied;
- b. ensure that the location of development and mix of land uses minimises the need to travel by car and help support local energy networks;
- c. support and encourage sensitive energy efficiency improvements to existing buildings; and
- d. ensure that developments maximise resource efficiency.

We will promote local energy generation by:

- e. working with our partners and developers to implement local energy networks in the parts of Camden most likely to support them;
- f. protecting existing local energy networks where possible (e.g. at Gower Street and Bloomsbury) and safeguarding potential network routes (e.g. Euston Road); and
- g. requiring all major developments to assess the feasibility of establishing a decentralised energy network or connecting to an existing network.

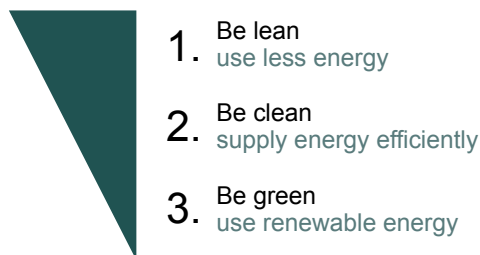
We will have regard to the cost of installing measures to tackle climate change as well as the cumulative future costs of delaying reductions in carbon dioxide emissions.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

- 8.4 The Council has commissioned two borough wide CO2 reduction studies to ensure that Local Planning policy appropriately responds to the carbon challenge. Our first study, Delivering a low carbon Camden, considered carbon reduction scenarios to 2050 to align with the long-term national 80% CO2 reduction target within the Climate Change Act 2008. Our later 2010 study focussed specifically on the challenges of achieving a CO2 reduction target of 40% by 2020.
- 8.5 Both studies concluded that meeting borough CO2 reduction targets depends on the growth of combined heat and power led decentralised energy networks; the extensive thermal improvement of existing housing stock; behaviour change; the significant deployment of appropriate renewable technologies; and the steady decarbonisation of the national electricity grid.

The energy hierarchy

- 8.6 New developments in Camden will be expected to be designed to minimise energy use and CO2 emissions in operation through the application of the “energy hierarchy”. The energy hierarchy is a sequence of steps that minimise the energy consumption of a building. Buildings designed in line with the energy hierarchy prioritise lower cost passive design measures, such as improved fabric performance over higher cost active systems such as renewable energy technologies.
- 8.7 The following diagram shows a simplified schematic of the energy hierarchy, which is explained further in planning guidance Camden Planning Guidance 3: Sustainability supplementary document.



Application of the energy hierarchy

- 8.8 Developments involving five or more dwellings and/or more than 500sqm of (gross internal) any floorspace will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All major developments will also be expected to demonstrate how relevant London Plan targets for CO2 reduction and how local requirements for CO2 reduction from decentralised and renewable energy have been met.
- 8.9 The energy statement should demonstrate how passive design measures including the development orientation, form, mass, and window sizes and positions have been taken into consideration to reduce energy demand, demonstrating that the minimum energy efficiency requirements required under

building regulations will be met and where possible exceeded. This is in line with stage one of the energy hierarchy 'Be lean'.

8.10 The Council will expect developments of five or more dwellings and/or more than 500sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO2 emissions of the development after all proposed energy efficiency measures have been incorporated.

8.11 Where it is demonstrated that the required reduction in carbon emissions cannot be met on site, the Council will require a financial contribution to an agreed borough wide programme to provide for local low carbon projects. The borough wide programme will be connected to key projects identified in the Council's Green Action for Change.

Sustainable patterns of development

8.12 The location of development and mix of land uses have a significant influence on the amount of energy we use for transport, as well as whether we can generate or supply local energy efficiently. We will make the most efficient use of Camden's limited land and steer growth and uses that will generate a large number of journeys to the most accessible parts of the borough. Development will be focussed in Camden's growth areas, with other highly accessible locations, such as Central London and most of our town centres, also considered suitable for development that significantly increases travel demand. Please also refer to policy G1.

Resource efficiency, demolition and retrofitting existing buildings

8.13 Given the significant contribution existing buildings make to Camden's CO2 emissions, the Council will support proposals that seek to sensitively improve their energy efficiency. Further guidance on how the energy performance of existing homes in conservation areas can be improved without harming the character and appearance of the area can be found in our supplementary planning documents ('Energy efficiency planning guidance for conservation areas' and 'Retrofitting planning guidance').

8.14 The construction processes and new materials employed in developing new 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. 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.

8.15 All proposals for demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either re-use materials on-site or salvage appropriate materials to enable their

re-use off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.

- 8.16 We will expect all developments, whether for refurbishment or redevelopment, to optimise resource efficiency through:
- reducing waste;
 - energy and water use during construction;
 - minimising materials required;
 - specification of materials with low embodied carbon content; and
 - enabling low energy and water demands once the building is in use.
- 8.17 Embodied carbon is the carbon impact associated with materials production, transport, assembly, use and disposal. This will include consideration of maintenance and repair but does not include the carbon emissions associated with the energy used for heating, lighting or cooling in the completed building. Additionally, we will expect developers to consider the service life of the building and possible future uses of the building to optimise resource efficiency. The durability and lifespan of the buildings components should be matched to its likely service life, and where appropriate the building should be designed to be flexible in terms of adaptation to future alternative uses in order to avoid the need for future demolition.
- 8.18 As part of the above assessment of resource efficiency, all developments involving five or more dwellings and/or more than 500sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development. Where such an assessment has been completed we would encourage that the results are logged on the WRAP embodied carbon database in order to contribute to the embodied carbon knowledge base.
- 8.19 Further guidance on resource efficiency and embodied carbon assessment can be found in Camden Planning Guidance 3: Sustainability supplementary document.

Local energy generation

- 8.20 Decentralised energy generate and supply electricity, heating or cooling close to where it is used and such local generation reduces transmission loses and lowers carbon emissions. Given the key role decentralised energy is expected to play in borough wide CO2 reduction, the Council shall expect new developments to play a pivotal role in their growth. Existing decentralised energy networks operate in Kings Cross, Bloomsbury and Gospel Oak.
- 8.21 The Council's borough wide Heat Demand and Heat Source Mapping (2014) identified that new decentralised energy networks negotiated through the Planning system are most likely to begin in, and expand out from King's Cross, Euston, Tottenham Court Road, West Hampstead and Holborn due to the expected scale and mix of development at these locations.
- 8.22 Combined Heat and Power (CHP) led decentralised energy networks typically involve a CHP led energy centre supplying heat and electricity to nearby buildings. Cooling can also be incorporated in such systems where there is appropriate demand. Within the context of the energy hierarchy gas fired networks are considered to sit within stage two on the energy hierarchy, 'Be clean'. However, it is important to note that there are serious air quality implications for the use of Combined Heat and Power (CHP) Plants and

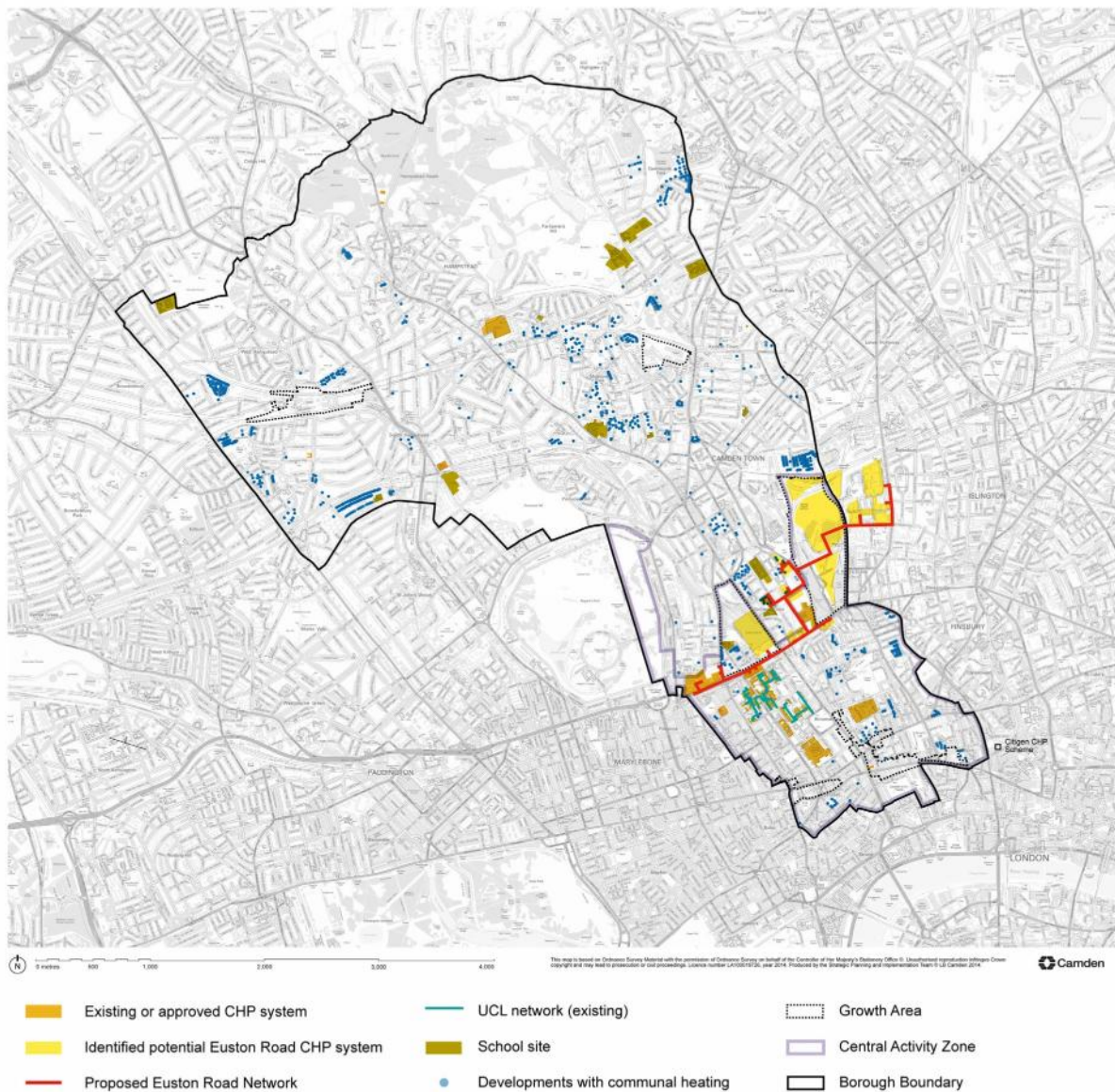
Biomass Boilers. The use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy and further information on this issue can be found in policy CC4.

8.23

New developments are considered to be the most effective catalysts for decentralised energy network growth. The Council will therefore require all new major developments to assess the feasibility of establishing new or connecting to existing or planned decentralised energy networks. Developments will be required to follow the steps below, in the order listed, to ensure energy from an efficient source is used where possible:

- where feasible, development will be required to connect immediately to existing networks;
- where networks do not currently exist, developments will be required to provide on-site infrastructure for connection to any planned future decentralised energy network in the vicinity of the site, having regard to opportunities identified on the map below and area specific energy plans and site allocations;
- major development proposals that cannot immediately connect to an existing heating or cooling network should evaluate the feasibility of combined heat and power (CHP) systems and, where appropriate, examine the feasibility of extending the system beyond the site boundary to establish a new network.

Map 5: Energy Networks



- 8.24 The Council will require all major developments within a 500m radius of a communally heated council housing estate to conduct a full feasibility study into the supply of heat to the estate. A further map outlining the 500m radius is contained within Camden Planning Guidance 3: Sustainability supplementary document.
- 8.25 The Council does not support the installation of stand-alone CHP units in small residential developments where there is neither the potential nor the intention for that development to form part of a wider network.

Monitoring

- 8.26 Energy performance software, used to predict energy performance and inform energy statements to support planning applications, is evolving but does however have limitations. The installation of monitoring equipment in all major developments will provide important information showing actual energy performance and will aid the Council and developers understanding of the effectiveness of measures implemented in the borough. Such data would also inform the Council as to whether policy requirements are being met. Monitoring shall include any renewable or low carbon technology that contributes to meeting London Plan policy 5.2.

Adapting to climate change

- 8.27 Climate change adaptation involves changing the way we do things to prepare for the potential effects of climate change. We need to ensure that buildings and people can adapt to changes already evident within the climatic system.
- 8.28 Adapting to a changing climate is identified in Camden's environmental sustainability plan, Green Action for Change (2011-2020), as one of the five key environmental issues and challenges for Camden. The three key risks which require adaptation measures are flooding, drought and overheating. Specific design measures and 'green infrastructure' such as green roofs, green walls and open spaces can help mitigate these risks.
- 8.29 Changes to our climate could also lead to:
- subsidence due to increased shrinking and expanding of Camden's clay base;
 - poorer air quality;
 - a hotter microclimate;
 - increased summer electricity use due to increased demand for cooling; and
 - threats to the quantity and quality of our water supply.
- 8.30 Such risks impact upon the health and well-being of Camden residents, has financial implications, and can have impacts upon whether plant and animal species thrive or decline. Ensuring new developments are designed to adapt to these risks and minimise the contribution they make are priorities for the borough.

Policy CC2 Adapting to climate change

The Council will require development to be resilient to climate change.

We will ensure that schemes include appropriate climate change adaptation measures, such as:

- a. protecting existing green spaces and promoting new appropriate green infrastructure;
- b. not increasing and wherever possible reducing surface water run-off;
- c. incorporate green roofs, combination green and blue roofs and green walls where appropriate; and
- d. measures to reduce the impact of urban and dwelling overheating.

Sustainable design and construction

We will promote and measure sustainable design and construction by:

- e. ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
- f. expecting new build housing to meet Code for Sustainable Homes Level 4 and Code Level 6 (zero carbon) by 2016 or future replacement standards;
- g. expecting developments (conversions/extensions) of 500sqm of residential floorspace or above or five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment; and
- h. expecting non-domestic developments of 500sqm of floorspace or above to achieve "excellent" in BREEAM assessments from 2016 and encouraging zero carbon in new development from 2019.

The Council will have regard to the cost of installing these measures as well as the cumulative future costs of delaying them.

Climate change adaptation measures

- 8.31 To minimise the risks connected with climate change we will expect the design of developments to consider anticipated changes to the climate.

Green spaces

- 8.32 Camden is fortunate to have Hampstead Heath, Primrose Hill and Regent's Park which collectively help to temper the urban over-heating in the north of Camden and provide cool space in hot weather. To the south of the Euston Road there is less green space available. Throughout Camden we shall continue to protect our open and green spaces and where possible seek to create additional open spaces. Please see policy A2 for further information on Camden's green spaces.
- 8.33 As well as limiting the urban over-heating, green spaces help to slow the passage of rainwater to Camden's drainage network, which in turn reduces the risk of surface water flooding during intense rainfall events. The Planting of trees as part of new developments is encouraged but species selection and location will need to be carefully considered to avoid risks of subsidence, drying out the soil or excessive maintenance.

Green roofs and walls

- 8.34 To support a sustainable approach to urban drainage we shall require all new developments to install green roofs and introduce permeable landscaping where appropriate. We shall also expect new developments to consider the installation of green walls and combination green and blue roofs in appropriate locations. Further information on green roofs and walls can be found in Camden Planning Guidance 6: Amenity supplementary document.
- 8.35 As well as playing a vital role in slowing the speed at which rainwater enters the drainage network, green roofs provide valuable habitats which promote biodiversity, cool the local micro-climate and can provide visual amenity. Green roof specifications should be tailored to realise the benefits most suitable for the site and should consider appropriate drought resistant planting to ensure that they can survive hot summers with minimal maintenance.

Overheating

- 8.36 The Council will discourage the use of air conditioning and excessive mechanical plant. In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local micro-climate hotter. Where the use of this equipment is considered acceptable by the Council, for example where sterile internal air is required, we will expect developments to provide an appropriate level of mitigation towards cooling the local environment. Cooling measures could be passive or active, such as introducing planting in the public realm, green walls and roofs or other measures as recommended in the Mayor's Sustainable Construction and Design Supplementary Planning Guidance.

- 8.37 Trees grown near buildings to mitigate the heat effect are best placed to the west, south-west or south of buildings with small leafed species likely to offer the greatest impact. Green spaces and wider green infrastructure should be a minimum of 0.5ha in order to achieve cooling at significant distances beyond site boundaries (Forestry Commission, Air temperature regulation by urban trees and green infrastructure, 2013).
- 8.38 To help reduce the need for air conditioning, all new developments and developments that require a need for cooling will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design.

Cooling hierarchy

- Minimise internal heat generation through energy efficient design
- Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls
- Manage the heat within the building through exposed internal thermal mass and high ceilings
- Passive ventilation
- Mechanical ventilation



Sustainable design and construction measures

- 8.39 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 from the start of the design process and include these in their Design and Access Statement or separate document. Developments of five or more dwellings or 500sqm of any floorspace should address sustainable development principles in their Energy Statement.

- 8.40 BREEAM (Building Research Establishment Environmental Assessment Method) applies to non-residential developments and residential development arising from conversions and changes of use. This assessment method enables us to assess the environmental sustainability of a development.
- 8.41 BREEAM and BREEAM domestic refurbishment contains the following categories: 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. We have been successfully applying sub-targets, which we developed in consultation with the Building Research Establishment 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 and can be found in Camden Planning Guidance 3: Sustainability supplementary document.
- 8.42 We have been successfully applying a minimum of Very Good BREEAM domestic refurbishment. We will expect developments of five or more dwellings or 500sqm of residential floorspace or above (including conversions, extensions and changes of use) to achieve an excellent rating in BREEAM domestic refurbishment.
- 8.43 Non-residential developments of 500sqm or more shall achieve a BREEAM rating of excellent from 2016 and will encourage zero carbon from 2019.
- 8.44 We have successfully been applying a minimum standard of Level 4 for the Code for Sustainable Homes. For new build housing we will continue to require developments to achieve Code Level 4 for Sustainable Homes and encourage improvements in environmental sustainable performance in line with the Governments timetable towards zero carbon. From 2016 we will expect new residential developments to achieve Code Level 6 for Sustainable Homes.
- 8.45 The largest group of credits in the Energy category does not consider the energy efficiency of the initial design. To ensure that developments firstly incorporate energy efficient design, we will encourage schemes to adopt appropriate energy efficiency principles. The Council will strongly encourage schemes to meet Passivhaus standards. Further details on energy efficient design and principles and Passivhaus are set out in Camden Planning Guidance 3: Sustainability supplementary document.

Government consultations that could alter our approach

Housing Standards Review

- 8.46 This review considered all the standards that are currently applied to home building through the Planning process (energy, water, access, dwelling size, security, waste) and presented a number of options in a consultation document in 2013. A follow up consultation document published September 2014 'Housing Standards Review -Technical Consultation' sought views on new standards for dwelling size, water efficiency, Lifetime Homes/access, security, waste) – it is proposed to bring in these standards Autumn 2015.
- 8.47 The following standards are relevant to this section of the Local Plan:

- 8.48 Code for Sustainable Homes: consolidation of requirements into Building Regulations, which will mean that the Council will not be able to request Code Levels for future new housing development.
- 8.49 Water efficiency: there will be an optional tighter standard of 110 litres/person/day (lpd), in areas of specific water stress. As stated in policy CC3, Camden is located in an area of serious water stress and would expect to opt for higher standards for water efficiency.
- 8.50 The government has re-affirmed its commitment to achieve zero carbon homes from 2016 to be achieved by strengthening Part L of the building regulations and the delivery of allowable solutions (allowable solutions is a mechanism to allow developers to pay a contribution towards carbon reduction measures if they cannot achieve zero carbon on-site).
- 8.51 As a result of the above, parts of the sustainability policies may have to be amended to avoid a conflicting approach.

Sustainable Urban Drainage Systems

- 8.52 Government consultation 'Delivering Sustainable Drainage Systems (SUDS)' (September 2014) sets out an approach for implementing sustainable drainage systems and mechanisms for ensuring their long-term maintenance, instead of the previously proposed SUDS Approval Body.

Water and flooding

- 8.53 Our built environment plays a significant role in the way water is consumed, distributed and disposed of. The way water is used in a building and the pollutants it picks up running across a site affect the quality of the water that reaches our combined storm water and sewer system. In addition, the location of a development, and any flood mitigation measures used, can have an impact on local and downstream surface water flooding. Since 2010, Camden has been a lead Local Flood Authority, which means we have responsibility for managing flood risk from surface water and groundwater in the borough.
- 8.54 Following the incorporation of the reaches of the Rivers Fleet, Tyburn, Kilburn and Brent into the sewer network there are no main rivers in Camden and therefore the borough is located entirely in Flood Zone 1. This means that Camden is not at risk from river flooding (Flood Zones 2 and 3), but there are identified Local Flood Risk Zones (LFRZs) and Critical Drainage Areas (CDA) in the borough. Further information on these is set out in the Council's Surface Water Management Plan and Strategic Flood Risk Assessment (SFRA). Identified areas at risk of flooding in Camden are shown on Map 6.
- 8.55 Camden experienced significant flooding in 1975 and 2002 and the probability of such events recurring is likely to increase as a result of climate change. As noted in policy CC2 - Adapting to climate change, flooding and drought are key risks which require mitigation and adaptation measures in the borough. Changes to our climate can also threaten the quantity and quality of our water supply. Such risks impact upon the health and well-being of Camden residents. The floods in 2012 caused over £1 million of damage, not including individual costs to residents.

Policy CC3 Water and flooding

The Council will require developments to mitigate against flooding, be adaptable and reduce their water consumption.

We will ensure that development:

- a. considers the impact of development on Local Flood Risk Zones (including drainage);
- b. does not locate vulnerable development (such as basements dwellings) in flood-prone areas;
- c. achieves a greenfield run-off rate or, where this is not possible, achieve run-off rates that do not exceed those predevelopment;
- d. incorporates water efficiency measures; and
- e. avoids harm to the water environment and water quality.

Development should not increase flood risk and should reduce the risk of flooding where possible. Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

Minimising flood risk

- 8.56 Camden's Flood Risk Management Strategy and the SFRA have identified that surface water is not the only form of flooding risk that can result from new developments. Groundwater flooding also occurs in Camden and takes two principal forms. The first is aquifer based groundwater flooding, which occurs when the water table rises due to prolonged heavy rain. This is relatively rare in Camden as most of the borough is under London clay, but it is possible in areas around Hampstead Heath and in the very south of the borough. More common is 'perched' groundwater whereby water becomes lodged between the top layer and the impermeable London clay layer. The risk of this type of flooding is hard to model but has been recorded in parts of the borough, notably Kilburn, Fortune Green and West Hampstead, and will need to be considered and mitigated against in any new development.

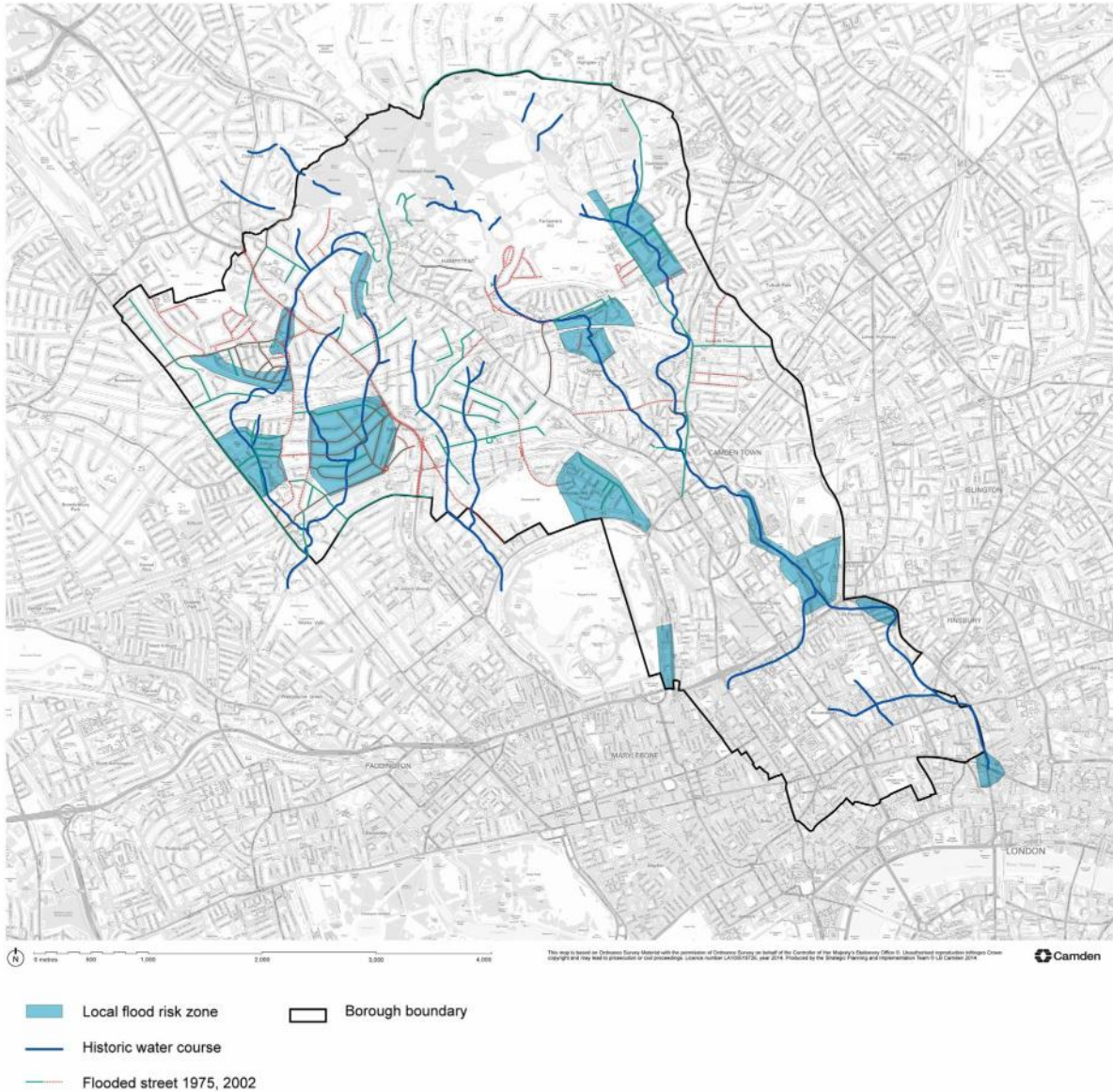


Site specific Flood Risk Assessments

- 8.57 Flood Risk Assessments (FRA) are carried out to identify the main flood risks to a development site, whether a development will increase flood risk, and recommendations for mitigating measures to reduce the impact of flooding at the site and surrounding area.
- 8.58 The Council will require Flood Risk Assessments for:
- all sites of 1 hectare or greater;
 - all development (including minor development and changes of use) located in a Local Flood Risk Zone within a Critical Drainage Area; and
 - all basement development on streets identified as being at flood risk or in an area where historic underground watercourses are known to have been present.
- 8.59 Where an FRA outlines mitigating measures are required to make a development acceptable, the Council will secure these by planning condition.

8.60 All Local Flood Risk Zones identified in the Map 6 are located within a Critical Drainage Area. Development located within Local Flood Risk Zones should not place additional pressure on the existing drainage infrastructure.

Map 6: Flood Risk



8.61 Basement dwellings and other ‘highly vulnerable’ development (as defined by the NPPF and associated guidance) is discouraged in areas where high surface water flood risk has been identified (please see Camden’s SFRA and current surface water flooding maps on the Environment Agency’s website).

8.62 Development can have an impact on the water environment beyond the site where it takes place by altering the flow of water both above and below ground and changing where water is absorbed or rises to the surface. Changing water movements can alter soil conditions in the wider area. Basements also affect the ability of the ground to absorb rain when soil is replaced by an impervious

structure and can be particularly susceptible to flooding, in such cases the use of basements may be restricted to non-habitable uses. The Council shall require all new basement developments whether domestic or non-domestic to conduct a Basement Impact Assessment which considers both groundwater and surface water flooding. A Basement Impact Assessment (BIA) should demonstrate that the impacts of the proposed development are acceptable, or that appropriate mitigation measures will be adopted.

Mitigating flood risk

- 8.63 By decreasing the amount of permeable surfaces into which rainwater can be absorbed and by changing the direction of surface water flows, new development can increase stress on the drainage network and increase risk of flooding to properties downstream which were not previously at risk.
- 8.64 As per national planning policy and the London Plan, the Council will expect developments to achieve greenfield run-off rates, and where this is not possible, run-off rates post-development should not exceed those predevelopment. A greenfield run-off rate is one that reflects the natural rate of water run-off from a site before it was developed. To reduce surface water run-off and the strain on the combined sewer network we will expect development in Local Flood Risk Zones to achieve reductions in surface water run-off rates post-development of 50% or to achieve greenfield run-off rates (whichever makes the most contribution towards reducing run-off rates).
- 8.65 The use of Sustainable Urban Drainage Systems (SUDS) will be encouraged in all basement developments that extend beyond the profile of the original building. For basements that consume more than 50% of the garden space, and are considered otherwise to be acceptable, the use of SUDS will be required to mitigate any harm to the water environment.
- 8.66 A drainage report should be submitted with all major applications and, in some cases basement developments. This should include:
- identification of flood risk;
 - assessment of existing run-off rates;
 - identification of measures to reduce run-off rates; and
 - calculation of proposed run-off rates.
- 8.67 Camden's Strategic Flood Risk Assessment includes information as to the suitability of SUDS in the borough and this should be used alongside other local information held by Camden and the Environment Agency. Where appropriate, SUDS measures will be secured by planning condition or by legal agreement.
- 8.68 The Council will therefore expect developments to demonstrate not only how flood risk to the development has been reduced through the use of SUDS, including green and brown roofs, permeable landscaping and retention ponds or tanks, but also how it will mitigate the potential flooding of other properties. When determining the suitability of SUDS, vulnerability and the importance of local ecological resources, such as water quality and biodiversity should be considered. All major developments should refer to the Council's SFRA to determine the likely contribution the development will make to flood risk.

Water efficiency

- 8.69 London has lower rainfall than the national average while having a very high population density. This combination of limited water resources and high demand has resulted in London being declared an area of serious water stress and this trend is likely to be exacerbated by climate change. The Council will protect the boroughs existing water infrastructure to ensure there is adequate supply, storage and foul water capability.
- 8.70 Developments must therefore be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water use on-site.
- 8.71 Major developments and high or intense water use developments, such as hotels, hostels and student housing, should include a grey water harvesting system. Where such a system is not feasible or practical, developers must demonstrate to the Council's satisfaction that this is the case. We will assess the performance of water-saving measures against the Water category in BREEAM/ refurbishment and the Code for Sustainable Homes assessments or new national standards for housing.

Regents Canal

- 8.72 The Regent's Canal (which is a branch of the Grand Union Canal) runs through the centre of the borough. The Canal forms part of London's Blue Ribbon Network, which has its own set of policies within the London Plan. Please refer to policy A2 for further information on the value of Regent's Canal in Camden.
- 8.73 The quality of the Regents Canal is of 'moderate' status and is failing to reach 'good' due to a failure to implement mitigation measures. The Council will have regard to the Thames River Basin Management Plan which contains the actions needed to tackle the main issues of the water environment.

Government consultations that could alter our approach

- 8.74 Housing Standards Review
- This review considered all the standards that are currently applied to home building through the Planning process and presented a number of options in a consultation document in 2013. Regarding water efficiency, there appear likely be an optional tighter standard of 110 litres/person/day (lpd) in areas of specific water stress. Camden is located in an area of serious water stress and would therefore expect to opt for higher standards for water efficiency.
- 8.75 Sustainable Urban Drainage Systems
- Government consultation 'Delivering Sustainable Drainage Systems' (SUDS) (September 2014) sets out an approach for implementing sustainable drainage systems and mechanisms for ensuring their long-term maintenance, instead of the previously proposed SUDS Approval Body.

Air quality

- 8.76 Improving local air quality, mitigating against the impact of development on air quality and ensuring that the exposure of poor air quality to new development is reduced in the borough is vital in safeguarding public health and the environment. The focus of this policy is to mitigate the impact of development on air quality and ensuring exposure to poor air quality is reduced in the borough.
- 8.77 It is recognised that parts of Camden have some of the poorest air quality levels in London and since 2000 the whole of the borough has been declared an Air Quality Management Area (AQMA) for both NO₂ (Nitrogen Dioxide) and PM₁₀ (particulate matter). Air pollution is associated with a number of adverse health impacts, and air pollution particularly affects the most vulnerable in society, in particular the young and the elderly. Camden is also working to assess and address PM_{2.5} (the smallest fraction of particulate), because research suggests that particulates of this size have the worst health impacts.
- 8.78 Levels of poor air quality is a longstanding problem that cause disadvantage and contribute to health inequality gaps in certain parts of the borough. Long-term exposure to these pollutants is linked to cancer, heart disease, reduced lung function and respiratory disease. Monitoring shows that from 2007, Camden continually fails to meet National and EU objective levels of NO₂. The Council's Joint Strategic Needs Assessment (JSNA) states that the issue is particularly serious in Camden where the percentage of mortality attributable to long-term exposure to PM_{2.5} is 7.7%.
- 8.79 The Council has produced an Air Quality Action Plan that identifies actions and mitigating measures necessary to improve air quality in the borough. A key challenge therefore is to make our local environment better by reducing air pollution. This Plan actively supports the reduction of poor air quality in Camden by:
- requiring all new development in the borough to be 'car-free' (see policy T2);
 - maintaining and increasing green infrastructure (see policy A2);
 - reducing emissions associated with new development (see policy CC1); and
 - supporting and encouraging sensitive energy efficiency improvements to existing buildings (see policy CC1).

Policy CC4 Air quality

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of a development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless mitigation measures are adopted to reduce the impact to acceptable levels. Similarly, developments in locations of poor air quality will not be acceptable unless designed to mitigate the impact to within acceptable limits.

Development which involves significant demolition, construction or earthworks will also be required to assess the risk of impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

The Council will only grant planning permission for development in Camden's Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated.

Exposure to air pollution

- 8.80 Developments close to busy roads, near diesel railway lines, or in areas of very high background air pollution (such as Central London) are likely to expose residents to high levels of air pollution and will require Air Quality Assessments (AQA). We will require Air Quality Assessments where one or more of the below apply:
- major applications where occupants will be exposed to poor air quality (along a busy road, diesel railway lines or in a generally congested area);
 - development that has potential to significantly change road traffic on a busy road;
 - the development has more than 75 new residences;
 - commercial developments with a floorspace of 2,500 sqm or more;
 - developments that include biomass boilers or CHP (combined heat and power); and
 - substantial earthworks or demolition.
- 8.81 An Air Quality Assessment must outline the predicted and forecast pollutant concentrations at the proposed development and the Planned mitigations. Where an AQA shows that a development would cause harm to air quality, planning permission will be refused unless mitigation measures are adopted to reduce the impact to acceptable levels. Mitigation measures would be secured either by planning condition or legal agreement where appropriate. Measures that can be taken to reduce the exposure to air pollution are contained in Camden Planning Guidance 6: Amenity supplementary document.

Effect of development on air quality

- 8.82 A development can affect air quality in three significant ways:
- the emissions from construction;
 - the emissions from the combustion of fuel for energy within the building; and
 - the emissions from transport to and from the building.
- 8.83 Any development which involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to Institute of Air Quality Management Dust Guidance. Mitigation measures appropriate to the risk should be included in the Construction Management Plan. All high risk sites must include real time construction dust monitoring and all medium risk sites to include monitoring where considered necessary.
- 8.84 In order to help reduce air pollution and adhere to regional planning policy, developments must demonstrate that they comply with the 'Air Quality Neutral' policy outlined in the GLA Sustainable Design and Construction SPG.

8.85 In Central London, one of the most significant sources of air pollution is domestic and commercial boilers, which are a key source of NO₂ (around 40%) and a small source of PM₁₀. This can be reduced through energy efficiency and by ensuring new boilers are Ultra Low Nitrogen Oxide (NO_x) (<40 mg/kWh). There are serious air quality implications for the use of Combined Heat and Power (CHP) Plants and Biomass Boilers. Consequently 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. CHP will only be accepted if it shown to be the most appropriate choice, it must also be of the highest standard in terms of NO_x emissions and it must adhere to the latest emissions standards contained in the Mayor's Supplementary Planning Guidance 'Sustainable Design and Construction'. An AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that its impact on nearby receptors is minimal.

Vehicle pollutants

8.86 Vehicles are a major source of both PM₁₀ and NO₂ in Camden and AQAs will be required when a development will significantly increase traffic volumes, congestion, parking or the number of HGVs in the locality. Camden is a 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.

Waste

- 8.87 The amount of waste we produce is increasing and the traditional ways of dealing with it (for example, exporting it to landfill sites outside London) are becoming increasingly unacceptable, financially and environmentally. Therefore, we need to find better ways of dealing with our waste and taking more responsibility for dealing with it within London. One of the aims of London Plan is to see London manage the equivalent amount of local authority collected waste (LACW) and commercial and industrial (CandI) waste it produces by 2026. This could be achieved by reducing the amount of waste we produce, increasing the re-use and recycling of materials, reducing the proportion of waste exported out from London and finding sites for new waste facilities.
- 8.88 We also face specific challenges in dealing with waste in Camden. For example, the borough's ability to be self-sufficient in waste is limited by its built-up character and the lack of sites on which to build waste management facilities. Also, the nature of Camden's housing stock, with a large proportion of flats and a significant number of homes without gardens, means that some homes have limited space for storing recycling containers and reduced opportunities for composting.
- 8.89 The Council recognises that Camden cannot adequately deal with its waste in isolation. Therefore, it is a member of the North London Waste Authority, which is responsible for the disposal of waste collected in the boroughs of Barnet, Camden, Enfield, Haringey, Hackney, Islington and Waltham Forest and is working in partnership with these authorities in order to prepare a joint North London Waste Plan (NLWP).

Policy CC5 Waste

The Council will seek to make Camden a low waste borough.

We will:

- a. aim to reduce the amount of waste produced in the borough and increase recycling and the re-use of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;
 - b. deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;
 - c. safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and
 - d. make sure that developments include facilities for the storage and collection of waste and recycling.
-

Waste production and recycling

- 8.90 The Council is committed to reducing the amount of waste produced in the borough, encouraging recycling and managing collected waste in a sustainable way. It fully supports the objectives of sustainable waste management to move the management of waste up the 'waste hierarchy' of prevention, preparing for reuse, recycling, other recovery, and to only consider disposal as a last resort.
- 8.91 We believe that communities should take more responsibility for their own waste and we will work to meet national and London-wide targets for waste and recycling. The London Plan expects Camden to manage 152,000 tonnes of waste in 2021, and 186,000 tonnes in 2031. However, we are pooling our waste with our partner boroughs in North London and working on joint solutions to the area's waste. The North London boroughs are together expected to deal with a total of 1,211,000 tonnes of waste in 2021, rising to 1,479,000 tonnes in 2031.
- 8.92 Camden will seek to increase recycling/composting in the borough to meet the London Plan target of 50% of household waste recycled by 2020 and 60% by 2031. Recycling in the borough has been increasing and over 30% of household waste was recycled in 2012/13, up from 16% in 2002/3. We have a number of schemes to encourage more recycling, including mini recycling centres, the reuse and recycling centre at Regis Road, and a weekly door-to-door recycling collection service. Green Action for Change, Camden's Environmental Sustainability Plan (2011-2020), aims to reduce the amount of waste we produce in coming years and increase the amount we recycle. It contains our overall objectives for managing Camden's waste and sets out what we are doing to encourage recycling and waste reduction and provide recycling facilities and waste collection services.



Waste partnership

- 8.93 The North London Waste Authority (NLWA) and the seven boroughs have prepared a Joint Waste Strategy, which plans for managing the waste collected by the boroughs until 2020. This will be used to facilitate the provision of new waste management services, to increase recycling and recovery and divert more waste away from disposal to landfill.
- 8.94 In their role as planning authorities, the boroughs are preparing a joint planning document - the North London Waste Plan (NLWP) - which will form part of borough Local Plans. It will identify appropriate locations, including existing sites, for a range of waste facilities to meet the waste management needs of North London and will aim to ensure that benefits are maximised and the negative

aspects minimised. In line with London Plan policy 5.17, the North London Waste Plan will identify sites to deal with the management of local authority collected waste and commercial and industrial waste. In addition, the NLWP will plan for construction, demolition and excavation waste; hazardous waste and agricultural waste. It will also contain some detailed policies to ensure that proposals for waste facilities will be dealt with consistently across the North London area.

- 8.95 Camden currently only has one waste site - the recycling and re-use centre at Regis Road - and will continue to safeguard it for waste use. The change of use or redevelopment of this site will only be permitted if a suitable compensatory waste site is provided that replaces the facilities and services available at Regis Road. The proposed site will be expected to normally meet the maximum achievable throughput of the Regis Road site (see London Plan policy 5.17).

Facilities for storage and collection

- 8.96 To make sure that residents and businesses can properly store and sort their waste and to make household recycling as easy as possible, the Council will require developments to provide adequate facilities for recycling and the storage and disposal of waste. Facilities for home composting will be encouraged in appropriate development schemes. We will also seek to secure the re-use of construction waste on development sites to reduce resource use and the need to transport materials. Camden Planning Guidance 1: Design supplementary document contains further information on the Council's expectations for on-site facilities for waste and recycling and on construction waste.

Waste Management Plan

- 8.97 To ensure an integrated approach to waste management and the highest possible re-use and recycling rates, the Council will encourage the submission of a site waste management plan prior to construction. For further details please refer to Camden Planning Guidance 3: Sustainability supplementary document.

9. Town centres and shops

Quantity and location of retail development

- 9.1 Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services.
- 9.2 Traditional high street style centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping, and competition from out of centre retail development. However Camden's centres also have strengths in terms of their location, accessibility by public transport, walking and cycling, character, and offer (including many independent and specialist shops).
- 9.3 In line with the National Planning Policy Framework, the Council will take a sequential approach when assessing proposals for new town centre uses ensuring that such development takes place in appropriate locations, having regard to the distribution of future retail growth and the hierarchy of centres established this policy.
- 9.4 The development of new shops or other town centre uses, particularly when they are large in scale, can have an impact on other centres. In line with government guidance in the National Planning Policy Framework, the Council will seek to protect the vibrancy and vitality of its centres by assessing the impact of proposed town centre uses on Camden's centres.
- 9.5 Refer to Policy G1 - Location and Management of Growth for further detail. Further guidance on assessing impact and information on relevant matters to be addressed in Retail Impact Assessments is set out in the National Planning Policy Framework and the accompanying guidance.

Camden Centres

Growth areas

- King's Cross / St Pancras;
- Euston;
- Tottenham Court Road; and
- West Hampstead Interchange (note: No additional retail or other town centre uses are anticipated at West Hampstead Interchange Growth Area).

Town Centres

- Camden Town;
- Kilburn High Road;
- Finchley Road / Swiss Cottage;
- Kentish Town;
- West Hampstead; and
- Hampstead.

Central London Frontages

- Tottenham Court Road / Charing Cross Road / New Oxford Street;
- High Holborn / Kingsway; and
- King's Cross.

Neighbourhood Centres

- Camden has 37 Neighbourhood Centres, which are identified in Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document.

The boundaries of the centres are set out on the Policies Map.

The borough's growth areas and town centres are shown on Map 1.

Policy TC1 Quantity and location of retail development

The Council will focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations.

Retail and other town centre uses in the borough will be provided as follows:

- a. significant development in the King's Cross / St Pancras Growth Area, with approximately 30,000 sqm net additional retail (A1 to A5 use classes) floorspace anticipated;
- b. significant development at the Euston Growth Area, with approximately 16,450 sqm of net additional retail (A1 to A5 use classes) floorspace anticipated;
- c. significant additional retail in the Tottenham Court Road Central London Frontage and Camden Town Town Centre.

This retail floorspace is expected to be supported by a range of other town centres uses, including food, drink, and entertainment uses. The Council will apply a sequential approach to further retail and town centre development as described below.

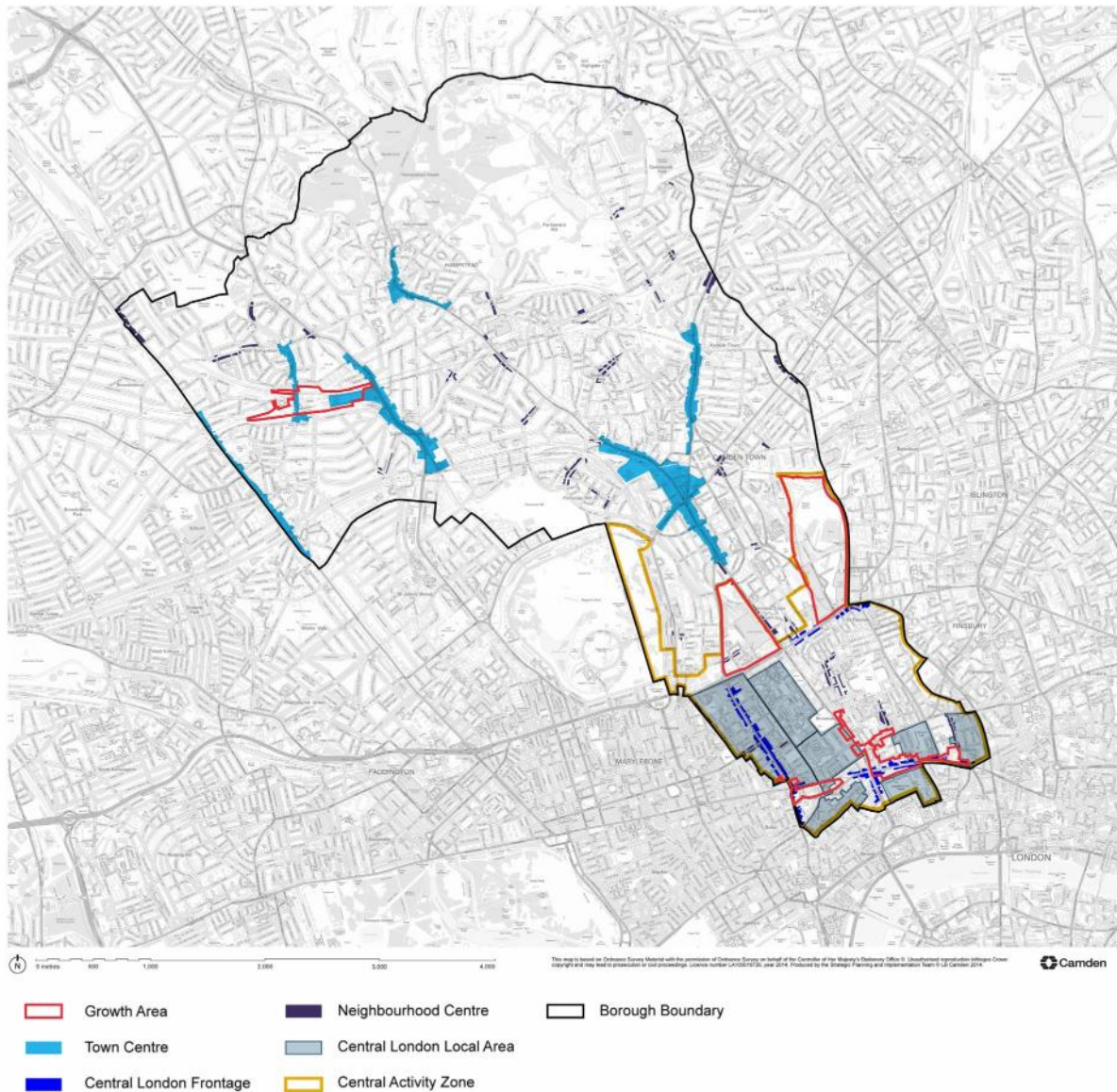
Sequential Approach

We will apply a sequential approach to retail and other town centre uses to support its network of centres. Retail and other town centre uses should be located in centres according to the hierarchy below. Only if suitable sites cannot be found within centres will the Council consider edge of centre locations or if no edge of centre location are available, out of centre locations.

We will:

- d. promote the additional development of retail and other town centre uses in Central London Frontages and Town Centres;
 - e. support appropriate provision in Neighbourhood Centres and Camden's Specialist Shopping Areas: Covent Garden, Hatton Garden, Museum Street, Drummond Street and Denmark Street; and
 - f. support limited provision in small shops outside centres to meet local needs.
-

Map Camden's Centres



- 9.6 The Council will require an impact assessment for large retail development proposals (of 2,500sqm or more) that are not in accordance with the approach in policy and:
- would be in an edge of centre or out of centre location; or
 - would be in an existing centre and have the potential to have a harmful impact on other centres.
- 9.7 The growth area of King's Cross will provide the major focus for new shop provision in Camden. The King's Cross Central redevelopment will include shops, services and facilities of a scale similar to a town centre to meet the needs of the large numbers of people who will be living in, working in, or visiting the area. Planning permission has been granted for 45,000 sqm of retail, food and drink

floorspace (in A use classes). This will be spread throughout the site and will open in phases. Approximately 30,000 sqm of this is yet to be built out.

- 9.8 The Camden Retail and Town Centre Study 2013 indicates a need for around 30,000sq m of new retail floorspace in the borough by 2031, in addition to that to be provided at King's Cross and St Pancras.
- 9.9 There is opportunity to deliver a significant amount of additional retail floorspace as part of the redevelopment of Euston Station. The Euston Area Plan anticipates that around 20,000 sqm of class A1 to A5 uses could be provided at Euston both around and within the station. This figure comprises 16,450 sqm of net growth and reprovion of around 3,550 sqm of retail to meet demand from current passenger numbers. Approximately 8,000 sqm of this could be in A1 retail use.
- 9.10 The precise quantum and type of retail to be provided will be subject to detailed site specific assessments, and an assessment of any impacts on other centres.

Protecting and enhancing Camden's centres and other shopping areas

- 9.11 The Council will ensure that development in its centres is appropriate to the character and role of the centre in which it is located, and does not cause harm to neighbours, the local area, or other centres.



Permitted development rights

- 9.12 The Council seeks to protect the vitality and viability of its centres through application of the retail policies and through the control of shopping and other town centre uses on protected frontages. Under permitted development rights planning permission is not required for many changes of use between retail and other town centre uses. Permitted development rights have recently been expanded and there are plans for further deregulation. Recent changes include the right to change from shops to residential uses in certain circumstances and the right for a temporary change of use between a number of uses including shops, cafes, restaurants, and offices for up to two years. These rights may be further expanded in future to widen the A1 shop use class to include other town centre uses (including banks and building societies) and to include the right to change A1 shops to a restaurant or cafe in class A3, or a D2 leisure use.
- 9.13 Recent changes include the right for a temporary change of use between a number of town centre uses (including shops, cafes/restaurants, office) for up to two years, and the right to change from shops to residential uses in certain circumstances. These rights may be further expanded in future to widen the A1 shop use class to include other town centre uses (including banks and building

societies) and to include a permitted development rights to allow A1 shops to change to a restaurant or cafe in planning class A3, or a D2 leisure use.

Policy TC2 Protecting and enhancing Camden's centres and other shopping areas

The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors.

We will:

- a. seek to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;
- b. provide for, and maintaining, a range of shops including independent shops, services, food, drink, and entertainment and other suitable uses to provide variety, vibrancy and choice;
- c. make sure that food, drink, entertainment, and other town centre uses do not have a harmful impact on residents and the local area, and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres (Refer to Policy TC4 Food, drink, entertainment, and other town centres uses);
- d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops; and
- e. pursue the individual planning objectives for each centre, as set out in Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document, and through the delivery of environmental, design, transport and public safety measures.

The Council has designated primary and secondary frontages in its centres, which are shown on the Policies Map. We will:

- f. protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre;
- g. protect the secondary frontages as locations for a range of other town centre uses including A1 shops to create centres with a wide range of shops, services, and food, drink, and entertainment uses which support the viability and vitality of the centre.

Housing above shops

The Council supports the development of housing within centres and Central London including above shops where it does not prejudice the ability of the ground floor unit to be used for town centre uses.

Neighbourhood Centres

The Council will seek to retain convenience shopping for local residents in Camden's neighbourhood centres and will ensure that development in them does not harm the function, character or success of that centre.

Protecting and enhancing the role and character of Camden's centres

- 9.14 The Council will protect and enhance the role and character of each of Camden's centres by assessing proposals against this policy and the centre specific guidance set out in Camden Planning Guidance 5: Town Centres, Retail, and Employment. Camden Planning Guidance 5 sets out the mix of uses that the Council expects on primary and secondary frontages, including:
- the minimum proportions of shops (A1 use);
 - the maximum proportions of food, drink, and entertainment uses (A3, A4, A5 uses); and
 - the proportions of uses has been set for the individual needs of each centre.

Housing above shops

- 9.15 The Council supports the development of housing within centres and within Central London including above shops units to support the vitality and viability of these centres and to help meet housing need. The development of housing should not prejudice the ability of the ground floor unit to be used for town centre uses.

Neighbourhood Centres

- 9.16 Camden has 37 neighbourhood centres which cater for the day to day shopping and service needs of their local populations. The neighbourhood centres are spread across the borough, and vary in size and in role. They contain a range of uses including shops, food and drink uses, doctor and dentist surgeries and financial and professional services, and often have housing on upper floors. Housing is the Council's preferred use above ground floor level in neighbourhood centres and we will promote the residential use of vacant or underused floors.
- 9.17 Commercial and community uses are considered acceptable uses of upper floors providing they do not cause harm to the amenity of existing residents or introduce activity that would prejudice future residential use on other levels or in neighbouring properties.



- 9.18 The Council will seek to retain a strong element of convenience shopping for local residents in Camden's neighbourhood centres and ensure that any development in them does not harm the function, character or success of that centre. We will take into account the individual character of the centre when assessing development proposals but, as a guide, we will resist schemes that would result in less than half of ground floor premises in a neighbourhood centre from being in retail use or in more than three consecutive premises being in non-retail use. We will also take into account any history of vacancy in shop units and the prospect of achieving an alternative occupier for vacant premises. Applications for food, drink, and entertainment uses will be carefully assessed to minimise the impact on local residents and the local area.

Protecting shops outside of centres

- 9.19 Camden has many individual shops, cafés, and small shopping and service parades, complementing the role of larger town and neighbourhood centres. These provide for the day to day needs of the local population, workers and visitors and help provide locally accessible facilities for people with mobility difficulties. They also play an important social role in the surrounding community, as well as contributing to the character and identity of the local area.

Policy TC3 Protecting shops outside of centres

The Council will seek to protect shops outside centres.

We will only granting planning permission for development that involves loss of a shop outside designated centres provided:

- a. alternative provision is available within 5-10 minutes' walking distance;
- b. there is clear evidence that the current use is not viable; and
- c. within the Central London Area, the development positively contributes to local character, function, viability and amenity.

-
- 9.20 The Council wishes to retain local shops outside centres where possible, including those on small shopping parades. Therefore, we will resist the loss of shops (Use Class A1) unless there is alternative provision within 5-10 minutes walk (approximately 400-800 metres), depending on the scale of provision. We will also take into account the viability of the premises for the existing use, in particular any history of vacancy in a shop unit and the prospect of achieving an alternative occupier. However, we recognise that, as the number of people shopping locally has declined, it is unlikely that all shops outside centres will continue to find an occupier.
- 9.21 Within Camden's Central London area, there is significant competition between competing land uses. This means that additional protection is needed to prevent the widespread loss of A1 retail uses outside centres, in order to ensure that local shops are available for local residents, workers and visitors. Therefore, the Council will only grant permission for the loss of shops outside centres in Central London where it considers that the replacement use will also contribute positively to the local area. Appropriate alternative uses are considered to be housing and uses providing essential services for residents, businesses, workers and visitors such as professional and financial services, community facilities and launderettes.

Food, drink, entertainment and other town centre uses

- 9.22 Camden's image as a dynamic and attractive place is in part due to the number and quality of restaurants, bars and entertainment venues in the borough, with Camden Town and Covent Garden having particular concentrations of such premises. These play an important part in the night time economy of Camden and of London, socially, economically and in terms of job provision. Night time activity can also lead to problems such as antisocial behaviour, crime and fear of crime, noise, congestion, and disturbance.
- 9.23 Conflicts can arise as, due to the borough's densely developed, mixed use nature, much night-time activity occurs close to places where people live. In addition, large numbers of such uses can change the character of the area in which they are located and reduce its range of shops or the quality of the shopping environment. Conflicts can be made worse where a particular location becomes a focus for late night activity.
- 9.24 Eating, drinking and other leisure uses provide a key role in the attractiveness of Camden's centres. However, food, drink, and entertainment uses can affect the overall viability and vitality of a centre by eroding the retail offer and can have an impact on amenity through noise and other impacts. In order to protect the primarily retail role of core frontages, the preferred location of food, drink, and entertainment uses is secondary frontages.

Policy TC4 Food, drink, entertainment and other town centres uses

The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.

We will consider:

- a. the effect of development on shopping provision and the character of the centre in which it is located;
- b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;
- c. whether development results in a proliferation of payday loan stores, betting shops, pawnbrokers, or hot food take aways;
- d. the health impacts of development including avoiding hot food take away from being developed close to schools;
- e. the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;
- f. parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- g. noise and vibration generated either inside or outside of the site;
- h. fumes likely to be generated and the potential for effective and unobtrusive ventilation;

i. the potential for crime and antisocial behaviour, including littering.

To manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations to address the following issues:

- j. hours of operation;
- k. noise/vibration, fumes and the siting of plant and machinery;
- l. the storage and disposal of refuse and customer litter;
- m. tables and chairs outside of premises;
- n. community safety;
- o. the expansion of the customer area into ancillary areas such as basements;
- p. the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2); and
- q. the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area.

Contributions to schemes to manage the off-site effects of a development, including for town centre management, will be sought in appropriate cases.

Betting shops (Bookmakers), Payday Loan Shops, and Pawnbrokers

To prevent the proliferation of betting shops, payday loan stores, and pawnbrokers which harm the vitality and viability of our centres, the Council will generally resist schemes which result in more than one betting shop, payday loan store or pawnbroker within 400m distance of each other.

9.25

Town centre uses include:

- shops and markets (Use Class A1);
- financial and professional services (A2);
- cafes and restaurants (A3);
- drinking establishments (A4);
- hot food takeaways (A5);
- offices (B1a);
- hotels (C1);
- community uses (D1), including neighbourhood police facilities;
- leisure uses (D2);
- theatres (Sui Generis);
- a number of other uses not in any use class (see Other town centre uses below).

9.26

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

9.27

Policy TC4 Food, drink, entertainment, and other town centre uses will be applied to proposals for these uses, whether located inside or outside of a centre.

- 9.28 New shops, services, food, drink and entertainment uses can add to the vitality and vibrancy of Camden's centres and local areas. However, they can also have other impacts such as diverting trade and displacing existing town centre functions. As a result, the Council will seek to guide such uses to locations where their impact can be minimised. When assessing proposals for these uses, the Council will seek to protect the character and function of our centres and prevent any reduction in their vitality and viability by requiring sequential assessments and impact assessments where appropriate (in accordance with the National Planning Policy Framework) and through implementing this policy.
- 9.29 The Council will not grant planning permission for development that it considers would cause harm to the character, amenity, function, vitality and viability of a centre or local area. We consider that harm is caused when an impact is at an unacceptable level, in terms of:
- trade and turnover;
 - vitality and viability;
 - the character, quality and attractiveness of a centre;
 - levels of vacancy;
 - crime and antisocial behaviour;
 - the range of services provided; and
 - a centre's character and role in the social and economic life of the local community.
- 9.30 We will consider the cumulative impact of additional shopping floorspace (whether in a centre or not) on the viability of other centres, and the cumulative impact of non-shopping uses on the character of the area.
- 9.31 Camden Planning Guidance 5: Town Centres, Retail, and Employment provides detailed guidance on how we will treat planning applications for shops, food, drink, and entertainment uses in particular centres, taking into account their specific circumstances. Camden Planning Guidance 5: Town Centres, Retail and Employment supplementary document also provides information on when we consider that concentrations of food, drink, and entertainment uses, and reductions in the proportion of premises in retail use, would be likely to cause harm to the character, function, vitality and viability of a centre. We will take these and any other relevant supplementary guidance into account when we assess applications in these locations. We will also take into account any history of vacancy in shop units and the prospect of achieving an alternative occupier for vacant premises when considering proposals that involve the loss of retail premises.

Food drink and entertainment uses

- 9.32 Within each of Camden's centres, the Council will seek to prevent concentrations of uses that would harm an area's attractiveness to shoppers or its residential amenity. The Council wishes to see a wide range of entertainment uses within its centres, not just those that primarily involve drinking, and will encourage suitable uses that contribute towards this.
- 9.33 Where food, drink and entertainment uses are permitted, they will need to be managed to protect the amenity of residents and the potential for additional housing in the area. To ensure such uses do not harm amenity or the character of an area, either individually or cumulatively, we will consider applying controls on:

- hours of operation;
- refuse and litter;
- noise/vibration;
- fumes;
- customer area;
- local management issues; and
- changes of use.

9.34 Where appropriate, we will use planning conditions or obligations to ensure that any remaining impact is controlled. Policy A1 - Managing the impact of development sets out further measures to manage the impact of development on amenity.

9.35 The Council will seek to ensure that community safety issues associated with proposals are fully addressed. As well as appropriate design measures, the Council will seek financial contributions towards management arrangements, including street wardens, CCTV, town centre management and other community safety schemes through the use of planning conditions and obligations, where appropriate. Camden's Statement of Licensing Policy sets out the Council's approach to licensing and the expectations that the Council and the Metropolitan Police have for those involved in licensed activities.

9.36 Camden Planning Guidance 5: Town Centres, Retail, and Employment provides further advice on the impact of food, drink and entertainment uses and provides detailed guidance on how we will consider applications for such uses in each centre.

Other town centre uses

9.37 A number of uses commonly found in centres (and smaller shopping parades) are not included in the A1, A2, A3, A4, A5, B1a, D1 or D2 Use Classes. These include amusement arcades, launderettes, saunas and massage parlours, car showrooms and minicab offices. While centres are generally the most appropriate location for these uses, the Council will carefully consider their potential impact when assessing planning applications to make sure that they do not harm the centre or the amenity of neighbours.

9.38 Particular issues that may arise include emissions and noise (e.g. from launderettes), highway and traffic problems (e.g. from minicab offices and car showrooms) and community safety and the fear of crime (e.g. from amusement arcades, betting shops, massage parlours and saunas, particularly where there are concentrations of such uses). Amusement arcades, massage parlours and saunas are unlikely to be considered acceptable in the busiest parts of centres or near to housing, schools, places of worship, hospitals or hotels.

Betting shops, payday loan stores, and pawnbrokers

9.39 Payday lending has grown rapidly in recent years as a convenient but expensive form of short-term personal credit. While much growth has been online, there is a significant presence of payday lenders on the high street. Many pawnbrokers also offer services as payday lenders.

9.40 Betting shops have undergone significant change in recent years with fixed odds betting terminals now accounting for a higher proportion of betting shop revenue than traditional over the counter betting. Gambling legislation limits the number of

fixed odds betting terminals to four machines per premises, which have driven a proliferation of betting shops on the high street.

- 9.41 The number of betting shops, payday loan stores, and pawnbrokers has increased in Camden in recent years. Some centres have areas where a number of these uses are concentrated, including the south end of Camden Town and parts of Kilburn High Road (including properties in Brent). The Council considers that the proliferation of such use is damaging the character of town centres.
- 9.42 Therefore, in order to ensure our centres provide a good range of shops and services and to maintain the amenity, vitality, and viability of Camden's centres, the Council will resist concentrations of betting shops, payday loan stores, and pawnbrokers. The Council will therefore generally resist applications for more than one betting shop, payday loan store, or pawnbroker to be located with a 400m distance of each other.

Small and independent shops

- 9.43 Small shops, often run by independent traders and providing specialist shopping, help to sustain the diversity, vibrancy and character of our centres and smaller shopping areas and provide suitable premises for local businesses. As the retail market changes there is a trend towards fewer larger shops. Many residents have expressed support for measures to encourage small shops and initiatives to encourage and promote retail diversity and entrepreneurialism in the borough.
- 9.44 The Council aims to provide an adequate supply of retail floorspace with a range of small and large units in town centres to meet the needs of different types of businesses. However, the Council's powers to help protect and promote small and independent shops are limited. For example, in most cases planning permission is not required to prevent adjacent shops being combined into larger premises.

Policy TC5 Small and independent shops

The Council will promote the provision of small shop premises suitable for small and independent businesses.

We will:

- a. expect large retail developments to include a proportion of smaller units;
 - b. attach conditions to planning permissions for retail developments to remove their ability to combine units into larger premises, where appropriate; and
 - c. encourage the occupation of shops by independent businesses and the provision of affordable premises.
-

- 9.45 The Council will resist the loss of shop premises in our centres where we consider that this would harm the character, function, viability and vibrancy of the area, however the Council cannot influence the occupier of individual premises or the type of goods and services they provide.

Provision of small shops as part of new developments

- 9.46 The Council will support and encourage the provision of small shop units as part of retail developments. As a guide, small units are considered to be those that are less than 100 sqm of gross floorspace, although we will take into account the character and size of shops in the local area and the function of centres when assessing the appropriate scale of new premises.



- 9.47 The centre-specific profiles set out locations where the Council will expect the provision of small units where this is relevant to the character and function of particular centres (for example to the north of Camden High Street), and also where the provision of larger units will be supported (for example at Kilburn High Road and to the south of Camden High Street).
- 9.48 In addition to the above, we will encourage developers and owners to seek independent occupiers for small units, where possible, and provide premises at affordable rents to encourage small businesses. This will be achieved through the use of planning obligations. We will work with developers to assess how such provisions can be taken forward as part of new developments. 'Independent occupiers' will be broadly considered to be businesses with no more than five stores. Affordable rents are considered to be those significantly lower than the market rate, and would normally be applied to accommodation for smaller, independent businesses.

Markets

- 9.49 Camden is well served by markets, ranging from street markets such as Inverness Street, Chalton Street, Leather Lane and Queens Crescent to the world famous Camden Town markets (e.g. the Stables and Camden Lock markets). Markets add greatly to the variety, interest and attraction of shopping in the borough and are a source of local employment, often providing more flexible and casual work opportunities. Street markets can be an important source of fresh food, often grown more locally than food from supermarkets. They can also help to meet the specialist food needs of ethnic communities; black and minority ethnic groups tend to make significantly more use of local markets than the general population. It is important that markets are carefully managed to prevent any potential negative impacts such as congestion and litter.

Policy TC6 Markets

The Council will promote and protect markets in Camden.

We will:

- a. resist the permanent loss of market uses unless comparable replacement provision is made or there is no demand for continued market use;
- b. take into account the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets;
- c. support new markets that will not cause individual or cumulative harm to the local area.

When assessing planning applications for new markets, the Council will consider:

- d. their effect on local residents and environmental conditions;
- e. their impact on transport and pedestrian movement, including the effect on access and circulation, highways, parking and servicing;
- f. their effect on local centres and shopping provision;
- g. the storage and disposal of litter and refuse;
- h. community safety and noise; and
- i. toilet provision.

-
- 9.50 The Council will protect markets in the borough by resisting their permanent loss unless alternative, comparable market provision is made nearby or it is demonstrated to the Council's satisfaction that the level of demand means that continued market use is no longer economically viable. Where markets are temporarily closed for extended periods, for example to enable priority redevelopment proposals to proceed, comparable temporary provision nearby will be strongly encouraged.
- 9.51 The character of a market depends on many factors including the type, range and quality of goods sold, the size of stalls and pitches and its environmental quality. Changes to markets can affect their character and consequently the character and attraction of the local area or centre. When assessing proposals for the refurbishment and/or redevelopment of a market, we will take into account its existing character and its importance to the character, vitality and viability of the centre or area in which it is located. We will expect proposals to consider and, where appropriate, reflect this character.



- 9.52 Alongside their benefits, markets can, when poorly designed or managed, cause harm to surrounding areas, for example in terms of congestion on footpaths and roads, litter, refuse storage and noise. Proposals for markets should therefore include provision for careful management, design out opportunities for crime and, where appropriate, contribute towards environmental and street improvements and initiatives such as improving areas for parking and servicing. We will use conditions and/or legal agreements when granting planning permission to ensure the operation of markets do not have harmful impacts and require detailed layout plans to be submitted as part of planning applications for market uses to allow us to consider whether these matters have been properly addressed.

10. Transport

Transport

10.1 Camden faces significant challenges relating to its transport network as the borough suffers some of the worst air pollution and road traffic congestion in the UK. These issues have a significant impact upon climate change and on the health and well-being of Camden residents. Camden's population is also forecast to grow by over 1,500 people per year until 2031 which will create further pressures on the transport network.

10.2 In order to address these problems and the become more sustainable, Camden prioritises sustainable transport such as walking, cycling and public transport and will seek to reduce use of motor vehicles. Sustainable transport supports the primary aims and objectives of both the Camden Transport Strategy 2011 and the Camden Plan 2012. The benefits of sustainable travel include:

- improvements in health and well-being;
- reduced congestion;
- improvements in air quality; and
- improved opportunities.

Improvements in health and well-being

10.3 There is an important link between the environment in which we live and how healthy we are, both physically and mentally. Improving our health and well-being requires more than improving access to medical treatment and services and daily physical activity is one such requirement. Thirty minutes of accumulated moderate physical activity five times a week is recognised as providing substantial health benefits. Active travel, such as walking and cycling, is one of the easiest and most cost effective means for people to achieve this. It is estimated that at least 30% of Camden's population do not engage in any physical activity. For many, active travel represents the only opportunity to exercise. Reducing levels of obesity and associated illnesses (such as heart disease, high blood pressure and diabetes) is one of the primary aims of Camden's Health and Well-being Strategy and encouraging active travel will help to achieve this. Walking and cycling can also benefit mental health by reducing levels of depression and stress, improving mood and raising self-esteem.

10.4 The borough also experiences high levels of road noise caused by congestion which can significantly impact upon the quality of people's lives as it can cause anxiety and sleep disruption.

Reduced congestion

10.5 Sustainable transport offers the best means of reducing congestion by ensuring that Camden's road network runs as safely and efficiently as possible.

10.6 Traffic congestion can cause delay to essential services and freight and can limit economic growth. At present there is little or no spare capacity on most of Camden's road network with average speeds of just 10 miles per hour. Increasing road capacity (such as widening roads or building bigger junctions) within such a densely populated area as Camden is not a feasible or sustainable option.

10.7 High levels of congestion can impact upon road safety. Between 2008-2010, there were 902 casualties on Camden's roads, representing a significant increase since 2005. Reducing congestion will also help achieve the Council aim to reduce casualties by 11% by 2019-2020.

Improvements in air quality

10.8 Air pollution affects people's quality of life and harms health and well-being. A study in 2010 by the Mayor of London confirmed that an estimated 4,267 premature deaths in London in 2008 could be attributed to long-term exposure to particulate matter. Young people, older people and those living with existing lung and heart conditions are particularly vulnerable.

10.9 Road transport is a major source of air pollution in London – this is primarily from vehicle exhausts and tyre and brake wear. Furthermore, within the Greater London area 58% of nitrogen oxide and 68% of fine particle emissions come from road transport.

10.10 The World Health Organisation has found that diesel fumes have carcinogenic properties, to a similar level as passive smoking. Air pollution also damages biodiversity and contributes to climate change.

10.11 Camden, like many other boroughs across London, has failed the Government's air quality objectives for Nitrogen Dioxide (NO₂) and Particulate Matter 10 (PM₁₀) since 2000 and has been declared an Air Quality Management Area (AQMA). In line with policy CC4 - Air Quality and Camden's Air Quality Action Plan, Camden seeks to reduce air pollutants (NO₂, PM₁₀, PM_{2.5}) across the borough.

Improved opportunities

10.12 Transport is a fundamental activity in people's daily life and can enhance personal freedom, education, social and life opportunities. Access to jobs, training, education, support services, shopping, friends and relatives, leisure and participation in community life is dependent on people's ability to move around. Reducing inequality is a key aim of the Camden Plan. Sustainable Transport therefore provides a more affordable alternative to car use and ensures that the vulnerable and disadvantaged are not excluded or isolated.

Prioritising walking, cycling and public transport

- 10.13 Development should prioritise the needs of pedestrians and cyclists and ensure that public transport will be the primary means of travel to and from the site.
- 10.14 Where appropriate, development will also be required to provide for interchanging between different modes of transport.

Policy T1 Prioritising walking, cycling and public transport

The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Walking

In order to promote walking in the borough and improve the pedestrian environment for residents and visitors, we will seek to ensure that developments:

- a. improve the pedestrian environment by supporting high quality public realm improvement works, including implementation of the West End Project at Tottenham Court Road/Gower Street;
- b. make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and increased tree and vegetation coverage;
- c. are easy and safe to walk through ('permeable');
- d. are adequately lit;
- e. provide high quality footpaths that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users such as textured paving where appropriate; and
- f. provide bridges and water crossings where appropriate.

Cycling

In order to promote cycling in the borough will seek to ensure a safe and accessible environment for cyclists, we will ensure that development:

- g. provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and Cycle Superhubs;
- h. provides for accessible, secure cycle parking facilities exceeding minimum standards and requirements outlined in Camden Planning Guidance 7: Transport supplementary document. Higher levels of provision will be also be required in areas well served by cycle path infrastructure, taking into account the size and location of the development;
- i. makes provision for high quality facilities that promote cycle usage including workplace showers and lockers;
- j. are easy and safe to cycle through ('permeable'); and
- k. provide bridges and water crossings suitable for cycle use where appropriate.

Public Transport

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development:

- l. contributes towards improvements to the bus network including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information; and
- m. contributes towards travel interchange facilities particularly in locations where changes to different modes of transport are expected.

Walking

- 10.15 Walking is a zero carbon means of transport and provides significant benefits in terms of promoting more active, healthy lifestyles (see policy C1 - Health), and helping to create more active, vibrant streets and public spaces.
- 10.16 Policy D1 - Design and Camden Planning Guidance 1: Design supplementary document sets out the Council's approach to providing attractive streets and spaces. Public realm improvements will primarily be delivered by the Council using funds from Transport for London, the Council's own funding and, where appropriate, developer contributions. The Council will continue to work with Transport for London and neighbouring London boroughs to deliver improved pedestrian accessibility across borough boundaries.

Cycling

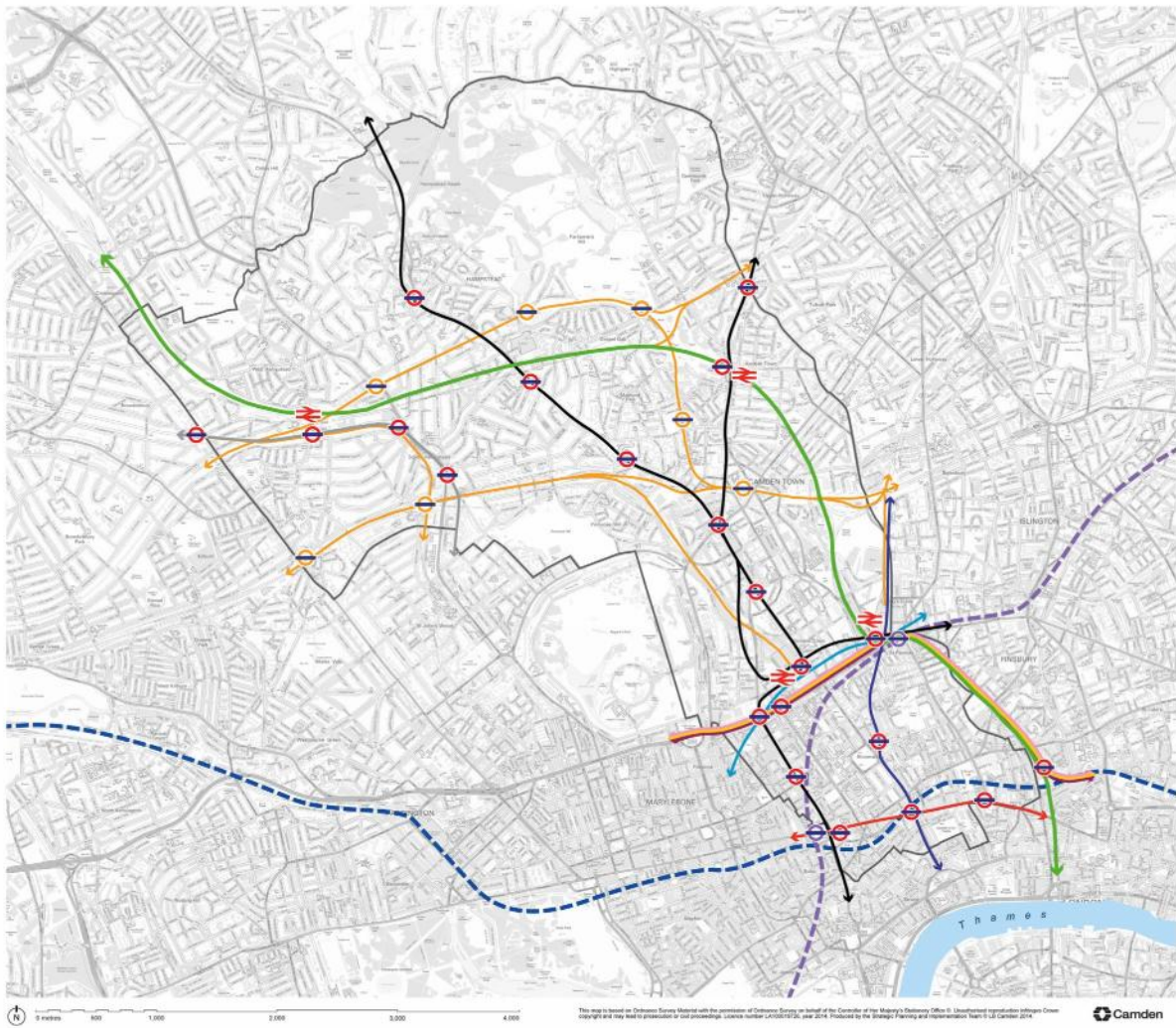
- 10.17 Cycling is an increasingly popular and sustainable means of travel that provides the opportunity to relieve congestion, deteriorating air quality and carbon emissions, particularly in the context of a growing population as well as promoting healthy, active lifestyles. Between 2001-2009 travel by bicycle doubled and Camden's Transport Strategy seeks to build further on this by improving cycling facilities, routes and creating the conditions that will encourage further take up of cycling. The Council will therefore ensure that developments contribute to and, where appropriate, provide appropriate links to strategic cycle routes and maximise the availability of new cycle parking. Further information is available within Camden Planning Guidance 7: Transport supplementary document.



Public Transport

- 10.18 Camden has some of the best levels of public transport accessibility in the UK including a direct link to continental Europe through St Pancras International; national rail services at King's Cross, St Pancras and Euston; 23 tube stations within the borough or on its boundary, 55 bus routes and 27 night bus routes. These provide excellent accessibility within Camden, to the rest of London and beyond.
- 10.19 In partnership with Transport for London, which manages the bus network across London, the Council will ensure that Camden's growth is matched by improvements in bus services, where required. This will include contributions to the provision of new bus facilities (for example, bus stops and improved bus services) where appropriate.
- 10.20 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. Further information is available within Camden Planning Guidance 7: Transport supplementary document.

Map 7: Rail networks



- CrossRail I, CrossRail II
 - ThamesLink
 - Overground
- Underground**
- Bakerloo
 - Central Circle
 - Hammersmith & City
 - Jubilee
 - Metropolitan
 - Northern
 - Piccadilly
 - Victoria
 - Overground

Car-free development and limiting the availability of parking

- 10.21 Limiting the opportunities for parking within the borough can reduce car ownership and use and lead to reductions in air pollution, noise levels, congestion and improve the attractiveness of the area for local walking and cycling. Car-free development will also mean that land can be used more efficiently, creating further space for housing, employment and improvements to the public realm.
- 10.22 Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, especially in its conservation areas. This form can be broken if garden features are replaced by areas of paving or hard standing. Car parks can also damage the visual setting of individual buildings and the character of the wider area.
- 10.23 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). This adds to the pressure on the drainage system and increases the risk of flooding from surface water.

Policy T2 Car-free development and limiting the availability of parking.

The Council will limit the availability of parking and require all new developments in the borough to be car-free with the exception of wheelchair accessible parking.

We will:

- a. restrict off-street car parking to:
 - i) spaces designated for disabled people;
 - ii) any operational or servicing needs;
 - b. not issue on-street parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
 - c. resist the development of boundary treatments and gardens within existing developments to provide off-street parking; and
 - d. support the use of existing car parks for alternative uses.
-

Car-free development

- 10.24 Car-free development means that there is no car parking within the site other than that reserved for disabled people or operational or servicing needs. In addition, current and future 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.
- 10.25 Any parking proposed (other than that designated for disabled people) as part of new residential development will not be permitted. Parking will only be considered for new non-residential developments where it is essential for operational requirements and therefore integral to the nature of the business or service (e.g. car hire, storage and distribution uses). In such cases, parking will

only be permitted on-site and where an essential need has been demonstrated. Normal staff parking is not considered essential and will not be permitted.

- 10.26 Land is an important resource, particularly within a densely populated area such as Camden. Car-free development will therefore help to free up space to allow additional housing, employment uses, community facilities, play areas, amenity spaces and cycle parking. The Council will therefore support the use of existing parking space for alternative uses. Redeveloped sites should not retain existing levels of parking provision. Further information is available within Camden Planning Guidance 7: Transport supplementary document.

Government consultation that could change our approach

- 10.27 Currently, parking standards are set by local authorities. During July 2014 however, the government began consultation to investigate the effects resulting from councils setting maximum parking standards. The Council recognises that the outcome of this consultation may affect parking policies.

Improving strategic transport infrastructure

- 10.28 Strategic transport infrastructure projects such as the creation of a new transport interchange at Euston Station and Crossrail 2 will play a central role in promoting sustainable transport and supporting future growth in the borough. Development will largely be concentrated in locations that are, or will be, subject to significant improvements to sustainable transport facilities, services and capacity.

Policy T3 Improving strategic transport infrastructure

The Council will seek improvements to strategic transport infrastructure in the borough.

We will:

- a. protect existing and proposed transport infrastructure (particularly routes for walking, cycling and public transport) from removal or severance; and
 - b. not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects.
-

- 10.29 Camden's Infrastructure Schedule 2014 (Appendix 1) sets out further details regarding the current schemes that will help deliver key transport infrastructure improvements within the borough. These include:

- Crossrail;
- West End Project;
- Routes to Farringdon Station; and
- Camden Town and Holborn Station capacity improvements.

- 10.30 Given the constraints on transport capacity in a densely developed borough like Camden, almost every part of the existing transport infrastructure is a valuable asset. The Council will therefore seek to protect all existing and proposed facilities and links (including for Crossrail 2) and safeguard the potential for improvements to the transport network.

- 10.31 The Council will complement the provision of strategic transport infrastructure by working to improve local level sustainable transport measures. The Camden Transport Strategy sets out how we intend to deliver more sustainable transport and is a key mechanism for the implementation of the transport objectives set out in the strategy.

Promoting the sustainable movement of goods and materials

- 10.32 The movement of goods and materials by road can have a significant impact on the environment and the health and well-being of residents, in terms of noise disturbance and its contribution to road congestion and air pollution. These impacts are particularly severe in an urban, densely populated borough such as Camden.
- 10.33 Demand for freight is likely to continue to increase (the number of vans in Central London, for example, is forecast to grow by 30 per cent between 2008 and 2031 – Camden Transport Strategy 2011). The Council will therefore seek to minimise the movement of goods and materials by road and promote more sustainable means of freight transport.

Policy T4 Promoting the sustainable movement of goods and materials

The Council will seek to minimise the movement of goods and materials by road.

We will:

- a. encourage the movement of goods and materials by canal, rail and bicycle where possible; and
- b. protect existing facilities for waterborne and rail freight traffic and seek provision of freight consolidation facilities.

Developments that generate significant movement of goods or materials by road (both during construction and operation) will be expected to:

- c. minimise the impact of freight movement via road by prioritising use of Transport for London road Network or other major roads; and
 - d. provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments.
-

- 10.34 The Council will promote the use of cycle freight as an extension to cycle courier services by encouraging developers to make provision for cycle freight as part of Delivery and Servicing Management Plans. This provides the potential to manage deliveries in a way that is zero carbon, has little or no noise or air pollution implications, and has a minimal impact on congestion. Further information regarding Delivery and Servicing Management Plans is available in Camden Planning Guidance 7: Transport supplementary document.
- 10.35 The Council recognises the problems that are caused by long distance movement of goods by road, and the potential advantages of using rail and water as alternatives.
- 10.36 The North London Line, the Gospel Oak to Barking Line and the West Coast Mainline are already used for significant volumes of rail freight. Rail freight is promoted as a real alternative to road as it contributes nearly 90% per tonne fewer emissions (London Rail Freight Strategy 2007).

- 10.37 Regent's Canal is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from canal-side sites. The Council will expect new developments along or close to the Canal to consider its use for the movement of goods and materials, and to contribute to the improvement of the Canal towpath, where appropriate. The Canal is a Metropolitan Site of Importance for Nature Conservation (SINC) as it supports a range of aquatic flora, fish species, invertebrates, waterfowl and a variety of waterside plants growing on its brickwork and banks. Developments which generate freight movements via the canal may be required to provide evidence that operations will not cause excessive disturbance to habitats in line with policy A3 – Biodiversity.



- 10.38 Camden will protect track side freight processing sites such as the existing aggregate handling facility at King's Cross, which is a modern facility re-engineered in association with works for the Channel Tunnel Rail Link. We will also protect canal-side freight facilities.
- 10.39 For further details regarding Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments, please refer to Policy A1 – Managing the impact of development.

11. Delivery and monitoring

Delivery and monitoring

- 11.1 This section provides an overview of the ways the Council will deliver the Local Plan's vision, objectives and policies, focussing on how we will:
- work with our partners;
 - ensure necessary infrastructure is provided;
 - make use of planning obligations and the Community Infrastructure Levy (CIL);
 - monitor how effective we are in delivering the Local Plan.
- 11.2 A key mechanism for delivering the Local Plan will be the Council's decisions on planning applications. The policies in the Local Plan and, for relevant locations, the Site Allocations document, Area Action Plans, the forthcoming North London Waste Plan and neighbourhood plans will provide the framework for these decisions. We will also take account of the Council's supplementary planning documents (including Camden Planning Guidance, planning briefs and frameworks and conservation area statements, appraisals and management strategies) when determining planning applications.

Policy DM1 Delivery and monitoring

The Council will deliver the vision, objectives and policies of the Local Plan by:

- a. working with a range of partners to ensure that opportunities for creating the conditions for growth and harnessing its benefits for the borough are fully explored;
 - b. work with the relevant providers to ensure that necessary infrastructure is secured to support the growth and provide the facilities needed for the borough's communities. Information on key infrastructure programmes and projects in the borough up to 2031 are set out in Appendix 1;
 - c. use planning contributions where appropriate to;
 - i. support sustainable development;
 - ii. secure the infrastructure, facilities and services to meet the needs generated by development;
 - iii. mitigate the impact of development;
 - iv. secure appropriate scheme implementation (including multi-site developments) and control phasing where necessary;
 - d. work with neighbouring boroughs to coordinate delivery across boundaries; and
 - e. monitor the implementation of the Local Plan policies and infrastructure provision on a regular basis.
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Working with our partners

- 11.3 Central to the delivery of the Local Plan will be working with our partners and developing new solutions to deliver the Camden Plan. During the preparation of this Local Plan the Council has worked with key delivery partners to ensure the strategy and policies also reflect their aspirations, plans and spending programmes where appropriate.

- 11.4 Camden has a range of distinctive neighbourhoods that are integral to its character and the Local Plan seeks to protect. Our visions and objectives for areas such as Euston and Fitzrovia are set out in Area Action Plans, which have been developed in conjunction with our partners and the communities and business stakeholders.
- 11.5 In some parts of Camden, community-led neighbourhood plans are being developed by neighbourhood forums to provide additional area specific policy. Neighbourhood plans are able to promote growth equal to, or greater than, the Local Plan. The Council is supporting and advising neighbourhood forums with this work. The Fortune Green and West Hampstead Neighbourhood Plan was the first in Camden to reach the examination stage at the end of 2014. Please see our website for more information on the areas in Camden where neighbourhood planning is taking place.
- 11.6 London's Central Activities Zone (CAZ), with its unique range and concentration of uses/activities, falls within a number of boroughs, including the southern part of Camden (see Map 1 - Key Diagram). The Council will continue to work with these boroughs, Central London Forward and the West End Partnership to consider matters such as planning policy, the quality of public areas and pedestrian environment, traffic management / congestion and the infrastructure requirements of Central London, as well as more innovative ways of delivering growth and the objectives for the area.
- 11.7 The Council supports business led initiatives including Business Improvement Districts such as Camden Town Unlimited, Inmidtown and Fitzrovia Partnership, that bring together the businesses, community groups, third sector partnerships and residents to deliver real change in the local areas, as well as supporting smaller business organisations.
- 11.8 The preparation of the Local Plan will also involve local community groups and residents and businesses as part of the consultation and engagement processes. The Council's Statement of Community Involvement sets out how we intend to involve the local community and other stakeholders in the preparation and implementation of our planning policy documents and in the consideration of planning applications.

Ensuring necessary infrastructure is provided

- 11.9 It is vital that the transport facilities and services, utilities and social infrastructure needed to make development work and support local communities are provided, particularly in the parts of the borough that will experience most growth in future years.
- 11.10 The Council has commissioned an update to the borough's Infrastructure Study, which shows the strategic items of infrastructure to support growth over the lifespan of the Local Plan. The 2014 Update reviews relevant infrastructure providers' plans and strategies and has been informed through a process of consultation with infrastructure providers. A schedule of key infrastructure programmes and projects by infrastructure type is set out in Appendix 1. It is not an exhaustive list of all the infrastructure likely to be required to support the delivery of new homes, business growth and the creation of sustainable, healthy communities. Other items will be required, as appropriate, in response to new development in the borough.

- 11.11 Appendix 1 sets out the anticipated timing or phasing of infrastructure provision where known. This will depend on many factors, including when the development envisaged by this Local Plan takes place, the availability of funding, the timing of major investment (and ability to undertake detailed feasibility studies) and in some cases planning consent for the infrastructure project itself.
- 11.12 Some of the items on this list are already in the process of being developed. In other cases, they have been identified in service providers strategies and business plans as likely to be required. These investment plans take into account forecast changes in population and household numbers to identify where future capacity issues may occur. There is more scope for certainty in the next 3-5 years as major items of infrastructure have been programmed, costs and means of fundraising are at least in outline form and the broad locations of development are well understood.
- 11.13 In order to support growth in the borough, the Council will safeguard and improve essential social, physical and green infrastructure and work with service providers to ensure the timely delivery of the new and enhanced infrastructure needed to ensure that the quality of life of Camden's residents and workers is not harmed. Where relevant, the individual sections in the Local Plan also contain details of required infrastructure and mechanisms for its delivery.
- 11.14 The Council will encourage dialogue between developers and service providers, including the services provided by the Council itself, to ensure that new infrastructure provision properly acknowledges opportunities and constraints of the specific development site and its surroundings. For example, it will be important that developers take account of the opportunities to link their schemes with surrounding green infrastructure.
- 11.15 Where necessary, development will be phased to ensure it comes forward at the same time as, or following, the provision of infrastructure. Growth which is poorly programmed can lead to infrastructure problems and negative impacts on the local population.

Making use of planning obligations and the Community Infrastructure Levy

- 11.16 One of the key mechanisms for delivering community infrastructure over the Plan period will be the Council's Community Investment Programme (CIP). Please see section 1 Delivery and location of growth for more details.
- 11.17 The Camden Site Allocations document contains further information about the infrastructure requirements of the sites and areas in the borough that area expected to experience significant development.

Planning obligations

- 11.18 New development proposals should be sufficiently supported by infrastructure. This can increase the pressure on existing infrastructure, from large-scale facilities serving a wide catchment to small-scale local provision.
- 11.19 The Council will use planning obligations, in appropriate circumstances and in accordance with paragraphs 203-205 of the National Planning Policy Framework to mitigate or compensate for its potential effects. This will be where existing and planned infrastructure provisions are not adequate to meet the needs generated by a development proposal.

- 11.20 Planning obligations (sometimes called Section 106 agreements) can help to contribute to the success of a development and achieving the Council's aims for a site, its local area and the borough as a whole. They can enhance the quality of a development and ensure it does not give rise to unacceptable planning impacts. Planning obligations will only be sought where it is not possible to deal with the matter through the imposition of a condition on a planning permission. It is not possible to use planning obligations for items that are to be funded by the Community Infrastructure Levy (CIL – see below).
- 11.21 The measures sought through a planning obligation will vary depending on the nature and scale of a development scheme, its location and impacts. The main matters that the Council considers are likely to be addressed through such agreements are:
- on-site provision of infrastructure to mitigate the direct impacts of development, such as landscaping, servicing and direct access (these may also be addressed through S278 agreements), particularly for major developments (where not CIL funded);
 - affordable housing;
 - tackling climate change and environmental impacts;
 - training, skills and regeneration;
 - phasing of development; and
 - other obligations necessary to making a development acceptable.
- 11.22 This list is not exhaustive and development schemes can individually or cumulatively introduce a range of issues, requirements and impacts that may justify the use of planning obligations alongside the Community Infrastructure Levy.
- 11.23 Planning obligations can take different forms and can involve the provision of certain requirements 'in kind' or financial contributions. In considering planning obligations, the Council will take into account economic viability, the full range of benefits provided by a development, the extent to which it contributes towards delivering the objectives of this Local Plan and other planning policies and whether a development is publicly funded.
- 11.24 Where during the negotiation of a proposed scheme, it is argued that the Council's request for contributions would render development unviable, we will expect developers to provide information on viability through an "open-book" approach. However, because the provision of certain infrastructure is necessary to make development acceptable in planning terms, there will be instances where reducing contributions on viability grounds would make development unacceptable, either because development cannot come forward without it in narrow physical or safety terms or because it is necessary to mitigate the impacts of growth.
- 11.25 Planning obligations that reduce some negative impacts of a development or otherwise contribute to the Local Plan objectives will not in themselves justify accepting development that conflicts with planning policy. Pooled contributions will be used when the combined impact of up to five schemes create the need for related infrastructure or works that will not be funded by CIL. Additional detail on the Council's approach to planning obligations is set out in Camden Planning Guidance 8: Planning Obligations supplementary document.

Community Infrastructure Levy

- 11.26 The Community Infrastructure Levy, introduced by the Planning Act 2008 came into force on 6 April 2010 (amended 2011, 2012, 2013 and 2014) enabling local authorities to raise funds for infrastructure to meet the needs arising from new developments. For the purposes of the Act, infrastructure includes: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. It is based on a formula relating to the type and size of development and is collected when planning permissions for new developments are implemented. Negotiated planning obligations will still be possible for site specific issues and to allow for affordable housing to be delivered.
- 11.27 Both Camden and the Mayor of London have the powers to raise a CIL. On 1 April 2012, the Mayor of London introduced a CIL with the aim of raising £300M of funding to contribute towards the Crossrail by the end of 2018/19. The Mayor's CIL is charged at £50 per sqm in Camden on all uses except schools/colleges and medical/health services and is collected by Camden.
- 11.28 In order to introduce a Camden CIL, the Council has investigated the appropriateness of developing a Camden CIL and considers that CIL will impact delivering the aims of this Local Plan.
- 11.29 The adoption of a Camden Community Infrastructure Levy (CIL) will require the publication of a CIL regulation 123 list which will define infrastructure projects or types of infrastructure project to which CIL funding will be applied and in respect of which, by default Section 106 planning obligations would not normally be sought. CIL will only be charged on the additional floorspace (or 'uplift') in a development.
- 11.30 It is not possible to use CIL to remedy existing deficiencies unless new development would exacerbate these problems. In addition the adoption of CIL will limit the use of pooled funding to a maximum of five Section 106 agreements, even where infrastructure is not included in Regulation 123 list.
- 11.31 A meaningful proportion of funding should be spent in the neighbourhood where development arises. This is 15% as a minimum, or 25% where there is an adopted Neighbourhood Plan. Neighbourhood Forums should establish their own infrastructure priorities (providing detailed projects where possible) during the preparation of a neighbourhood plan.
- 11.32 Additional detail on the Council's approach to CIL is set out in our Camden Planning Guidance 8: Planning Obligations supplementary planning document.

Co-ordinating with neighbouring boroughs

- 11.33 Under the Localism Act 2011 and the tests of soundness in the National Planning Policy Framework local authorities have a 'duty to co-operate' on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities
- 11.34 The Council is working with neighbouring boroughs, the wider North London sub-region and other Central London local authorities to ensure that Camden's Local Plan takes account of their plans and programmes as well as the spending and delivery plans of regional bodies such as Transport for London.

- 11.35 The Council also works closely with neighbouring boroughs to ensure that a consistent approach is taken in relation to growth areas and town centres which straddle borough boundaries. To this end, discussions with Westminster, in relation to the Tottenham Court Road area, and with Brent, in relation to Kilburn High Road town centre, have informed and shaped the direction taken on these locations in the Local Plan. In addition, we have prepared our housing market evidence for this Local Plan in conjunction with the London Borough of Islington.
- 11.36 We are also preparing a joint Waste Plan with the six other North London Boroughs (Barnet, Enfield, Hackney, Haringey, Islington and Waltham Forest). This will show how the authorities will meet their apportionment of waste in the London Plan. It will also contain a suite of development management policies. The Waste Plan is expected to be submitted to the Secretary of State in June 2016. See policy CC5 - Waste for further details.
- 11.37 Working closely with our partners in the delivery of the Local Plan will help in the identification, as early as possible, of matters and situations that may effect delivery.

Flexible implementation of the Local Plan

- 11.38 The Local Plan needs to be flexible enough to ensure that the Council's vision and objectives for Camden can be delivered in future years despite changing circumstances. This is particularly important with regards to delivering our approach to Camden's growth and meeting the borough's needs for homes, jobs, services and infrastructure.
- 11.39 There is a need for sensitive and flexible implementation. However, while our plans must be suitably flexible, it is vital that the level of flexibility does not create uncertainty or harm the overall delivery of the Local Plan. This Local Plan has therefore been prepared to be flexible enough to cope with a changing world, while ensuring our vision and objectives for the borough are delivered.
- 11.40 Sometimes the Local Plan's implementation will rely upon appropriate alternative or amended approaches to deal with emerging issues and changing circumstances. A comprehensive package of transport measures is identified to support growth in jobs and homes. Physical transport infrastructure is complemented by a range of initiatives to increase walking and cycling and other public transport initiatives, such as substantial Underground line capacity improvements (see Appendix 1: Key infrastructure programmes and projects) items). These, coupled with existing high levels of public transport accessibility, mean that no one element of transport infrastructure is critical to the delivery of the overall strategy, and that even if any individual scheme does not come forward, sufficient provision will be made to support growth.
- 11.41 Individual policies in this Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes, the feasibility of particular measures and site specific issues. Within the Plan period, efficiency savings in the public and voluntary sector will require the need to find more effective ways of delivering services. This may entail the greater consolidation of sites in order to cluster and maximise the impact of local services. The Local Plan takes account of changing forms of delivery in its policies relating to the retention and reprovision of services. It is

also anticipated that the demand for physical assets will continue to decline as more services become accessible online.

Monitoring

- 11.42 The Council will monitor the effectiveness of the Local Plan in delivering its objectives by regularly assessing its performance against a series of indicators. We will publish annual monitoring reports, which will:
- assess the performance of the Local Plan policies;
 - set out the Council's updated housing trajectory;
 - identify the need to reassess or review any policies or approaches;
 - make sure the context and assumptions behind our strategy and policies are still relevant; and
 - identify trends in the wider social, economic and environmental issues facing Camden.
- 11.43 Regular monitoring will be a key tool in providing flexibility. This will measure progress in delivering the Local Plan, and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation. This will allow us to adjust the application of policies where appropriate and, if necessary, bring forward alternative approaches or policies.

12. Appendices

Appendix 1 Infrastructure Schedule

Appendix 1: Infrastructure Schedule

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
CHILDREN AND EDUCATION SERVICES						
1	Early years.	Provision of additional 545 full time equivalent early years places (for three and four year olds) to meet identified need. Extending the early years' places entitlement for the most disadvantaged 2 year olds.	Borough wide.	LB Camden – Children, Schools and Families Directorate.	2015-2031.	Funding partly through Section 106 where need arises. Potentially through Community Infrastructure Levy in the future. Places requirement based on statutory requirement of 15 hours per week. From September 2014, the Government extended eligibility to 40% most disadvantaged 2 year olds. It is expected over 900 children will be able to qualify.
2	Primary Schools.	Expansion of Kingsgate School, Liddell Road (2 Form entry).	West Hampstead North West sub area).	LB Camden – Children, Schools and Families Directorate.	2016/17.	Camden is able to meet the demand for primary school places until at least 2023/24. Up to 2028/29, an additional 1.7 to 2.3 Form entry may be required, including provision in the Euston area (i.e. 2 Form entry at Camden Cutting, 1-2 Form entry Regent's Park Estate and possibly expand Edith Neville by 1 Form entry). Government funding used for school place provision and some Section 106. Liddell Road is a Community Investment Programme scheme. Potential funding from Community Infrastructure Levy to address impact in the future..
3	Primary Schools.	New school (2 Form entry) – King's Cross Academy.	King's Cross (South of Euston Road sub area).	LB Camden – Children, Schools and Families Directorate.	2015.	As above.
4	Primary Schools.	Hawley School – additional 123 places.	Camden Town with Primrose Hill (Central North sub area).	LB Camden – Children, Schools and Families Directorate.	2016/17.	As above.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
5	Primary Schools.	Abacus Belsize School – expansion of provision (1 Form entry) (unconfirmed).	Belsize (Central North sub area).	Free school / Department for Education.	2017.	As above.
6	Secondary Schools.	Maintaining secondary school provision to meet the demand for places.	Borough wide.	LB Camden – Children, Schools and Families Directorate.	2015-2031.	Demand for secondary school places is projected to remain within capacity until 2019/20. A forecast peak in demand is anticipated in 2020/21 which may require temporary provision. Post 2023/24, 2 Form entry may be required (the large majority in the Central South sub area) but some of this demand can be met through spare capacity. Additional capacity is likely to be needed to serve development in the Euston area.
7	Further Education.	Gross demand of 1,520 places – 1,230 sixth form places and 290 Form entry college and work based learning places.	Borough wide or elsewhere in Greater London.	Education Funding Agency and Skills Funding Agency.	2015-2031.	The Form entry provider is Westminster Kingsway College (WKC). The WKC Camden campus has recently been rebuilt on a site in King's Cross under the (now defunct) Government's Building Colleges for the Future programme.
8	Adult Learning.	294 additional adult learning places will be required to meet growth in population.	Borough wide (and within other London Boroughs).	Skills Funding Agency / various providers including WKC and City Lit.	2015-2031.	LB Camden provides a package of Adult Community Learning supported by the Community Learning and Adult Skills Budget.
HEALTHCARE SERVICES						
9	Primary Healthcare – GPs.	Gross demand of 19 additional full time equivalent GPs.	Borough wide.	NHS England and Camden Clinical Commissioning Group .	2015-2031.	There are a number of models of delivery for meeting increased GP provision including the creation and expansion of facilities and co-location with other community services.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
ADULT SOCIAL CARE						
10	Community Resource Centre at Greenwood Place.	A new day care facility providing services for people with dementia, mental health conditions and learning difficulties. It will also host the Centre for Independent Living giving advice and support for people with disabilities. Provides additional capacity for young people with profound and multiple learning difficulties who use services outside of Camden.	Kentish Town.	LB Camden – Adult Social Care.	2016.	A Community Investment Programme (CIP) project. The proposal provides accommodation for each client group as well as flexible, communal space. Funding from capital receipts, disposal of existing facilities and Section 106.
11	New residential care home, Wellesley Road.	Accommodation for 60 older people replacing facilities at Branch Hill House and St. Margaret's elderly person's home.	Gospel Oak.	LB Camden – Adult Social Care.	2015.	Capital receipts from the disposal of existing assets. The new care homes at Maitland Park opened in 2013 and the facility at Wellesley Road will reduce the need to spot-purchase nursing beds in the Borough.
12	Replacement of Charlie Ratchford Resource Centre in Belmont Street with a new facility in Crogsland Road.	Development of a new resource centre with provision of extra care flats.	Haverstock.	LB Camden – Adult Social Care.	2016.	Capital receipt from the disposal of existing asset.
13	Holmes Road Hostel.	Redevelopment of the hostel to create 59 studio units for single homeless people.	Kentish Town.	LB Camden – Housing and Adult Social Care.	2015.	A Community Investment Programme (CIP) project. Disposal of one hostel contributing to the redevelopment of two sites (Mount Pleasant opened in 2014 providing 50 studio units).

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
LEISURE AND COMMUNITY FACILITIES						
14	Increasing capacity of sports halls – by providing new sports halls, extending opening hours and optimising use of existing halls.	New 4 Court Facility to be provided at King's Cross. Pursue opportunities to extend community use to school facilities.	King's Cross and rest of Borough taking account of deficiency areas.	Private developer / Schools through dual-use agreements.	2015 Plan period.	21 additional badminton courts required in order to meet the shortfall in sports hall facilities (Open Space, Sport and Recreation Study 2014). A new 4 court hall opened at UCL Academy in 2013. King's Cross facility being provided through Section 106 to serve major development. Potential for Community Infrastructure Levy to be used to refurbish and maintain existing sports facilities.
15	Provision of a bespoke gymnastics facility and additional tennis provision.	Gymnastics is a LB Camden Focus Sport. The specialist facilities provided at Talacre Community Sports Centre are at full capacity 4 additional courts are required in the borough to meet need up to 2025.	Borough wide taking account of deficiency areas.	LB Camden / private developer.	Plan period.	There is currently no commitment to increase provision but there would appear to be an unmet demand, including for specialist provision. Additional tennis provision is not currently funded but potential for provision through Section 106 or Community Infrastructure Levy.
16	Provision of new public open space and enhancement of existing spaces and their facilities.	New public open space will be secured through development schemes, with priority given to deficiency areas. Park Improvement Projects and Community led Parks Projects.	Borough wide taking account of deficiency areas.	Private developers / LB Camden Parks and Open Spaces working with landowners, land managers and community management.	Plan period.	Developers to mitigate impact through Section 106 agreements. Community Infrastructure Levy will potentially mean a wider range of developments will fund park improvements. Deficiency areas exist in the west, south and central parts of the Borough. The Council's Parks Improvement Programme is a 5 year programme funded by a combination of Section 106, capital funding and external grants.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
17	Improving access to nature through biodiversity enhancing measures in new development.	<p>Biodiversity gains are achieved through the provision of new natural greenspaces in major developments and enhancement measures delivered through other schemes e.g. green roofs, wildlife corridors, biodiversity enhancing landscaping.</p> <p>The Council is working with partners to develop the biodiversity value of parks and the use of nature sites as an educational resource.</p>	Borough wide taking account of deficiency areas.	Private developers / LB Camden Parks and Open Spaces.	Plan period.	<p>Camden's Biodiversity Action Plan (BAP) runs 2013-2018.</p> <p>There are three key areas of focus;</p> <ol style="list-style-type: none"> 1. Access to Nature, 2. The Built Environment, and 3. Open Spaces and Natural Habitats, <p>Developments will be required to mitigate their impact through Section 106 agreements.</p> <p>The Open Space Study identifies wards with low levels of provision.</p>
18	Improvements to the quality and access of playspace for children and young people.	New and refurbished playspace for children and young people.	Borough wide taking account of deficiency areas.		Plan period.	<p>Developers to mitigate impact through Section 106 agreements. Community Infrastructure Levy will potentially mean a wider range of developments would be able to support play provision.</p> <p>All wards in the Borough have areas outside of the catchment area for formal children's play facilities.</p> <p>Deficiency areas exist in the west, south and central parts of the Borough.</p>
19	Establishment of new allotments and food growing areas.	Expansion of opportunities for food growing including incorporation of allotments and community gardens in major developments, planting of food growing strips, roof gardens, re-use of open space (e.g. housing estate amenity space) and temporary use of vacant or derelict land and buildings.	Borough wide taking account of deficiency areas.	LB Camden Parks and Open Spaces / allotment associations / private organisations and voluntary groups	Plan period.	<p>The identified space for food growing may be secured through planning condition or Section 106 agreement.</p> <p>The spatial provision of allotments is uneven with around half of all households outside the catchment area for council or community managed allotments.</p>

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
20	Street trees programme.	Planting of additional street trees to ensure 800 new trees are planted. New developments and public realm schemes to include trees in their design wherever possible.	Borough wide.	LB Camden Trees team and Highways / Transport for London.	Plan period – new tree target (2010-2020).	The Council will ensure new trees are considered in the design process, including use of Section 106. Potential funding through Community Infrastructure Levy in the future. Funding support from the Mayor of London.
21	Library improvements.	Possible re-provision of libraries at Crowndale Centre (Camden Town Library) and Holborn.	Regent's Park and Holborn and Covent Garden wards.	LB Camden Culture and Leisure.		The Crowndale Centre forms part of the Council's Accommodation Strategy disposals. The library can potentially be re-provided in a redevelopment or nearby. Possible re-location of Holborn Library through the Community Investment Programme.
22	Community Centres.	Provision of new community centres.	Various locations.		2015-2020.	Community Investment Programme is the primary mechanism of delivery. Projects currently planned are: Reprovision of St Pancras Community Centre, Repair and improvements to Highgate Newtown Community Centre, Relocation of the Surma Centre, and New Abbey Community Centre proposed as part of the Abbey area redevelopment project. Use of Section 106 funding to mitigate impact and Community Infrastructure Levy in the future.
STRATEGIC TRANSPORT						
23	London Overground capacity improvements on North London Line.	5 car trains being introduced to reduce crowding. This is then planned to increase to 6 car operation.	Highbury and Islington to West Croydon/Clapham Junction and Richmond/Clapham Junction to Stratford.	Transport for London / Network Rail.	2015 2019-2024.	London Overground Capacity Improvement Project The North London Line runs east to west through Camden; there are 6 stations on this line in the Borough.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
24	London Over-ground Gospel Oak –Barking line.	Electrification project to allow operation of longer, electric trains.	Gospel Oak to Barking line.	Transport for London / Network Rail.	2015/16 – 2020/21.	The Gospel Oak line has one station in Camden at Gospel Oak.
25	Crossrail 1.	Delivery of east-west new railway through London from Reading/Heathrow to Abbey Wood and Shenfield.	Central Activities Zone.	Transport for London and Department for Transport.	2018-19.	Linked to the realisation of regeneration and intensification opportunities within the Central Activities Zone. Crossrail stations at Tottenham Court Road and Farringdon most likely to support Camden's growth. Funding from public bodies, Mayoral Community Infrastructure Levy and Business Rate Supplement.
26	Rebuilding of Tottenham Court Road Station.	Provision of new ticket halls to serve the Underground and Crossrail 1. Provision of step free access.	Tottenham Court Road.	Transport for London and Department for Transport.	2016-18.	Rebuilding due to be completed in 2016 ready for running of first Crossrail services in 2018.
27	West End Project.	Introduction of two-way traffic at Tottenham Court Road and Gower Street and public realm improvements at Euston Circus, St Giles Circus and Princes Circus.	Central Activities Zone.	LB Camden with partners.	2015-2017.	A 'Major Scheme' funded by Transport for London through a competitive step-bid process.
28	Holborn Improvement Project.	A major scheme supporting improvements in the area being delivered through Crossrail, In Midtown Business Improvement District and at Holborn Underground Station.	Holborn.	LB Camden with partners.	2017-2019.	A 'Major Scheme' which has to undergo a competitive bidding process.
29	Holborn and Bloomsbury Area Scheme.	Urban realm and road safety improvements, reducing traffic dominance.	Holborn.	LB Camden with partners.	By 2018	The Council maintains a rolling three year Programme of Investment with an annual financial allocation made by Transport for London to support delivery. Area based schemes are funded through a block grant from Transport for London (part of the Corridors, Neighbourhoods and Supporting Measures programme). Supplemented by funding from developer contributions and LB Camden funding.
30	Kilburn Area Scheme.	Urban realm and road safety improvements, regeneration of the High Street.	Kilburn.	LB Camden with partners.	By 2017.	

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
31	King's Cross Area Scheme.	Walking, cycling and urban realm improvements. Addressing the gyratory and movements north-south across Euston Road.	King's Cross.	LB Camden with partners.	By 2016	
32	Farringdon Area Improvements.	Urban realm and cycle permeability measures.	Routes to Farringdon station.	LB Camden with partners.	By 2018.	
33	Camden and Kentish Town and Wider Area Scheme.	Unlocking the gyratory at Camden Town and improving cycle permeability with a focus on east-west routes and extending the Royal College Street cycle route.	Camden Town and Kentish Town.	LB Camden with partners.	By 2022.	
34	Borough-wide schemes.	Schemes include advanced stop lines for cyclists, a borough-wide 20mph limit, pedestrian signage and way-finding and cycle hire.		LB Camden.	Rolling 3 year programme.	The Council maintains a rolling three year Programme of Investment with an annual financial allocation made by Transport for London to support delivery. These borough wide schemes are also supported by the block grant from Transport for London (and part of the Corridors, Neighbourhoods and Supporting Measures programme).
35	North-South 'Cycle Superhighway' between Elephant and Castle and King's Cross.	Creation of a segregated cycle corridor to improve safety and reduce conflict with motor vehicles. North of Farringdon station the route is proposed to connect to a new 'Quietway' backstreet cycle route.	Cross borough.	Transport for London / LB Camden.	2015-16.	Funding available from Transport for London for a four year period (2014/15 to 2016-17) from the More People Travelling by Bike programme – this funds cycle parking and cycling to school projects. Developer contributions towards sustainable transport.
36	'Quietways'.	Cycle routes intended to link destinations in the Central London area with back street routes, including parks and waterways.	Cross borough.	Transport for London / LB Camden.	2015-16.	As above.
37	Central London Cycle Grid.	A network of high quality and high volume cycle routes formed from cycle superhighways, quiet shared streets and local links.	Cross borough.	Transport for London / LB Camden and partners.	By 2016.	As above

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
38	High Speed 2.	New railway linking London Euston and Birmingham Curzon Street (Phase 1). Further extension to cities north of Birmingham (Phase 2).	Cross borough.	Department for Transport / High Speed 2.	Phase 1 completion due 2026, Phase 2 in 2033.	High Speed 2 is strongly opposed by Camden Council. Hybrid Bill going through Parliament. Planned construction start date is 2017.
39	Crossrail 2	Planned to relieve mainline rail terminals and crowding on London Underground lines. It would link south west and north east London. Stations being proposed in the Borough are at Tottenham Court Road (to link with Crossrail 1) and Euston St Pancras.	Cross borough.	Department for Transport / Transport for London.	By 2030.	The Department for Transport consulted on the draft Safeguarding Directions at the end of 2014. The estimated cost is £12-20bn in 2012 prices.
40	Potential redevelopment of Euston Station.	Comprehensive redevelopment of Euston railway station – potentially a component of High Speed 2.	Euston area.	Network Rail / Transport for London / High Speed 2.	Late 2020s.	High Speed 2 is a rail link being planned by the Government between London and Birmingham with the London terminus at Euston.
41	Improvements to Camden Town Underground Station.	Station upgrade to increase capacity and provide step free access from street to platforms.	Camden Town.	Transport for London.	2019-2024.	Subject to funding.
42	Northern Line Upgrade and Extension.	Increasing service frequency and capacity to at least 30 trains an hour on main branches at peak period.	Cross borough.	Transport for London.	2022.	Northern line runs from Edgware and High Barnet/Mill Hill East to Morden. There are 11 stations in Camden.
43	Piccadilly Line Improvement.	Renewal of signalling and train fleet.	Cross borough.	Transport for London.	Early 2020s.	Piccadilly Line runs from Heathrow to Cockfosters. There are 3 stations in Camden.
44	LU Sub-surface upgrade.	New train fleets and signalling system to allow increased service frequencies on Circle, Hammersmith and City and Metropolitan Lines.	Cross borough.	Transport for London.	By 2018.	There are 2 stations on these lines (Kings Cross St Pancras and Euston Square).
45	Victoria Line Improvement.	Track and signalling works to increase frequency to 36 trains per hour during peak periods.	Cross borough.	Transport for London.	By 2016.	There are 3 stations in Camden on the Victoria Line.

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
46	Thameslink Programme.	Allow frequent 12 car trains to run north-south, significantly enhancing capacity.	Cross borough.	Network Rail.	By 2018.	The Thameslink runs north-south with stations at West Hampstead, Kentish Town, St Pancras and Farringdon.
UTILITIES AND PHYSICAL INFRASTRUCTURE						
47	Water supply	Every five years water companies produce Water Resources Management Plans (WRMPs) which set out the current water supply-demand balance and use population projections to ensure that future population growth is planned for. Thames Water's WRMP 2015-2040 shows there is a forecast surplus of supply in Camden for 2026. A c.25MI has been commissioned at Barrow Hill to provide adequate storage capacity.	Barrow Hill and rest of Borough	Thames Water	2015	The WRMP contains specific resource development schemes and demand management actions.
48	Wastewater	A London wide issue is the frequent discharge of storm sewage into the River Thames. The London Tideway Improvement Programme intends to address the issue through the upgrade and extension of Sewage Treatment Works, the construction of the Lee Tunnel and Thames Tideway Tunnel. The current programme of upgrades will accommodate London's growth to 2021. The Thames Tunnel is expected to be complete by 2023.	Whole Borough	Thames Water	Plan period	Investment is financed through charges to water company customers. Thames Water seeks approval of strategic growth schemes from OFWAT through a 5 year periodic review (the next review is in 2019).

Item No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
49	Development of decentralised heating networks.	<p>Development of a Combined Heat and Power network in Somers Town to heat four estates and potentially commercial buildings.</p> <p>Francis Crick development to provide heat to four estates.</p> <p>Potential to deliver a new heat network at Kentish Town and expand the networks at Euston and Bloomsbury.</p>	Somers Town and Euston.	LB Camden.	2015 2015 2020s	Extensions to the network are currently unfunded.
50	Waste Management.	Modern waste facilities to manage North London's waste. This includes the North London Heat and Power Project – the development of an Energy Recovery Facility (ERF) for use by seven North London Boroughs.	Including Edmonton EcoPark (LB Enfield) – the proposed location for the ERF.	North London Waste Authority.	2025	The North London Waste Authority will be applying for a Development Consent Order for the Energy Recovery Facility.
51	Digital connectivity.	Improved internet access through the acceleration of high speed connectivity, including public wireless systems.	Borough wide with a focus on where this maximises benefits for the community and business.	LB Camden, Greater London Authority, BT Openreach and other industry partners.	Plan period.	Camden's Digital Strategy sets out a series of actions (2014-17) to support the uptake of high quality, next generation connectivity. This includes better connections for businesses and residents already on-line, tackling the 'digital divide' where people lack the confidence to use IT and greater use of digital technology to deliver services.

Appendix 2 Noise Thresholds

Table A: Noise levels on residential sites adjoining railways and roads at which planning permission will not normally be granted

Noise description and location of measurement	Period	Time	Sites adjoining railways	Sites adjoining roads
Noise at 1 metre external to a sensitive façade	Day	0700-1900	74 dB LAeq'12h	72 dB LAeq'12h
Noise at 1 metre external to a sensitive façade	Evening	1900-2300	74 dB LAeq'4h	72 dB LAeq'4h
Noise at 1 metre external to a sensitive façade	Night	2300-0700	66 dB LAeq'8h	66 dB LAeq'8h

Table B: Noise levels on residential sites adjoining railways and roads at and above which attenuation measures will normally be required

Noise description and location of measurement	Period	Time	Sites adjoining railways	Sites adjoining roads
Noise at 1 metre external to a sensitive façade	Day	0700-1900	65 dB LAeq'12h	62 dB LAeq'12h
Noise at 1 metre external to a sensitive façade	Evening	1900-2300	60 dB LAeq'4h	57 dB LAeq'4h
Noise at 1 metre external to a sensitive façade	Night	2300-0700	55 dB LAeq'1h	52 dB LAeq'1h
Individual noise events several times an hour	Night	2300-0700	>82dB Lamax (S time weighting)	>82dB Lamax (S time weighting)

Table C: Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted

Vibration description and location of measurement	Period	Time	Vibration levels
Vibration inside critical areas such as a hospital operating theatre	Day, evening and night	0000-2400	0.1 VDV ms-1.75
Vibration inside dwellings	Day and evening	0700-2300	0.2 to 0.4 VDV ms-1.75
Vibration inside dwellings	Night	2300-0700	0.13 VDV ms-1.75
Vibration inside offices	Day, evening and night	0000-2400	0.4 VDV ms-1.75
Vibration inside workshops	Day, evening and night	0000-2400	0.8 VDV ms-1.75

Table D: Noise levels from plant and machinery at which planning permission will not be granted

NB: Noise should be measured 1m external to a noise sensitive façade in the case of buildings and noise at the nearest edge of the noise sensitive space in the case of gardens, balconies or open spaces

Noise description and location of measurement	Period	Time	Noise level
Noise at the nearest noise sensitive receptor	Day, evening and night	0000-2400	10dB(A) <LA90 (15 minutes)
Noise that has a distinguishable discrete continuous note (whine, hiss, screech, hum) at the nearest noise sensitive receptor	Day, evening and night	0000-2400	15dB(A) <LA90 (15 minutes)
Noise that has distinct impulses (bangs, clicks, clatters, thumps) at the nearest noise sensitive receptor	Day, evening and night	0000-2400	15dB(A) <LA90 (15 minutes)
Noise at the nearest noise sensitive receptor LA90>60dB	Day, evening and night	0000-2400	55dBLAeq (15 minutes)

Entertainment and leisure noise: Noise levels from places of entertainment and leisure in proximity to noise sensitive receptors at which planning permission will not normally be granted

Assessments for noise from entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used

to measure and assess the noise impact including LAeq and LAmax metrics and appropriate frequency spectrum.

Planning permission will not be granted in instances where it is not possible to achieve suitable and sufficient internal noise levels with reference to the most up to date and appropriate guidance within proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues.

Planning permission will not normally be granted in instances where there will be a significant adverse impact on external amenity areas including gardens, balconies and open spaces unless they can be appropriately mitigated.

Advice note

We recommend that you seek advice from the Environmental Health department in advance of any noise surveys on the location of measurements and the nearest noise sensitive receptor.

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