



The Planning Inspectorate

Report to the London Borough of Camden

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Camden Local Plan

The Plan was submitted for examination on 24 June 2016

The examination hearings were held between 18 and 25 October 2016

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Abbreviations used in this report

AAP	Area Action Plan
BIA	Basement Impact Assessment
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CIP	Community Investment Programme
DtC	Duty to Co-operate
GLA	Greater London Authority
GTAA	Gypsy and Traveller and Travelling Showpeople Accommodation Assessment
HMA	Housing Market Area
HMO	Houses in Multiple Occupation
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SA	Sustainability Appraisal
SME	Small and Medium Sized Enterprises
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Camden Local Plan provides an appropriate basis for the planning of the borough, provided that a number of main modifications (MMs) are made to it. Camden Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Alterations to the strategic affordable housing target to take account of updated trajectory work.
- Amendments to the gypsy and traveller pitch target to reflect needs identified in the Council's evidence.
- Deletion of the requirement, as expressed in Policies H4, H6 and H11, for residential schemes of 0.5 hectares or more to provide an element of traveller accommodation.
- Amendments to criteria in Policy A2 relating to the protection and re-provision of open space, to bring it in line with national policy.
- Deletion of the requirement in Policy CC2 for residential conversions and extensions to meet 'excellent' BREEAM standard (Building Research Establishment Environmental Assessment Method).
- Deletion of specific restrictions relating to the development of new betting shops, payday loan shops and pawnbrokers, as expressed in Policy TC4.
- Deletion of specific restrictions relating to the development of hot food takeaways, as expressed in Policy TC4.
- Various other changes to ensure the Plan is up to date, internally consistent, justified, effective and consistent with national and local policy.

Introduction

1. This report contains my assessment of the Camden Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Camden Local Plan, submitted in June 2016, is the basis for my examination. It is the same document as that published for consultation in February 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council has requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs (document reference ED36) and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report, and in light of this I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the context of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Local Plan Policies Map and the Camden Local Plan Policies Map Alterations (CD1.3 and CD1.2).
6. The policies map is not defined in statute as a development plan document, and so I do not have the power to recommend main modifications to it. However, the Council has proposed a number of changes to the Policies Map to ensure it is effective. These further changes were published for consultation

alongside the main modifications (ED39¹). When the Plan is adopted, in order to give effect to the Plan's policies and comply with the legislation, the Council will need to update the adopted Policies Map to include the further changes.

Assessment of Duty to Co-operate

7. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
8. The Council has prepared a Duty to Co-operate (DtC) Statement (CD2.44) which sets out the nature of joint working which has been undertaken in the preparation of the Local Plan. The DtC Statement was published when the Plan was submitted for examination, and was not available when the submission draft plan was published for comment. However, the Statement is not specified as a proposed submission document in the Regulations². Furthermore, information on consultation was available at pre-submission stage, and I note that comments were received on DtC from a number of representors. Overall I am therefore satisfied that representors have not been unduly prevented from commenting on DtC as part of the legal compliance of the plan.
9. The DtC Statement describes various partnerships and groupings in which the Council participates. The Council has regular meetings with the Greater London Authority (GLA), and has a strong working relationship with other London boroughs through forums such as the Association of London Borough Planning Officers, Central London Forward and the North London Housing Partnership. Constructive engagement with neighbouring authorities and bodies prescribed in section 33A has also taken place at appropriate stages in the plan-making process, as well as with other partner organisations.
10. Housing is one of the key strategic matters on which the Council has sought to develop common approaches through cross-boundary working. Cooperation has mainly focused on work with other London boroughs and the GLA. However, as set out in the Mayor for London's Housing Supplementary Planning Guidance (SPG) (2016), the GLA has also undertaken engagement with authorities in neighbouring regions on cross-boundary strategic planning and coordination issues. This has included the sharing of data on demographic assumptions and out-migration in relation to housing needs. As a strategic planning body, and given the practicalities of engaging with numerous authorities outside London, I consider that the GLA is appropriately based to undertake cross-regional work in this regard.
11. No adverse comments or objections have been made by the GLA, London boroughs or other prescribed bodies on the basis of a failure to cooperate. I also note that none of the neighbouring boroughs has requested that Camden should accommodate any of their unmet housing needs. Concerns have been raised that the DtC has not been satisfied in relation to matters of air pollution and retail. However, I consider that these relate more to policy effectiveness, and accordingly are dealt with under the main issues below.

¹ Camden Local Plan Policies Map Alterations (November 2016).

² Town and Country Planning (Local Planning) (England) Regulations 2012.

12. In conclusion the evidence indicates that the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan. Therefore, overall I am satisfied that the Council has complied with the duty set out in section 33A of the 2004 Act.

Assessment of Soundness

Background

13. The Plan covers the whole of Camden borough. It has been prepared pursuant to the Mayor of London's London Plan (2016)³ and policies from this document apply to the Plan area where relevant. The GLA has confirmed that the Camden Local Plan is in general conformity with the London Plan, and I concur with this position.
14. The Local Plan sets out a strategy for the growth of the borough, and a range of policies that will be used to determine planning applications. The development plan also incorporates a number of other documents, including a Site Allocations document⁴, the Euston Area Plan and the Fitzrovia Area Action Plan (AAP). The production of separate documents is allowed under planning legislation. However, there is no reference in the Local Plan to the Council's intended update of the current Site Allocations document, following adoption of the Local Plan. Accordingly, I consider that modification **MM01** is necessary in the interests of clarity and effectiveness.

Main Issues

15. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness, rather than responding to every point raised by representors.

Issue 1 – Does the overall growth and spatial strategy present a positive framework which is consistent with national and local policy and will contribute to the achievement of sustainable development?

16. Policy G1 provides an overarching framework to guide the delivery and location of growth in the borough. It sets out a clear strategy for promoting the efficient use of land, which is soundly based in the context of capacity limits in the borough. The locational strategy in the policy also seeks to focus growth in sustainable locations across the borough, in line with the spatial strategy in the London Plan.
17. The Council's evidence indicates that the Growth Areas in Camden are likely to be a significant source of future development. The Growth Areas are consistent with the Opportunity Areas and Areas for Intensification identified in Policy 2.13 of the London Plan, but also include Kentish Town Regis Road. The site is currently in low density employment use. However, the Council's

³ 'The London Plan – the spatial development strategy for London' Mayor of London (2016) as amended and incorporating the Minor Alterations dated March 2016.

⁴ Camden Site Allocations Local Development Document (2013) (CD3.7).

evidence indicates that there is capacity to facilitate higher density industrial provision alongside new housing, without unduly affecting the operation of businesses.

18. The Council's Community Investment Programme (CIP) is also identified as a key source of growth over the Plan period, and a source for additional affordable housing in Policy H5. Whilst I note some objections to CIP from local community groups, CIP is an established Council-led programme for generating funds for schools, community facilities and housing, including the regeneration of its housing estates. The programme is expected to deliver a substantial number of additional homes over the Plan period, as well as employment opportunities, school places and community facilities. Planning permission has already been granted on a significant number of sites, and other schemes are in the pipeline (ED13). As a major source of growth within the borough I consider that the references to CIP within Policy G1, including the Somers Town CIP, are justified.
19. A Neighbourhood Plan for Somers Town is currently being prepared and a draft for consultation was published in 2016. The Local Plan does not specify the number of houses or specific parameters or boundaries relating to the Somers Town CIP, and in this regard I am satisfied it provides a flexible broad framework against which a Neighbourhood Plan can be developed. I also note that the strategic priorities for the area, as referenced in the Local Plan, were developed in conjunction with the local community. Overall, I am satisfied that the CIP section of the Local Plan would not prejudice the preparation of the Neighbourhood Plan. Moving forward it will be important for the Council and the preparatory body⁵ to work closely together to ensure that the two plans support and complement each other.
20. Policy G1 also summarises Camden's objectively assessed needs for housing, employment and retail development over the Plan period. These specific growth requirements are considered within the relevant sections below.
21. Development and population increase inevitably results in some effects, for example an increase in traffic, the loss of a particular view or increased demands on local services. Nevertheless, there is a need for on-going development, and growth in Camden would facilitate benefits in terms of additional housing, affordable housing, jobs provision and community facilities. No fundamental infrastructure constraints have been identified by the Council or other service providers, and I note that the Council is engaged in proactive infrastructure planning to ensure that necessary infrastructure is secured and growth delivery is coordinated. The Local Plan itself also provides a wide range of policies which require impacts to be assessed and mitigated at planning application stage.
22. Overall, I am satisfied that the proposed growth strategy in the Local Plan is justified and sustainable, and that the Local Plan provides a positive framework for managing development.
23. In reaching this conclusion I have had regard to the issue of air quality and the effect that further development in the borough may have on existing levels

⁵ Somers Town Neighbourhood Forum.

of air pollution. Air quality is a key issue in Camden, and the whole borough is designated as an Air Quality Management Area for both nitrogen dioxide and particulate matter. The Council recognises its responsibilities and is working in partnership to address emissions through a range of actions and mitigation measures identified in the Camden Air Quality Action Plan and the Mayor's Air Quality Strategy. The Local Plan itself includes Policy CC4 which requires development to be air quality neutral in line with Policy 7.14 in the London Plan, and contains a range of other policies⁶ that should provide mitigation. Overall I consider that the Local Plan, in conjunction with other initiatives and cross-partnership working, provides a suitable framework for dealing with air quality.

Issue 2 – Are the housing requirements in the Plan justified, deliverable, in general conformity with the London Plan, and in line with national policy? Have the needs of particular groups, and affordable housing needs, been satisfactorily assessed and addressed within the Plan?

Overall housing requirement and delivery

24. The Camden Local Plan needs to be in general conformity with the housing requirements in the London Plan. Policy 3.3 in the London Plan (2016) identifies minimum housing supply targets for London boroughs, with the target for Camden being 889 dwellings a year. However, there is a significant gap between the London-wide requirement of 49,000 dwellings a year and aggregate borough level targets which identify annual capacity for only 42,000 dwellings. Therefore the Local Plan is also expected to demonstrate how the minimum target can be exceeded.
25. The NPPF states that local plans should meet the full objectively assessed needs (OAN) for market and affordable housing in the housing market area (HMA), as far as is consistent with its policies. However, overall need in London has been assessed on the basis of one HMA by the GLA, as informed by the London-wide Strategic Housing Market Assessment (2013) (London SHMA) and Strategic Housing Land Availability Assessment (2014) (London SHLAA).
26. Policy H1 in the Camden Local Plan indicates that the Council will seek to achieve provision of at least 16,800 additional homes between 2016/17 and 2030/31. This equates to about 1,120 dwellings a year and therefore exceeds the London Plan minimum target for Camden of 889 dwellings a year.
27. The housing target in Policy H1 has been informed by the Camden SHMA (2015) which identifies OAN for an additional 16,800 dwellings in the borough over the Plan period. The Camden SHMA's general OAN methodology appears to be robust and in line with guidance in the PPG (Planning Practice Guidance), and at the hearing there was general acceptance of the use of the GLA's 2014-round long-term scenario as the demographic starting point. The methodology incorporates an uplift of 20% to take account of market signals, which is proportionate in the context of high house prices in the borough.

⁶ Including Policy CC1 (energy use), Policy CC2 (sustainable construction), Policy T2 (car-free development), Policy T1 (walking, cycling and public transport), and Policy A2 (open space).

28. The Camden SHMA was jointly commissioned with the London Borough of Islington. At the hearing the Council confirmed that the Islington section of the document has yet to be published, but is based on the same broad methodology. Both boroughs lie in the Inner North London Broad Rental Market Area. The Council's evidence shows that there are strong synergies between the rental market in Camden and Islington, including significant numbers of residential moves between the two boroughs.
29. The Council's updated housing trajectory (ED36) identifies expected delivery of 17,116 homes over the Plan period. Although the Local Plan does not allocate new sites, there is a sizable estimated supply from outstanding allocations and CIP schemes. The estimates do not incorporate a non-implementation or discount rate for specific sites. Nonetheless, there may be some potential for additional supply from higher density development, intensification and windfall sites, as highlighted in the Plan. Accordingly, and having regard to the progress which has been made in delivering development in Growth Areas and allocation sites, I consider that there is persuasive evidence to suggest that the housing target of 16,800 would be met over the Plan period.
30. Since the Camden SHMA was produced, updated population and household projections have been published by the Office for National Statistics and the Department for Communities and Local Government. The GLA has also produced 2015-round long term population and household projections. The Council has calculated that if the latest projections are incorporated, OAN in Camden would increase to 18,700 dwellings over the Plan period, equating to 1,250 dwellings a year.
31. However, the on-going review of the London Plan and SHLAA will provide an opportunity to re-assess the latest projections and the distribution of growth between boroughs and potentially adjoining areas, linked to capacity. The target of 16,800 also represents a significant increase on past delivery, and is higher than the minimum London Plan target for Camden. There is also no substantive evidence that supply from other sources would be of a sufficient scale to meet a higher target of 18,700 dwellings. In this context I consider there would be little merit in adjusting the Council's overall housing target.
32. The updated trajectory (ED36) shows that there would be sufficient supply of housing in the first five years to meet requirements arising from the overall target of 16,800 dwellings, and those linked to an adjusted OAN, including the 5% buffer sought by the NPPF. The analysis indicates that there would be more than 7,100 additional homes over the five year period, clearly exceeding the adjusted target of some 5,880 dwellings. However, modifications are needed to the supporting text in the Local Plan (**MM06**) to reference the updated five year supply calculations.
33. In summary, the evidence suggests that the overall housing target in the Local Plan is robust and deliverable. As established above, there is no firm evidence before me that other London boroughs require Camden to meet any of their unmet housing needs. The anticipated provision in Camden would significantly exceed the minimum borough target in the London Plan, and make a sizable contribution to housing delivery across London as a whole. As such I consider it is in general conformity with the London Plan. Nevertheless, for reasons of clarity and effectiveness I consider that the Council's updated housing

trajectory should be included in the Plan (**MM92**), with reference to the updated trajectory figures in supporting text (**MM06**).

Targets for self-contained housing and student accommodation

34. In order to be effective, it is important that the Plan establishes a clear definition of self-contained housing. Accordingly, I recommend that the definition in the Plan is expanded to clarify that the Council defines self-contained housing as homes where all the rooms are behind a door that only one household can use, covering Use Class C3, and in some cases Use Class C4 and live-work units (**MM05, MM07**).
35. Policy H1 in the Local Plan includes a sub-target of at least 11,130 self-contained homes to be provided over the Plan period. Policy H9 also includes a minimum target of 2,400 additional places in student accommodation, which broadly equates to bedspaces. The Council has indicated that the residual gap of about 3,000 dwellings against the overall housing target of 16,800 units could be provided in the form of either self-contained dwellings or student accommodation.
36. The Local Plan's priority is for self-contained housing. In this context it has been questioned whether the self-contained target is too low and should be increased. However, the Council's updated housing trajectory work (ED36 and ED16) indicates that a significantly higher number of self-contained homes are likely to be delivered over the Plan period than the minimum target of 11,130 units. There is also no firm evidence before me that the scale of student housing or other forms of non-self-contained housing likely to come forward would be sufficient to fill the residual gap. On this basis I consider that the adjustment of the self-contained housing target is not necessary for soundness reasons.
37. The student housing target is not specifically required in the London Plan. Nonetheless, I consider that its inclusion would help to ensure that the accommodation needs of students are met. Student growth also forms part of the household projections on which the Council's overall housing target is based.
38. The student accommodation target is based on bedspaces rather than units. However, the Council's evidence on completions shows that a significant proportion of dedicated student accommodation is provided in the form of studios, and therefore in some schemes/buildings one unit equates to one bedspace. The use of bedspaces is also in line with the London Plan and the Mayor for London's Academic Forum's assessment of student accommodation needs.
39. The minimum target of 2,400 student housing places is based on estimated London needs identified by the Mayor's Academic Forum, sub-divided on the basis of the current proportional share of London students living in Camden and projected forward over the Plan period. The methodology is simplistic, but in general terms I am satisfied that the approach broadly accords with the Mayor's strategy for the dispersal of students in the London Plan. The Council's evidence (ED16) demonstrates that this minimum target is capable of being delivered over the Plan period, with a degree of flexibility for additional provision.

40. Overall I consider that the sub-targets in Policy H1 and Policy H9 provide a suitable framework for delivering self-contained housing and student accommodation. However, in order to provide clarity, modifications should be made to the supporting text to Policy H9 to include updated student accommodation delivery estimates **(MM32)**.

Maximising the supply of self-contained housing

41. Policy H1 identifies self-contained housing as the Council's priority land-use, and sets out a strategy to maximise its supply. In the context of the high level of housing need in the borough I consider this approach is justified. The Plan contains a wide range of other policies which seek to protect and/or provide other land uses or key assets, such as employment and open space. I am therefore satisfied that the Plan overall facilitates a proportionate approach, whereby the need for self-contained housing can be balanced against other requirements.
42. The proposed density range of 45 to 405 dwellings per hectare should help to maximise supply, and is justified by the high level of housing need and transport connectivity in the borough. It is proposed as a guide only, and the supporting text to Policy H1 clarifies that the London Plan density matrix (table 3.2) will be applied flexibly, taking into account local character. The Council is also committed to tackling the issue of unoccupied new homes, and is working with the GLA and other boroughs to establish a London-wide approach.
43. Policy H2 requires 50% of additional development floorspace in selected town centres and the Central London Area to be self-contained housing. The Council's viability work⁷, allied with evidence of recently completed schemes, indicates that this level of provision is deliverable across a range of locations and types of sites. Viability is not demonstrated in central London and the King's Cross area on high value office sites. However, the policy requirement would be subject to financial viability. There are other sites in the Central London Area which have lower use values and can support mixed-use development, and I therefore consider that a general exemption for central London is not necessary or appropriate.
44. The Council's viability work employs a standard residual land value methodology. The applied assumptions are based on local evidence and appear appropriate for a generic assessment of this nature. The supporting text to Policy H2 also confirms that viability and other considerations including the historic environment would be taken account in negotiations.
45. The threshold of 200 square metres (sqm) has been queried by representors, both in terms of scale and its application to any size of building. However, 200 sqm broadly allows capacity for a single self-contained home and a commercial unit. Furthermore, the threshold and 50% target are contained in the Council's current Core Strategy, and commercial schemes have continued to come forward.
46. Overall the evidence suggests that the general approach in Policy H2 is deliverable and justified, and incorporates some flexibility. Nevertheless, I

⁷ Camden Financial Viability Study (2015) (CD2.19).

consider that key elements of the policy, as currently expressed, are unclear and imprecise. The policy does not adequately clarify the geographical application of the approach, or whether 50% or up to 50% self-contained housing is sought. I also consider that the policy should be clearer regarding the circumstances when self-contained housing may be sought and provision made off-site. Accordingly I recommend modifications to the policy and the supporting text in order to aid effectiveness and clarity (**MM08, MM09, MM10, MM11, MM12, MM13**). In MM10, at the start of new paragraph 3.46A, I have slightly amended the wording put forward in the Council's published MMs (ED36) to clarify that the list is not exhaustive.

47. For reasons of effectiveness, I also consider that reference to the Knowledge Quarter should be included through modification **MM13**, given the importance of this area as a focus for economic growth, albeit recognising that it has a mix of uses.

Deferred contingent contributions

48. Policies H2 and H4 propose the use of deferred contingent contributions in cases where low amounts of self-contained or affordable housing have been secured at application stage for viability reasons. The policy wording indicates that this should take place 'prior to completion.'
49. Policy 3.12 in the London Plan refers to this re-appraisal taking place 'prior to implementation'. However, the Council's evidence shows that deferred contributions at or close to practical completion have been successfully secured in Camden on a range of different sized schemes, and for phased and non-phased development. The approach is also in line with guidance in the Mayor's Draft Affordable Housing and Viability SPG (November 2016) (CD5.21) insofar as it relates to schemes of 11 or more units, and the London Borough's Development Viability Protocol (November 2016) (CD5.22). These documents refer to reviews taking place at a 'later stage' taking account of values achieved, and acknowledge practical issues which may mean that financial contributions rather than units are sought.
50. Additional contributions would be linked to viability and on this basis would not cause significant harm in terms of scheme delivery. There is a cost associated with the actual re-appraisal process and analysis of data. However, this is likely to be modest and would form a small proportion of overall scheme costs.
51. Overall I therefore consider that the Council's proposed approach to deferred contingent contributions is justified, proportionate and would not place an unnecessary burden on developers. In reaching this conclusion I have had regard to several appeal decisions highlighted by representors. Nonetheless, the use of the deferred contingent approach is established in the London Plan, and in any event, each scheme needs to be assessed on its own merits. In the context of high sales values and price rises in Camden, I consider it represents a positive approach that could increase the supply of housing and affordable housing, and support Local Plan and London Plan objectives in this regard.

Protecting existing homes

52. Policy H3 resists the loss of existing residential floorspace. The supporting text confirms, however, that some flexibility would apply, and that the key issue is whether it affects the number of people who can occupy a dwelling.
53. The policy allows the net loss of one home. However, this approach allows two dwellings to combine into one larger unit, and as such would contribute to the identified need for additional family sized dwellings in the borough. On this basis, and having regard to the small number of single dwellings typically lost, I consider the Council's approach is justified and pragmatic.

Affordable housing

54. The strategic affordable housing target of 5,565 dwellings, as set out in Policy H4, is based on capacity estimates in the London SHLAA (2011). However, the Council's updated trajectory work (ED19) indicates that about 5,300 affordable units are likely to be delivered in Camden over the Plan period. The figure does not include the total estimated supply from small windfall sites, and therefore incorporates some flexibility to deal with the potential non-delivery of specific sites. As such, and taking account of the Council's viability work and other factors established in Policy 3.11 in the London Plan, I consider that a modified strategic target of 5,300 units is necessary and justified (**MM14, MM20**). Modification **MM14** also corrects an error in the listed Plan period.
55. The strategic affordable housing target is significantly lower than the need for about 10,000 affordable housing homes in the borough over the Plan period, as identified in the Camden SHMA. Nevertheless, as described above, the modified strategic target has been informed by analysis of capacity linked to viability work. As an inner London borough there are capacity constraints. The Local Plan does not make provision to meet the full needs for affordable housing, but it would not be realistic for it to do so. I also note that the methodology employed in the Camden SHMA is based on affordable housing forming a component of the full OAN for housing, and does not capture all existing households in need who currently live in other forms of tenure. If the latter approach was taken the level of identified affordable housing need in Camden would be higher.
56. Policy H4 proposes a threshold of 1 or more units for seeking affordable housing in connection with residential development schemes in the borough. However, national policy, as established in the Written Ministerial Statement (WMS) dated 28 November 2014, states that a threshold of 11 or more units should apply. Having regard to the Court of Appeal judgement⁸ I have considered whether local circumstances may justify lower thresholds as an exception to national policy.
57. The Council's evidence shows good rates of small site delivery, with about 41% of additional self-contained homes completed on schemes of less than 10

⁸ Secretary of State for Communities and Local Government v West Berkshire District Council and Reading Borough Council CI/2015/2559 [2016] EWCA Civ 441.

dwellings between 2005 and 2015. This represents a total of 2,412 homes on 1,056 sites⁹, with an average of 241 homes delivered per year.

58. The Council predicts a similar rate of small site delivery in the future, which I consider is reasonable given market buoyancy and high prices. However, the future estimated rate has been adjusted to exclude a number of schemes with less than 100 sqm floorspace, as Policy H4 is based on a capacity assessment whereby 100 sqm of floorspace is considered to create capacity for one home. This reduces the estimated future rate to 217 dwellings per year, from schemes of 1 to 9 units. This would be applied over the 11 year period 2020/21 to 2030/31, with existing small site permissions assumed to be built out in the early part of the Plan period. The Council's evidence also indicates that an additional predicted supply of 10 units per year could come forward from sites of 10 units.
59. The evidence indicates that small site delivery will be sizable and form a significant proportion of the total supply of self-contained units. The Council's evidence shows that application of a threshold of 1+ units, based on the proportions in Policy H4, would generate an additional £53 million or so through payments in lieu, equating to 268 additional affordable homes over the Plan period. This is based on a comparison with a threshold of 10 or more units, which is the general level recommended in Policy 3.13 in the London Plan. If future delivery from sites of 10 units is included, the amount of contributions and affordable homes delivered from small sites would be greater.
60. The Council's evidence indicates that a significant proportion of payments in lieu would be allocated to CIP schemes already in the pipeline, where full funding sources have not been identified. On this basis I am satisfied that, despite scarce land resources in Camden, the delivery of additional off-site affordable units elsewhere could be facilitated. Furthermore, as the Council's strategic affordable housing target is based on estimated supply from large committed sites, the delivery of funds from small sites could help the Council to meet its target.
61. As established above, the Council's evidence shows that the likely delivery of affordable housing in the borough over the Plan period will fall significantly short of needs identified in the Camden SHMA. Whilst this is not a situation which is unique to Camden, there are particular constraints regarding options to increasing housing delivery. Camden is located in inner London and its built-up areas are densely developed. As such the options to allocate additional greenfield land within or on the edge of the borough are extremely limited. The borough also does not contain large surplus industrial areas that would facilitate additional housing delivery. In this context I consider it is vital to maximise opportunities for the delivery of affordable housing on sites that do become available.
62. The WMS indicates that it aims to tackle the disproportionate burden of developer contributions on small-scale developers, custom and self-builders. Policy H4 proposes a sliding scale of affordable housing delivery, whereby

⁹ This excludes sites where net loss and no unit gains were recorded.

contributions in lieu sought in association with small schemes would involve modest amounts. For example, a scheme of 1 unit would trigger a requirement for 2% affordable housing, equating to a payment in lieu of about £11,000. In this regard the approach recognises the importance of reducing the burden on small developers, and adjusts requirements accordingly. The sums involved also appear modest in the context of high land values and the average price of over £990,000 for a new build home in Camden¹⁰. The Council's evidence also states that the sliding scale was established in order for targets to be achieved in most cases without recourse to viability testing, recognising that this creates significant administrative costs for both developers and the Council.

63. The Council's viability report (CD2.19) and post-hearing note (ED20) shows that the delivery of small schemes in Camden would not be jeopardised by affordable housing contributions at the rates proposed in Policy H4. Policy H4 also establishes a flexible approach, whereby criteria such as the character of the site, site constraints, and the economics and financial viability of the development would be taken into account when negotiating planning obligations. Furthermore, payments in lieu, particularly once completion has taken place, could be less onerous in terms of cash flow and scheme viability than seeking completed units.
64. As national policy I attach significant weight to the WMS and the need to tackle disproportionate financial burdens for small-scale developers. Nonetheless, taking account of the above factors, I consider that there are local circumstances in the case of Camden which, taken as a whole, fully justify a lower affordable housing threshold. There are options relating to the threshold, which the Council has explored. However, having regard to the above factors and the significant proportion of units predicted on small-scale schemes, I consider that a threshold of 1 unit would make a significant contribution to the delivery of affordable housing to meet identified needs, and accordingly is justified. The GLA supports the Council's approach.
65. Overall, having carefully weighed up the issues, I am satisfied that there are specific local circumstances in the case of Camden to justify a departure from national policy, and to support the proposed threshold of 1 or more units. Nevertheless, modifications to the supporting text through **MM21 and MM23** are necessary to provide an update on the national policy position.
66. Policy H4 seeks affordable housing on sites of 25 or more dwellings, with decreasing amounts for smaller developments. The Council's viability testing indicates that the proposed proportions are deliverable across a range of locations and types of sites, notwithstanding the issues relating to high value office sites, as previously referenced. The Council's completions evidence also shows recent strong rates of affordable housing delivery.
67. I therefore consider that the proportion of affordable housing sought through Policy H4 appears justified and capable of delivery. As referred to above, the policy also incorporates some flexibility whereby a range of factors can be

¹⁰ Land Registry for the period February 2015 to February 2016.

taken into account in negotiations on the scale and nature of affordable housing provision.

68. The policy establishes that the proportion of affordable housing sought should be based on development capacity, whereby 100 sqm is considered to provide scope for one home. This threshold allows a large three bedroom affordable property to be secured, in line with identified needs for family housing and priorities in the London Plan. The policy seeks to generally apply this rate, but indicates that any constraints on capacity will be taken into account, for example, associated with a listed building.
69. In some instances a single unit scheme could comprise less than 100 sqm, but the policy does not specify how this would be dealt with. Modifications are therefore necessary to clarify that affordable housing contributions are required from schemes of one or more additional homes which involve at least 100 sqm of additional floorspace (**MM15, MM21**). Linked modifications are also necessary to the supporting text to clarify the Council's development capacity approach and how partial multiples of 100 sqm would be dealt with (**MM21, MM22**). The wording of MM22 in the Council's published Main Modifications, relating to paragraph 3.105, states that payments in lieu may be accepted on sites with capacity for 10 or less dwellings. I have amended this to refer to 'fewer than 10 dwellings' in order to ensure consistency with Policy H4 criterion h and paragraph 3.108.
70. Modification **MM17** clarifies that detailed information on affordable rent tenures sought in Camden would be provided in an accompanying supplementary planning document (SPD). This is important given the differences in viability arising from each type of housing. Other details on the operation of Policy H4 would be included in SPD, including information relating to payments in lieu.
71. Policy H10 seeks to secure new Houses in Multiple Occupation (HMOs) as low cost housing, or the provision of an element of affordable housing. Land and sales prices in Camden are high, and there are identified affordability issues in the borough. The Council's Local Plan Financial Viability Study (2015) shows that both general housing (Use Class C3) and student housing can support an element of affordable housing. Taking account of the above, and the in-built flexibility in Policy H4 regarding negotiations, I am satisfied that the Council's approach is justified and deliverable.

Housing choice and mix

72. Policy H6 includes a requirement that 90% of homes in new development should comply with optional Building Regulation M4(2) relating to accessible/adaptable homes, and 10% with M4(3) relating to wheelchair user dwellings. These provisions are consistent with updated Policy 3.8 in the London Plan. They are also supported by viability testing undertaken through the Minor Alterations to the London Plan¹¹ which shows that base costs would only increase by modest amounts and represent a minimal cost in terms of overall scheme appraisals.

¹¹ GLA Housing Standards Review Viability Assessment (2015) (CD5.7).

73. Additional text is necessary to explain how partial numbers arising from the application of 90% and 10% to development schemes would be dealt with **(MM28)**. This detail on rounding up, along with clarification that wheelchair user housing would accordingly only be sought from schemes of six or more dwellings, is necessary for reasons of effectiveness.
74. The PPG states that Local Plan policies which provide enhanced accessibility or adaptability should only do so by reference to the optional Building Regulations. Criterion d in Policy H6 is contrary to national policy, as it seeks to impose other requirements where full Building Regulations requirements cannot be secured. Accordingly, I recommend the deletion of text and related amendments for soundness reasons (**MM25, MM27** and relevant sections of **MM28**).
75. Regulations relating to the provision of starter homes have yet to be published, following enactment of the Housing and Planning Act. Supporting text to Policy H6 should accordingly be modified to refer generally to the Act and forthcoming Regulations, and to remove the specific references relating to the cost of starter homes and their precise role (**MM29, MM30**). For the same reasons, modifications are necessary to supporting text to Policy H4 (**MM18, MM19**).
76. The NPPF states that local planning authorities should plan for the needs of different community groups, including older people. This is addressed in Policy H8, and specific parts of Policy H6 which require provision for particular housing needs on sites of 0.5 hectares (ha) or more, and accessible homes.
77. Policy H7 seeks the provision of different size dwellings to meet local needs. It establishes a flexible approach which involves taking a wide range of factors into account, including the character of an area.

Traveller accommodation

78. National policy, as set out in Planning Policy for Travellers Sites (2015), requires that local authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address likely accommodation needs in their area.
79. The Council's Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (2014) (CD2.3) (GTAA) identifies a need for an additional 16 gypsy and traveller pitches in Camden between 2013 and 2031. Policy H11 in the Local Plan, however, establishes a need for between 9 and 16 pitches over this period.
80. The Council has indicated that this difference is based on changes in the national definition of gypsies and travellers since production of the GTAA, which now excludes those who have permanently ceased to travel. However, at the hearing the Council confirmed that no further survey work on the local gypsy and traveller population has been carried out. The Council has highlighted recent studies elsewhere which have suggested that fewer travellers now meet the updated national definition. Nevertheless, there is no evidence before me that these figures are necessarily applicable in Camden. I therefore consider that the pitch targets in Policy H11 are not adequately justified or evidenced. Accordingly modifications are needed to remove the

minimum range-based figure, and base the target on the overall need figure in the GTAA (**MM33, MM35, MM36**). Future updates of the GTAA will provide an opportunity to review the pitch targets.

81. The Council is taking a proactive approach to meeting the accommodation needs of gypsies and travellers, and has started the process of identifying and reserving Council-owned sites for this purpose. The forthcoming review of the Council's Site Allocation document will provide an opportunity to identify further traveller sites, and demonstrate that pitch targets and a five year supply of pitches can be met. The phasing targets in Policy H11 differ slightly to those recommended in the GTAA, with fewer pitches sought up to 2021. However, this is based on the fact that part of the assessment period has already passed, and the Council's Site Allocation document is not due to be adopted until 2018.
82. Policy H11 does not establish a target for additional travelling showpeople plots. This approach is supported by evidence in the GTAA which identifies the small size of the local community and a sufficient supply of plots over the Plan period to meet identified needs. If windfall schemes come forward for either plots or traveller pitches, criteria in the policy will enable proposals to be adequately assessed.
83. The requirement for general residential schemes of 0.5 ha or more to provide an element of traveller accommodation appears in Policies H4, H6 and H11. However, the Council has indicated that pitch supply in the short-term is likely to come forward on Council-owned land, and beyond this from sites identified in the forthcoming Site Allocations document. It is therefore not clear whether this additional requirement is necessary. There is also no firm evidence that the development industry would be willing to engage in the process via windfall sites, and in this context there could be associated risks to overall housing delivery. Accordingly, I consider that this provision should be deleted from the three policies through modifications **MM34, MM37, MM16, MM24, MM26, MM31**.

Conclusion on Issue 2

84. Overall I conclude that, subject to the above main modifications, the Plan sets out a positively prepared strategy for delivering housing development to meet identified needs, which is justified, effective, in general conformity with the London Plan, and consistent with national policy.

Issue 3 – Does the Plan set out a positively prepared strategy and policies for the delivery of economic development and jobs, which are justified, effective and consistent with national and local policy?

85. Policy E1 and Policy G1 reflect the findings of the Camden Employment Land Study (2014) (CD2.12) which identifies need for an additional 695,000 sqm net of office floorspace between 2014 and 2031. At the hearing the Council indicated that, as at April 2016, a total of about 25,000 sqm had been completed and some 380,000 sqm of floorspace had outstanding planning permission. Additional delivery of 180,000 to 280,000 sqm is anticipated at Euston. This amount of floorspace will take a number of years to build out.

However, recent permissions point to some buoyancy in the market, and overall I consider the target is deliverable over the Plan period.

86. Policy E2 allows the loss of employment land where it can be demonstrated that premises/sites are no longer suitable and no longer needed for continued business use. The approach is pragmatic and flexible, includes recognition of the condition of buildings, and is in line with the NPPF. Existing businesses may experience difficulties in finding alternative suitable premises, and the Council's evidence highlights a particular need to retain industrial and warehouse uses which support the functioning of the Central Activities Zone (CAZ). As such I consider that the two year marketing period and the emphasis on retaining businesses on-site is justified. The emphasis on the retention of small premises is also justified, given that small and medium sized enterprises (SMEs) employing less than 20 people are the main growth sector in Camden.
87. Policy E2 also allows higher intensity redevelopment of employment sites where the amount of employment floorspace is retained/increased, and other criteria are met. The efficient use of land is in line with policy in the NPPF, and there is no evidence that the approach would unduly affect the supply of land needed in the borough for industrial purposes. The use of employment floorspace is a standard approach and allows authorities to monitor supply against land use needs. Job numbers are referenced in the supporting text as one of the relevant factors that will be taken into account.
88. At the hearing the Council confirmed that this approach would apply to the Kentish Town Industry Area, as well as other business premises/sites across the borough. The Council's evidence indicates there is scope for intensification in parts of the Industry Area whilst retaining the same level of employment floorspace.
89. The requirement for higher intensity redevelopment schemes to include an element of affordable managed workspace for SMEs is justified in the context of the high level of SME growth in the borough, as outlined above. The approach has already been successfully implemented in Camden and a number of other London boroughs, and is an example of positive planning in the context of rising rents and pressures on existing commercial premises from increasing residential land values and other factors. Criterion f also specifically states that affordable managed workspace would only be sought where it is viable. The suggested threshold of 1000 sqm is proportionate as it relates to large-scale major development which is likely to be more capable of supporting an element of affordable managed workspace.
90. Overall I consider that the main part of Policy E2 provides an appropriate level of flexibility which allows scope for some redevelopment whilst protecting employment floorspace which is needed to support business needs and jobs growth in the borough. Nevertheless, in order to be effective, I have recommended a number of modifications, including naming the Industry Area in Policies E1 and E2 (**MM48, MM49, MM54**), confirmation that criterion h is not a requirement in the Industry Area (**MM54**), and alterations to align criteria d and e with the supporting text (**MM50, MM52**). Further details regarding the definition of affordable managed workspace, trigger points and the extent of provision sought are also necessary (**MM53**).

91. Policy E2 seeks to protect the important historic cluster of jewellery manufacture and trading in Hatton Garden, in the context of development pressures and rising rents in the area. However, for reasons of effectiveness modifications are required to clarify the definition of affordable premises (**MM55**) and that '50%' rather than 'up to 50%' additional floorspace would be sought as affordable premises (**MM51, MM55**).
92. Policy E3 seeks to support tourism development and visitor accommodation in Camden. Modifications are necessary to make it clear that large-scale tourism development would be encouraged rather than required to provide training and employ Camden residents (**MM56**), in line with the approach in the supporting text. The definition of large-scale development in the supporting text also needs to be clarified (**MM57**).

Conclusion on Issue 3

93. Overall I therefore conclude that, subject to the above main modifications, the Plan sets out a positively prepared framework for the delivery of economic development and jobs which is justified, effective and consistent with the London Plan and national policy.

Issue 4 – Are the policies relating to community health and well-being positively prepared, justified, effective and consistent with national and local policy?

94. Policy C2 seeks to protect existing community facilities and ensure provision to meet local needs, in line with Policy 3.16 in the London Plan. The policy is pragmatic, however, and the loss of community facilities is permitted in certain circumstances. In order to be effective, modifications are necessary to clarify that where loss of community facilities is permitted, the Council will seek to maximise affordable housing provision within the standard framework provided by Policy H4 (**MM41**). Modification **MM39** is also required to clarify that replacement facilities should meet the needs of current or intended users, as well as the local population.
95. Policy C2 plans positively for new community facilities to support development in the borough, through the use of Community Infrastructure Levy (CIL) monies and Section 106 agreements. However, modifications **MM38, MM40** are necessary to clarify that CIL monies may be pooled and redistributed.
96. The borough has a wide range of cultural and leisure facilities and several important clusters of cultural activities, including Camden Town and part of the West End theatre district. In this context I consider the general strategy in Policy C3 to protect such facilities is justified, and the absence of a recent borough-wide study on cultural facilities is not critical. The criteria in the policy are fair and balanced, cover relevant planning considerations and are clearly expressed. However, modifications are required to clarify that the policy seeks to protect all cultural and leisure facilities (**MM42, MM44**), and that replacement facilities may be appropriate either on-site or elsewhere (**MM43, MM45**).

97. Policy C4 seeks to avoid the loss of public houses and includes a set of criteria which proposals need to satisfy. The approach to Assets of Community Value is in line with its status as a material consideration¹², and the requirement to erect sales boards would help to ensure that the local community is alerted. However, additional flexibility is required to deal with a scenario where, for example, a public house has community value but is not viable, and where change of use may therefore be acceptable. Accordingly, the insertion of options and amendment of text is necessary to ensure the policy is effective **(MM46)**. I also consider that reference to a five year trading period should be removed, as the key issue is whether other suitable operating models could be successfully applied **(MM46, MM47)**.

Conclusion on Issue 4

98. Overall I therefore conclude that, subject to the above main modifications, the Plan's policies in respect of community health and well-being are positively prepared, justified, effective and consistent with national and policy.

Issue 5 – Are the policies for protecting amenity positively prepared, justified, effective and in line with national and local policy?

Open space

99. Policy A2 identifies broad categories of open space in the borough, and proposes different approaches to their protection and enhancement. The policy seeks to protect 'designated' open spaces, whilst land greater than 400 sqm on Council housing estates is safeguarded, albeit allowing some flexibility for re-configuration. The policy states that 'non-designated' open spaces with nature conservation, townscape and amenity value will be protected where possible.
100. The Council's Open Space, Sport and Recreation Study (2014) (CD2.5 and CD2.6) does not include an analysis of all open spaces or clarify how the designated ones were selected. However, it shows that the designated open spaces have high value and perform a range of functions. The Council has confirmed that in many cases the designations date back to the 1970s and 1980s, and the sites have therefore been established as protected open spaces for a considerable period.
101. However, the overall approach in Policy A2 is not consistent with national policy on the protection of open space. Paragraph 74 in the NPPF states that existing open space, sports and recreational building and land, including playing fields, should not be built on unless it can be demonstrated to be surplus to requirements, it would be replaced by an equivalent amount and quality of open space, or alternative sports and recreational provision is proposed that would outweigh loss. Policy A2 does not reference any exceptions in relation to designated open spaces, and does not explicitly protect open spaces less than 400 sqm on housing estates. Furthermore the policy does not require the provision of equivalent or better quantity and quality of open space arising from the reconfiguration of housing estates, and only seeks to protect non-designated open spaces 'where possible'.

¹² WMS dated 26 January 2015.

102. Modifications are therefore necessary to bring Policy A2 in line with national policy (**MM58, MM60, MM62, MM63, MM64, MM65**). This includes provisions to retain open spaces on housing estates regardless of size, and to seek replacement open space which is of equivalent or better quality and quantity. Reference to open space surplus is omitted as I consider that the identified open space deficiencies in parts of the borough, coupled with predicted population increases and significant housing demands, means this exception is unlikely to apply in Camden.
103. The Council's proposed amendments to criterion b iii, as set out in MM58 in the published Main Modifications document (ED36), include reference to affordable housing as an example of benefits that could be weighed against the value of retaining open space. This is not consistent with the aims of the modified policy, as expressed in the first sentence of criterion b and the supporting text, which is to retain open space on housing estates whilst allowing for reconfiguration of open space and other land uses across estates where significant benefits are demonstrated. It is also not an exception within paragraph 74 of the NPPF. I have therefore omitted reference to this example in MM58, in order to ensure consistency and clarity.
104. The Council's Open Space Study (2014) does not provide a full sport demand assessment for playing fields and other sports and recreation facilities in Camden. However, I consider this is not a critical issue given the built-up nature of the borough and the limited prospects for the provision of additional pitches. The Study demonstrates that there is no surplus of provision and highlights the importance of ensuring good quality provision given likely high levels of usage.
105. For reasons of effectiveness, the word 'will' should be substituted with 'may' in the last sentence of criterion m, to reflect the fact that Section 106 agreements involve negotiation between parties (**MM61**). Modifications are also required to explain the dual system of Section 106 agreements and CIL, and to ensure consistency with national guidance on planning obligations (**MM66**).

Biodiversity

106. Policy A3 seeks to protect and enhance biodiversity in the borough. It includes reference to the replacement of trees and vegetation and other ecological improvements, in line with Policy 7.19 in the London Plan and paragraph 118 in the NPPF. Further detail on biodiversity gains is included in the Council's adopted SPD on amenity¹³.
107. Criterion b in Policy A3 indicates that development would be permitted unless it results in the loss or harm to nature conservation sites or species. However, the Plan needs to be read as a whole, and therefore other considerations would apply in the determination of applications. Accordingly, modifications to the criterion are not necessary for reasons of soundness.

¹³ Camden Planning Guidance 6 Amenity (CD4.6).

Basements

108. The borough has experienced an increase in the development of basements as a way of gaining additional space in homes and commercial premises. The Council's evidence¹⁴ shows that basement development can give rise to ground instability and flooding and have significant construction impacts. Policy A5 sets out a criteria-based approach which seeks to address these issues and prevent harm to neighbouring properties and local amenity. Risks associated with basement development are not limited to specific areas of the borough, and therefore a general criteria-based approach is justified. The policy does not address enforcement against inappropriate development, as this is a separate matter falling under different legislation.
109. The policy seeks to avoid harm, but it has been suggested it should be altered to refer to unacceptable harm/impacts or include other qualifications. However, such qualifications would indicate that some level of harm is appropriate, and would weaken the policy. The risks associated with basement developments are well documented, as established in the evidence referred to above. Thus I consider the Council's phraseology is justified. Effects during construction, and the need for Construction Management Plans, are dealt with in the supporting text.
110. Criteria f to m seek to protect local character and minimise the impact of construction on neighbours, and are warranted given the built-up nature of much of the borough and the importance of amenity. I also consider that they are clearly expressed. The Council's evidence shows that basements under homes in predominantly residential areas have the greatest impact, and therefore the application of criteria to smaller scale schemes is justified. There is no firm evidence before me to demonstrate that these requirements, as they apply to smaller-scale schemes, would be unduly onerous or ineffective.
111. Basement Impact Assessments (BIA), Construction Management Plans and Basement Construction Plans are key documents that enable a local authority to assess the potential effects of basement development. These would be sought in certain circumstances, as defined in the policy and the Council's adopted SPD on basements.¹⁵ This approach is pragmatic and recognises that a full assessment may not be necessary in every case; for example in less complex schemes.
112. An independent verification of BIAs is justified given the technical and sensitive nature of the issues involved. It would also be applied flexibly, as described in paragraph 6.116. The cumulative impact of schemes is a key consideration in built-up areas, and accordingly I consider the requirement for a BIA to include details of schemes in the locality is justified.
113. Overall I consider that Policy A5 strikes an appropriate balance between protecting the built environment and local amenity, and facilitating basement development. It establishes a clear list of requirements and assessment

¹⁴ Camden Survey of Basement Development (2016) (CD2.9) and the Camden Geological, Hydrogeological and Hydrological Study (2010).

¹⁵ Camden Planning Guidance 4 Basements and Lightwells (2015).

criteria which contain an appropriate level of detail, with flexibility to include further information in SPD.

114. Nevertheless, given the high degree of community concern surrounding basement development I consider that the policy should include reference to the Council's recommended Burland Scale level, as established in the adopted SPD on basements. The Burland Scale measures the risk of damage to property, and the maximum recommended level of 1 'very slight' is already applied by the Council. Its inclusion would strengthen and clarify the Council's approach, and is justified. Modifications **MM67** and **MM68** are therefore proposed for reasons of clarity and effectiveness.

Conclusion on Issue 5

115. The policies in chapter 6 relating to amenity are clearly expressed, use appropriate terminology, and are supported by additional detail in SPDs. Overall I conclude that, subject to the above main modifications, the Plan's policies for protecting amenity are positively prepared, justified, effective and consistent with national and local policy.

Issue 6 – Does the Plan set out a positive strategy and policies for securing high quality design and protecting and enhancing heritage which are justified, effective and in line with national and local policy?

116. Policy D1 sets out a criteria-based, rather than location specific approach, to the assessment of applications for tall buildings. However, I consider the Council's approach to be suitably precautionary, with a range of requirements that would help to protect the character and heritage of the borough. The policy also provides a clear generic approach to design which avoids undue prescription and is in line with the NPPF. The weight attached to the Council's Character Study, as referenced in the supporting text, would be determined through the application process and take account of its non-SPD status.
117. Policy D2 sets out a positive approach to the protection and enhancement of all aspects of the historic environment. The requirement in criterion h to preserve or enhance is proportionate, recognising that it may not be possible to secure enhancement in all cases. However, a number of main modifications are recommended to Policy D2 and the supporting text in order to strengthen the Council's approach to heritage assets and ensure consistency with national policy (**MM69, MM70, MM71**). Modifications are proposed elsewhere in the Plan for the same reason (**MM02, MM03, MM04, MM59**).
118. Policy D4 seeks to resist advertisements on shop fronts above fascia or ground floor level. This approach is justified on the basis that it would help to reduce urban clutter and light pollution, and protect the character and appearance of a locality, whilst providing an element of flexibility. Overall, Policies D3 and D4 set out a clear, positive and justified strategy to secure high quality shop fronts in the borough and protect local character.

119. The Advertisement Regulations¹⁶ state that factors relevant to amenity include the general characteristics of a locality. I am therefore satisfied that the requirement in Policy D4 for advertisements to 'preserve or enhance' character is justified.

Conclusion on Issue 6

120. Overall I therefore conclude that, subject to the above main modifications, the Plan sets out a positive strategy and policies for securing high quality design and protecting and enhancing heritage which are justified, effective and consistent with national and local policy.

Issue 7 – Are the policies relating to sustainable growth and climate change positively prepared, justified, effective and in line with national and local policy?

Climate change

121. Policy CC1 sets out a range of requirements which seek to minimise the effects of climate change and make development more sustainable. Decentralised energy networks have an important role to play in reducing carbon dioxide, and in this context the requirement for major developments to assess the feasibility of connecting to a decentralised network or establish their own is justified. The approach is also in line with Policy 5.6 in the London Plan.

122. The policy also gives suitable weight to the issue of demolition, recognising the need to explore the retention and improvement of buildings first. Although the policy does not specify the exact floorspace to which this applies, I consider the phrase 'substantial demolition' provides a sufficient framework, with some flexibility to allow proposals to be assessed on a case by case basis.

123. Policy CC1 includes targets relating to energy performance, specifically carbon dioxide reduction. The reduction target of 19% below Part L 2013 Building Regulations broadly equates to Code Level 4, and is therefore consistent with the WMS dated 25 March 2015. The target to achieve 20% reduction through on-site renewable energy generation from schemes of five or more dwellings is justified in the context of London Plan reduction targets and evidence relating to progress, and accords with Policy 5.7 in the London Plan. Viability testing on the Local Plan indicates that the targets are deliverable.

124. Policy CC2 seeks the submission of Energy and Sustainability Statements for schemes of five or more units or more than 500 sqm floorspace. This threshold differs to the threshold in Policy 5.2 in the London Plan which is based on 'major development'. Nonetheless, I note the supporting text to the London Plan states that boroughs are encouraged to require energy assessments for other development proposals where appropriate. Energy and Sustainability Statements are necessary to allow carbon reduction to be measured¹⁷, and the threshold of five reflects those in the aforementioned

¹⁶ The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 as amended.

¹⁷ Having regard to a recent appeal in Camden APP/X5210/W/15/3135102 (CD8.35).

targets. Accordingly, I consider the threshold for seeking Energy and Sustainability Statements, as set out in Policy CC2, to be justified.

125. The March 2015 WMS states that Local Plan policies should not include additional local technical requirements relating to the construction, internal layout or performance of new dwellings. On this basis I consider that the requirement for residential conversions to comply with BREEAM standards, as set out in Policy CC2, is unjustified and contrary to national policy.
126. The policy also seeks BREEAM standards in relation to residential extensions of at least 500 sqm. This is a significant size, and there is no evidence before me that residential extensions of this scale are likely to be commonplace or form a sizable proportion of residential construction in Camden, and the requirement would therefore appear to be unnecessary. It would also cause confusion in cases where conversion schemes incorporate extensions. For the above reasons I therefore recommend that the requirements in Policy CC2 criterion g relating to BREEAM in respect of residential conversions and extensions are amended, and appropriate changes made to the supporting text (**MM72, MM73, MM74, MM75**).
127. Policy CC2 seeks to secure adaptation measures in development. However, the policy incorporates an appropriate level of flexibility which allows the selection of measure(s) to be determined on a case by case basis, and to take account of particular constraints.
128. Both Policies CC1 and CC2 include reference to a number of measures or actions which are 'encouraged' rather than required from developers. However, I consider that these are an appropriate part of the Council's overall strategy to address climate change. They do not impose requirements or standards, and are therefore not in conflict with national policy. Overall, I consider that the policies are clearly expressed, and provide a pro-active framework in line with the NPPF, with further detail in SPD¹⁸. The strategy will operate in conjunction with the Council's Sustainability Plan 'Green Action for Change' which includes non-land use matters.

Water and flooding

129. Modifications to Policy CC3 are necessary for reasons of effectiveness, to clarify that criterion f applies to all basements schemes with habitable rooms, and not just self-contained basement dwellings (**MM76**). This would bring it in line with Policy A5 on basements, and reflect the risks associated with any development in areas prone to flooding. Reference to the Environment Agency's new climate change allowances is also necessary for reasons of effectiveness (**MM77**).

Air quality

130. The effect of proposed levels of growth on air quality in Camden is considered under Issue 1 above. In terms of the specific operation of Policy CC4 itself, modifications are necessary to the supporting text to clarify when Air Quality

¹⁸ Camden Planning Guidance 3 Sustainability (2015) (CD4.3).

Assessments would be required in association with developments that include biomass boilers/combined heat and power (**MM78**).

Conclusion on Issue 7

131. Overall I therefore conclude that, subject to the above main modifications, the policies relating to sustainable growth and climate change are positively prepared, justified, effective and in line with national and local policy.

Issue 8 - Does the Plan set out a positively prepared strategy and policies for viable centres and the provision of shopping facilities, which are justified, effective and in line with national and local policy?

132. At the hearing the Council confirmed that the list of centres in Policy TC1 is not intended to operate as a hierarchy, but that a sequential approach would apply to sites outside designated centres in line with the NPPF. This is currently unclear, and therefore modifications are necessary to Policy TC1 to clarify this position (**MM81, MM82**). Changes are also required to correct the list of Specialist Shopping Areas and clarify their operation (**MM79, MM80, MM82**).

133. Policy G1 establishes that approximately 30,000 sqm of additional retail floorspace is required over the Plan period to meet needs identified in the Council's Retail and Town Centre Study (2013) (CD2.7). The Council's post-hearing note on retail (ED25) indicates that approximately 39% of the overall retail floorspace requirements in the borough have either been completed, gained planning permission or been the subject of an application. Additional supply is anticipated on a number of allocated sites and through windfall development in Camden's designated centres. The number of designated centres in Camden is extensive. Overall I am therefore satisfied that the requirements are deliverable over the Plan period.

134. The Council's adopted SPD on town centres¹⁹ includes specific requirements relating to the proportion and size of retail, non-retail and food, drink and entertainment establishments in centre frontages. However, the PPG states that SPD can build on and provide further guidance on policies in the development plan, and therefore, by definition, should not be used to make policy itself. Therefore, in order to accord with national policy and to be effective, I consider that modifications are necessary to include details of frontage controls within the Plan rather than SPD (**MM83, MM84, MM85, MM91**). The proportions and uses currently defined in the Council's SPD is supported by evidence in the Council's Retail and Town Centre Study (2013) (CD2.7). On-going monitoring will ensure that these proportions and uses, and the boundaries of designated centres, are kept under review.

135. Criterion c in Policy TC2 seeks to focus food, drink and entertainment uses in the King's Cross and Euston Growth Areas, town centres and Central London Frontages. This appears appropriate having regard to the role of these centres, as defined in Policy TC1 and the Council's SPD on town centres. I consider that widening the categories to include the CAZ is not justified, as the CAZ includes locations which have a distinct residential character.

¹⁹ Camden Planning Guidance 5 Town Centres, Retail and Employment (2013).

136. The Council's evidence shows some increase in betting shops, payday loan shops and pawnbrokers in Camden since 2007. However, the rise in betting shop numbers in particular has been relatively modest, and the evidence does not show extensive numbers of clusters in the borough. There is also little Camden-specific information before me to demonstrate that concentrations of these uses are having a significant adverse effect on the vitality and viability of centres. As such it is unclear that 'saturation levels' have been reached 'where negative impacts outweigh benefits', in line with guidance in the Mayor for London's Town Centres SPG (2014) (CD5.14).
137. The Council's approach in Policy TC4 would limit betting shops, payday loan shops and pawnbrokers to one within 400 metres. There is no clear evidence before me that a grouping of two such uses within this distance would amount to a cluster or saturation or cause significant adverse effects on vitality and viability or in other regards. The approach would also capture areas outside centres and extend over a considerable portion of developed parts of the borough.
138. Policy 4.8 in the London Plan promotes the management of clusters of retail uses. Nevertheless, overall, I consider that the Council's approach to betting shops, payday loan shops and pawnbrokers in the last section of Policy TC4 is not adequately justified or in line with national and local policy. Accordingly, I recommend deletion of these requirements through modification **MM86**.
139. However, in the context of Policy 4.8 and the need to promote a mix of uses in town centres, I consider that the general reference in the supporting text to proliferation should be retained. I also consider that the general reference in the supporting text to community safety and fear of crime is appropriate, on the basis that these are valid planning issues that may or may not arise.
140. Policy TC4 also resists the development of hot food takeaways within 400 metres of secondary schools. The Council has drawn my attention to a study by the London Borough of Brent on 'Takeaway Use among Brent's school students' (2014) (CD8.38), and cited a number of other national and international studies relating to the use of hot food takeaways near schools. Nevertheless, there is no Camden-specific evidence before me that demonstrates a causal link between A5 uses and childhood obesity/eating habits in relation to the proposed 400 metre zone around secondary schools. I also note that the proposed zones would cover the majority of the Euston Growth Area and a significant proportion of the King's Cross Central London Frontage. These areas are identified as a key focus for growth in the Plan, and therefore the effectiveness of the policy is unclear.
141. The health impacts of development are relevant planning considerations, as established in the NPPF. Nevertheless, for the reasons above I consider there is insufficient evidence before me to support the Council's approach in Policy TC4 to hot food takeaways. Accordingly, I recommend that the last section of criterion f is deleted and related changes made to the supporting text **(MM87)**.
142. The Council recognises the challenges of managing the competing needs of residents and other visitors in Camden Town, and identifies a suitable framework for addressing this matter. This includes the identification of

'sensitive frontages' where there are tighter controls on food, drink and entertainment uses. Policy TC6 also provides general protection for Camden market and other markets, with detailed matters of management necessarily being dealt with outside the local plans system.

Conclusion on Issue 8

143. Overall I therefore conclude that, subject to the above main modifications, the Plan sets out a positive strategy and policies for viable centres and the provision of shopping facilities which are justified, effective and in line with national and local policy.

Issue 9 - Does the Plan set out a positively prepared strategy and policies on transport, which are justified, effective and in line with national and local policy?

144. The public transport section of Policy T1 refers to bus infrastructure, and needs to be widened to capture other forms of public transport. Modifications **MM88 and MM89** are therefore required for reasons of clarity and effectiveness.

145. Policy T2 requires all new development in the borough to be car-free. This approach is supported by evidence in the Council's Car Free Report (CD2.10) which identifies high levels of public transport accessibility in Camden, and good access to jobs and services. The Council's viability testing indicates that such development is deliverable. The approach is also in line with Policy 6.13 in the London Plan, which allows boroughs to determine their own standards based on specific circumstances, and to explore car-free housing in locations with high public transport accessibility.

146. However, in relation to existing town centre carparks some flexibility is necessary to allow either the retention or some re-provision of parking in redevelopment schemes, recognising the important role that such carparks play in supporting town centre vitality and viability. Accordingly, for reasons of effectiveness, modifications are necessary to alter paragraph 10.20 (**MM90**).

147. In general I consider that the transport strategy and policies in the Local Plan are clearly expressed, contain an appropriate level of detail, and avoid undue prescription. Overall, they provide a positively prepared framework for promoting sustainable travel and reducing car use, thereby benefiting air quality and health and well-being. Subject to the above main modifications, the framework is justified, effective and consistent with national and local policy.

Other Matters

148. Land at Gondar Gardens is shown as open space on the Local Plan Policies Map. Representations have been made late in the examination process, indicating that the boundaries are incorrect, and that part of the site has outstanding planning permission for development and should accordingly be omitted. I note that this issue was considered by the Examiner for the Fortune Green and West Hampstead Neighbourhood Plan, and it was recommended that the boundaries should take account of outstanding

permissions. The representations state that this has not been wholly reflected in the Neighbourhood Plan maps. The matter was considered as part of the Neighbourhood Plan process and derives from this document, and the Council has confirmed that it is dealing with the issue on this basis. Any subsequent amendments to the maps in the Neighbourhood Plan would need to be reflected in due course in revisions to the Local Plan Policies Map.

Assessment of Legal Compliance

149. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Camden Local Plan has been prepared in accordance with the Council's LDS (January 2016).
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2011. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report (2015) sets out why AA is not necessary. Natural England support this.
National Policy	The Camden Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Camden Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

150. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

151. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Camden Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

Katie Child

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed in the conventional form of ~~strikethrough~~ for deletion and underline for additions of text.

The page numbers and paragraph numbering below refer to the submission Camden Local Plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM01	7	1.4	<p>Include additional text as follows:</p> <p><u>'Camden Sites Allocation – this identifies known development sites in Camden's main growth area and other locations across the borough and sets out the Council's expectations for them. It was adopted by the Council in 2013 and will be fully reviewed following adoption of the Local Plan.'</u></p>
MM02	25	2.26	<p>Amend bullet 7 as follows:</p> <ul style="list-style-type: none"> • protect and enhance features <u>and assets</u> of historic and conservation importance; and
MM03	27	2.29	<p>Amend bullet 4 as follows:</p> <ul style="list-style-type: none"> • development of the highest quality as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and <u>conserve</u> preserve the <u>significance of heritage assets such as the</u> character and appearance of conservation areas; and
MM04	28	2.31	<p>Amend bullet 11 as follows:</p> <ul style="list-style-type: none"> • high quality, sustainable design that respects its surroundings and <u>conserves</u> preserves and enhances the area's <u>heritage assets and wider</u> historic environment; and
MM05	43	After para 3.5	<p>Insert new paragraph 3.5A as follows:</p> <p><u>3.5A Self-contained houses and flats are defined as homes where all the rooms, including the kitchen, bathroom and toilet, are behind a door that only one household can use (2011 Census Glossary of Terms). In most cases these homes fall in Use Class C3, however the Council will also regard the following as self-contained homes when applying Local Plan policies and monitoring housing delivery:</u></p> <ul style="list-style-type: none"> • <u>self-contained homes provided in conjunction with another use, notably live/ work units (homes with a dedicated work area), which are usually considered to be sui generis (in a class of their own); and</u> • <u>small houses in multiple occupation (Use Class C4), which</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>can change to Use Class C3 without a planning application under the freedom provided in legislation. Where the freedom to change to Use Class C3 has been removed (e.g. by a planning condition), the Council will regard small houses in multiple occupation as non self-contained housing.</u></p>
MM06	44/45	3.8 – 3.10	<p>Amend paragraphs 3.8 to 3.10 as follows:</p> <p>3.8 The Council produces an Authority Monitoring Report (AMR) each year which separately monitors the overall delivery of additional homes and different types of homes each year (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 targets. <u>The Council has produced a new housing trajectory to show how the Plan will meet the full objectively assessed housing need, and this is included in the Local Plan as Appendix 4. In accordance with the NPPF, the trajectory adds a 5% buffer to housing targets during the first five years, which is moved forward from later years. The trajectory therefore adopts an annual target of 1,176 additional homes for the period 2016/17 to 2020/21, and an annual target of 1,092 for the period 2021/22 to 2030/31.</u></p> <p>3.9 The 2014 AMR housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets in the early years of throughout the Plan period. but not in the later years. Deliverable sites are in place to provide more than 6,500 <u>7,100</u> homes from 2015/16 to 2019/20 <u>2016/17 to 2020/21</u>, approximately <u>1,420</u> additional homes per year, comfortably exceeding Camden's overall housing the target (including 5% buffer) of 1,120 <u>1,176</u> per year (deliverable sites are sites that are suitably located, viable and available to develop now, and that have a realistic prospect of delivery within five years). Over the first 10 years of the Plan period, the trajectory indicates that developable sites have been identified to deliver an average of around 900 <u>1,150</u> additional homes per year, and over the entire plan period identified sites should deliver just under 800 <u>1,140</u> additional homes per year (developable sites that are suitably located and have a reasonable prospect of being viable and available to develop at the time envisaged). We are working to reassess the potential of sites across the borough to ensure that we exceed the housing target right through the Plan period.</p> <p>3.10 <u>We will update the housing trajectory regularly to take into account new sources of supply and maintain a five-year supply of deliverable sites together with a 5% buffer, and will publish the updated trajectory in future Authority Monitoring Reports.</u> anticipate that the shortfall later in the Plan period will be met by higher density development and intensification of the existing built environment, and delivery</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>of additional housing from sites identified in the London Strategic Land Availability Assessment (SHLAA) 2013, town centres, and Growth Areas such as Kentish Town Regis Road and Euston, 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.</p>
MM07	46/47	3.16	<p>Amend text as follows:</p> <p>3.16 The 2011 Census indicated that Camden has over 220,000 usual residents. Of these, almost 8,000 live in communal establishments, <u>and just under 5,400 live as separate households in shared dwellings,</u> and 40,000 live in multi-adult households such as groups of friends and flat-shares. This leaves three quarters <u>Over 90%</u> of Camden's usual residents who live in self-contained homes as part of a household of related people or as single person households <u>(self-contained houses and flats are defined in paragraph 3.5A of the Local Plan). Usual residents of self-contained homes include 40,000 people living in multi-adult households such as groups of friends and flat-shares (18% of all usual residents). In many cases these residents are not related to the other occupiers of their home, so although they currently live in self-contained homes they could potentially live in non self-contained housing in the future.</u></p>
MM08	53/54	Policy H2	<p>Amend Policy H2 as follows:</p> <p><u>'To support the aims of Policy H1, The Council will seek to exceed the target for self-contained homes by expecting where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of</u> to provide a mix of uses including the maximum appropriate provision of self-contained housing.</p> <ul style="list-style-type: none"> • <u>In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.</u> • We will particularly expect sites in <u>In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road</u> 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 (GIA), we will require up to 50% of all additional floorspace to be self-contained housing, subject to the following considerations. <p><u>In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:</u></p> <ol style="list-style-type: none"> <u>a. the character of the development, the site and the area;</u> <u>b. site size, and any constraints on developing the site for a mix of uses;</u> <u>c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and</u> <u>e. whether the development is publicly funded or serves a public purpose.</u></p> <p><u>Where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sq m (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing housing in association with the development is appropriate but on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.</u></p> <p><u>In considering whether to seek a mix of uses including housing should be provided on site, and the most appropriate mix of uses, and the scale and nature of any provision of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:</u></p> <p><u>a. the character of the development, the site and the area;</u> <u>b. site size, and any constraints on developing the site for a mix of uses;</u> <u>c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;</u> <u>d f. the need to add to community safety by providing an active street frontage and natural surveillance;</u> <u>e. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;</u> <u>f g. the extent of any additional floorspace needed for an existing user;</u> <u>g. whether the development is publicly funded or serves a public purpose;</u> <u>h. the impact of a mix of uses on the efficiency and overall quantum of development;</u> <u>i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and</u> <u>j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.</u></p> <p><u>In the Central London Area and the town centres listed in this policy, where provision of self-contained housing is appropriate required but the development's provision of housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution. The deferred contribution will based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible.'</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM09	54	3.43 – 3.45	<p>Amend paragraphs 3.43 to 3.45 and insert new paragraph 3.45A, as follows:</p> <p>3.43 <u>'Policy H1 indicates that where sites are underused or vacant, we will expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site.</u> 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.....'</p> <p>3.44 'Much of the borough already has a well-established mixed-use character. To support <u>this mixed-use character and the aims of Policy H1</u> and extend this, the Council will expect <u>encourage</u> non-residential development throughout the borough to provide a mix of uses including the maximum appropriate contribution to self-contained housing.'</p> <p>3.45 <u>'The Council has established detailed requirements for non-residential development in Camden's Central London Area and the town centres of Camden Town, Finchley Road/Swiss Cottage and Kilburn High Road, as these</u> 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 <u>require</u> development schemes in Central London and our <u>these</u> larger town centres to provide a mix of uses <u>subject to the considerations set out in Policy H2</u>, and will seek to negotiate up to half of all additional floorspace as <u>self-contained</u> housing (in Use Class C3), such that additional floorspace in residential use matches all the additional floorspace in non-residential uses.'</p> <p>3.45A <u>'For the Central London Area and the specified town centres, Policy H2 provides distinct considerations and criteria used to determine whether a development is required to provide housing as part of a mix of uses, the type of housing required, whether the housing should be provided on site or off site, and achieving an appropriate mix of housing and other uses. The following paragraphs explain these in turn. Further details of the operation of Policy H2 are also set out in supplementary planning document Camden Planning Guidance 2: Housing.'</u></p>
MM10	55	3.46	<p>Amend paragraph 3.46 and insert new paragraph 3.46A as follows:</p> <p>3.46 <u>Proposals for additional non-residential floorspace in the Central London Area and specified town centres will be required to provide housing subject to assessment against criteria (a) to (e) in Policy H2. The Council has set a</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>threshold indicating that the requirement applies to developments adding more than 200 sqm (GIA or gross internal area) 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. [final sentence moved to para 3.48A]</u></p> <p><u>3.46A The following are examples of proposals that would not be required to provide housing:</u></p> <ul style="list-style-type: none"> • <u>the additional floorspace is 200 sq m (GIA) or less;</u> • <u>the development is unable to create an acceptable level of residential amenity e.g. inadequate daylight and sunlight, or other activities nearby would cause unacceptable harm to residential amenity e.g. levels of noise and vibration;</u> • <u>the development involves an extension to an existing building (especially a listed building or a building that makes a positive contribution to a conservation area) that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts;</u> • <u>the development is in the designated Hatton Garden area, where the Council's priority is to secure and protect a stock of premises for the jewellery sector and support the nationally important cluster of jewellery manufacture and trading that gives the area its special character;</u> • <u>the development involves a specialised use, such as a hospital or a research facility, which has operational requirements that prevent the inclusion of housing (e.g. 24 hour activity or a controlled environment); or</u> • <u>the development is publicly funded or serves a public purpose (such as providing transport infrastructure, land required for transport, or a dedicated facility for an educational, medical or research institution), and the nature of the funding or facility prevents the inclusion of housing. [this point moved from para 3.62]</u>
MM11	55	3.48	<p>Amend paragraph 3.48 and insert new paragraphs 3.48A and 3.48B as follows:</p> <p>3.48 'Where Policy H2 does apply <u>applies</u> to development, the Council will generally seek self-contained housing (in Use Class C3). This is consistent with the with the Council's concern that development of student housing.....'</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>3.48A To ensure that housing provided as part of a mixed use scheme contributes to meeting the targets identified in Policy H1, rather than being used as ancillary space by non-residential occupiers, the homes 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.</u></p> <p><u>3.48B Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought. Policy H4 sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect.</u></p>
MM12	55-57	3.49 – 3.52 and 3.54-3.55	<p>Amend section title and paragraphs 3.49 to 3.55 as follows:</p> <p><u>Appropriateness of seeking housing and on-site provision Whether the housing should be provided on site or off-site</u></p> <p>3.49 Where Policy H2 applies to a development the Council will initially consider whether it is appropriate to seek housing in association with the development. Key factors will be the character of the area and whether another use has priority (i.e. jewellery in Hatton Garden), community safety, the compatibility of self-contained housing with proposed and nearby uses, and whether the development serves a public purpose (criteria a, c, d, e and g). A development of 200 sqm (GIA) is considered the minimum size that can reasonably accommodate one or two homes together with a non-residential activity, so provision of housing will not be sought from non-residential developments of less than 200 sqm (GIA).</p> <p>3.50 Inclusion of self-contained housing <u>on-site</u> as part of a mixed use development offers the best prospect for <u>achieving the benefits set out in paragraph 3.43 and creating a complementary range of activities across an area with continuous activity and natural surveillance.</u> Where the Council considers that provision of housing is appropriate, we will seek provision on the development site. Where development adds 1,000 sqm (GIA) or more floorspace, the Council considers that it will generally be possible to achieve a significant number of homes on-site together with <u>sufficient to support the stairs, lifts and circulation space</u> needed to serve them, and will therefore particularly expect on-site provision.</p> <p>3.51 However, There may be circumstances (even when the additional floorspace is 1,000 sqm or more) where the provision of housing is appropriate but cannot practically be achieved on-site <u>or would more appropriately be provided off-site</u> (for example where the entire <u>additional</u> floorspace is needed for an existing user). <u>Relevant considerations are set out in paragraphs 3.52 to 3.60.</u> Where the Council considers that <u>off-site provision</u> it is appropriate to seek</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>housing in association with the development but accepts that on-site provision is not practical, we will seek an off-site contribution to affordable housing this will be secured through a planning obligation.....'</p> <p>3.52 'Where the Council accepts that on-site provision is not practical <u>For off-site provision,</u> we will assess how much housing is required by looking at all sites involved in the arrangement... '</p> <p>3.54 'Exceptionally, where the Council considers that provision of housing is <u>required appropriate</u>, on-site and off-site options have been thoroughly explored.....'</p> <p>3.55 More detailed information regarding the calculation of off-site provision and payments in lieu is provided in our supplementary planning documents Camden Planning Guidance 2: Housing <u>and Camden Planning Guidance 8: Planning Obligations.</u></p>
MM13	57-59	3.56 - 3.63	<p>Amend section title and paragraphs 3.56 – 3.60 as follows:</p> <p>Achieving an appropriate mix of <u>housing and other uses</u></p> <p>3.56 <u>Where housing is required as part of a mix of uses, all criteria in Policy H2, provides a set of criteria including criteria (a) to (e), will be used</u> to help us consider the appropriate mix of <u>housing and other uses</u> for a site, and whether self-contained <u>the</u> 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 supplementary planning document Camden Planning Guidance 2: Housing (including the assessment of financial viability), but a number of key considerations are set out below.</p> <p>3.57 The character of a development, site and an <u>an</u> area and existing uses in the area and on the site may <u>influence the mix of uses that is most appropriate (including site size)</u> 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.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>3.58 In some areas <u>it may be necessary to strike a balance between</u> the need to meet the space requirements of a particular activity or user <u>may outweigh and</u> 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, and their needs will be given significant weight. The Council supports the institutions and activities that comprise the Knowledge Quarter in the general area of King's Cross, Euston Road and Bloomsbury, such as the Wellcome Institute and the various components of the University of London, and their requirements may be foremost in particular locations.'</p> <p>3.59 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.</p> <p>3.60 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, <u>and seek to ensure that they can expand without relocating, and way the development will be financed.</u> Where a development is publicly funded or serves a public purpose (such as a dedicated facility for an educational, medical or research institution), we will consider whether this would prevent the developer from funding the supply of housing. Where a commercial development is proposed, we We will also 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 including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as build-to-let housing). We will generally 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. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. Where the proposed contribution to</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>affordable housing falls significantly short of the Policy H2 target or the appraisal raises doubts about the deliverability of the development, the Council may also seek an independent verification of the appraisal funded by the developer.</p> <p>Insert new paragraphs 3.60A and 3.60B as follows:</p> <p><u>3.60A 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. [moved from 3.62]</u></p> <p><u>3.60B In negotiating the appropriate mix of uses, the Council will consider all aspects of financial viability including particular costs associated with the development and the distinctive viability characteristics of particular development sectors (such as build-to-let housing). We will generally 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. The Council supports transparency in decision making, and will seek the maximum reasonable disclosure of information in viability appraisals, having regard to any elements that are commercially sensitive. Where the proposed contribution to affordable housing falls significantly short of the Policy H2 target or the appraisal raises doubts about the deliverability of the development, the Council may also seek an independent verification of the appraisal funded by the developer. [moved from 3.60]</u></p> <p>Amend paragraph 3.61:</p> <p>3.61 'In the Central London Area and the town centres listed in Policy H2, where provision of self-contained housing is appropriate <u>required</u> but financial viability constraints prevent a development from meeting the 50% housing target.....'</p> <p>Delete paragraph 3.62:</p> <p>3.62 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. [moved to</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>paragraph 3.60A]</p> <p>Delete section title and paragraph 3.63:</p> <p>Affordable housing in mixed-use schemes</p> <p>3.63 Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought. Policy H4 sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect. [moved to paragraph 3.48B]</p>
MM14	64	Policy H4	<p>Amend first sentence of Policy H4 as follows:</p> <p>'The Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,565 <u>5,300</u> additional affordable homes from 2015-2030 <u>2016/17 – 2030/31</u>, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing....'</p>
MM15	64	Policy H4	<p>Amend second paragraph of Policy H4 as follows:</p> <p>'We will expect a contribution to affordable housing from all developments that include housing and provide one or more additional homes <u>and involve a total addition to residential floorspace of 100 sqm GIA or more.</u> The Council will.....'</p>
MM16	65	Policy H4	<p>Delete criterion g:</p> <p>g. for developments with a site area of 0.5 ha or greater, the Council may seek affordable accommodation for Camden's established traveller community as part or all of the affordable housing contribution, subject to the requirements of Policy H11 (Accommodation for Travellers).</p>
MM17	67	3.88	<p>Amend text as follows:</p> <p>'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. <u>Detailed information on the mix of affordable tenures and rent levels sought in Camden are included in our supplementary planning document Camden Planning Guidance 2: Housing. Following adoption of the Local Plan, the Council will consult on revised Camden Planning Guidance, taking into account the GLA Funding Guidance for London Affordable Rent and the finalised version of the Mayor's Affordable Housing and Viability SPG, which will provide detail on the preferred mix of tenures for each borough and information on where the latest benchmark rents can be found.</u> However, the Camden Affordable Rent Study 2011 indicates 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 (with 3 or more bedrooms) at or around the level of guideline</p>

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			targets for social rents as resources and development viability permit.'
MM18	67	3.89	Amend text as follows: 'The government is introducing <u>Housing and Planning Act 2016</u> provides for the introduction of Starter Homes as a way to help first-time buyers <u>who are at least 23 years old but not yet under 40</u> to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and <u>are subject to a price cap</u> (in London <u>the price cap has initially been set at they should cost no more than £450,000</u> , (based on the average price paid by a first-time buyer). Starter Homes in Camden are likely to cost more than renting in the private sector, so they would not fall within the current definition of affordable housing.'
MM19	67	3.90	Amend text as follows: 'The government is considering measures <u>has consulted on proposed Starter Homes Regulations and changes to the National Planning Policy Framework (NPPF)</u> that would <u>allow developers to require certain types of development to include a set percentage of Starter Homes in development as an alternative to and broaden the definition of affordable housing to include homes sold for discount market sale.</u> Where Starter Homes are substituted for affordable housing in development proposals, the Council will expect them to replace affordable home ownership products (primarily shared ownership), and will seek to ensure that proposals continue to include some affordable homes for rent (social affordable rent or intermediate rent). <u>When the Starter Homes Regulations and amended NPPF are published, the Council will consider their impact on policies relating to affordable housing, provide guidance in our supplementary planning documents, and propose changes to the Local Plan if necessary.</u> Starter Homes are considered further in Policy H6 of the Plan and supporting paragraphs.'
MM20	67/68	3.93	Amend text as follows: '..... To set a target for affordable housing we have considered <u>estimated</u> the level of provision likely to be viable and deliverable, taking into account the relationship between development costs, the value of market and affordable homes, the government's intention to focus housing subsidy on boosting home ownership, 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 <u>meet a secure 50% of the self-contained housing target as affordable homes, which equates to our strategic target of 5,565 5,300</u> additional affordable homes over the Plan period.'

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MM21	68	3.95 3.96	<p>Amend text as follows:</p> <p>3.95 The government issued guidance in 2014 creating a national affordable housing threshold and advising that councils should not seek affordable housing from developments involving 10 homes or less, or 1,000 sqm or less. <u>Following legal challenges, this guidance was confirmed in 2016. The High Court has subsequently quashed the guidance, but the government has said it will seek to reinstate the threshold.</u></p> <p>3.96 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. The Camden Local Plan Viability Study shows that there is no direct correlation between scheme size and viability, and there is no viability basis for an affordable housing threshold or a lower target for smaller schemes. <u>Through the Local Plan process, the Council has made provision for the Local Plan to seek affordable housing from smaller schemes as an exception to the national threshold. The Council has therefore devised an Policy H4 therefore sets out:</u></p> <ul style="list-style-type: none"> • <u>an affordable housing threshold of one or more additional homes involving a total addition to residential floorspace of 100 sqm GIA or more; and</u> • <u>affordable housing targets based on a sliding scale which will apply to any proposal involving one or more additional homes and a total addition to residential floorspace of 100 sqm GIA or more.</u> <p>The sliding scale has been set to achieve the maximum reasonable contribution overall without deterring development, causing delays to decision-making, increasing the burden of financial viability appraisals, or (if the national threshold is reinstated) risking creation of a high starting target that supresses scheme or dwelling size. <u>More information about the operation of the sliding scale is provided in paragraphs 3.103 to 3.107.</u></p>
MM22	70/71	3.104 and 3.105	<p>Amend paragraphs 3.104 and 3.105, and insert new paragraph 3.104A as follows:</p> <p>3.104 For schemes which involve one or more additional homes, we will assess their overall capacity for additional homes, starting from the proposed addition to floorspace. Having regard to the nationally described space standard (London Plan Table 3.3), we will generally assess an additional 100 sqm GIA residential floorspace as having capacity for one additional home. A development is able to provide a mix of large and small homes consistent with Policy H7 whilst complying with the space standard and achieving an average of 100 sqm GIA per home. However, we will take into account any constraints on capacity where existing buildings are converted (particularly Listed Buildings and other heritage assets), or where ancillary residential</p>

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			<p>space would be unable to provide dwellings (e.g. due to lack of natural light). In order to avoid deterring small extensions to existing residential blocks and or distorting the size of dwellings within them, we will not seek an affordable housing contribution from developments that involve less than 100 sq m of additional residential floorspace, including:</p> <ul style="list-style-type: none"> • schemes that involve the subdivision of existing housing to create more homes; • schemes that provide one home of 90 sqm GIA; and • schemes that provide two homes of 45 sq m GIA each. <p>3.104A <u>A development is able to provide a mix of large and small homes consistent with Policy H7 whilst complying with the space standard and achieving an average of 100 sqm GIA per home. We will therefore assess the capacity for additional homes on the basis of multiples of 100 sq m GIA, rounding the additional residential floorspace to the nearest 100 sq m GIA so the assessed capacity will always be a whole number. An additional 1,200 sq m GIA will generally have capacity for 12 homes, an additional 1,800 sq m GIA will generally have capacity for 18 homes, and an additional 2,400 sq m GIA will generally have capacity for 24 homes. However, we will take into account any constraints on capacity where existing buildings are converted (particularly Listed Buildings and other heritage assets), or where ancillary residential space would be unable to provide dwellings (e.g. due to lack of natural light). The assessed capacity for additional homes will be used to determine the percentage affordable housing required in accordance with sliding scale set out in Policy H4 criteria (d) and (e) and paragraph 3.106. [partly moved from 3.104]</u></p> <p>3.105 <u>'We will apply affordable housing targets on the basis of seeking sliding scale directly to the specified percentage of additional proposed addition to residential floorspace rather than to the number of homes or 'units' or the capacity for additional homes. We will use the affordable housing targets to seek a proportion of the proposed addition to residential floorspace as on-site affordable housing, except in the case of proposals with capacity of fewer than 10 additional homes where we may accept a payment in lieu of affordable housing (see paragraph 3.108). The use of floorspace in negotiation.....'</u></p>
MM23	71	3.107	<p>Delete paragraph 3.107:</p> <p>3.107 The government is likely to reinstate a national affordable housing threshold at around 10 homes/ 1,000sq m. For schemes where there is no existing housing, the effect of such a threshold on Camden's sliding scale would be that the starting contribution would be around 20%. The remaining part of the sliding scale would serve to ease the distorting effect of the affordable housing threshold. If the Council adopted a flat-rate affordable housing target of 50%, very few developments slightly above the threshold would be delivered as a scheme with nine homes (all for market sale) would usually have a higher value than a</p>

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			scheme with twelve homes (only six homes for market sale or approximately 600 sq m GIA):
MM24	73/74	3.115 and 3.116	<p>Delete paragraphs 3.115 and 3.116:</p> <p>3.115—As indicated in Policy H11 (Accommodation for Travellers) and supporting paragraphs, the Council has identified a need for up to 16 additional pitches for Camden’s established traveller community over the Plan period. The Council anticipates that the pitches or alternative accommodation needed in the early part of the Plan period will be made available from land in the Council’s ownership, but that provision in later years should form part of larger development sites. National planning policy for traveller sites indicates that councils should promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. Consequently, Policy H6 (Housing Choice and Mix) seeks the inclusion of traveller accommodation (private or affordable) as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale. Schemes with a site area of 0.5 ha or greater as such schemes offer the best potential to secure an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development under Policy H1 (Maximising Housing Supply).</p> <p>3.116—In some cases we may seek affordable traveller accommodation and forego private accommodation, depending on the resources available to the community. Any accommodation for travellers is likely to be a relatively low density and low value use, and the inclusion of affordable accommodation would be expected to have a substantial impact on viability. We therefore recognise through Policy H4 that affordable accommodation for travellers would be provided in place of some or all the affordable housing we would otherwise seek to meet general needs. In considering whether affordable traveller accommodation should be sought and the scale and nature of provision, the Council will also take into account all relevant criteria in Policy H4 and Policy H11.</p>
MM25	80	Policy H6	<p>Amend criteria a-d, as follows:</p> <p>‘.....We will seek to secure high quality accessible homes in all developments that include housing. We will:</p> <p>a. encourage design of all housing to provide functional, adaptable and accessible spaces;</p> <p>a b. expect all self-contained homes to meet the nationally described space standard;</p>

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			<p>b c. require 90% of new-build <u>self-contained</u> homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); <u>and</u></p> <p>e d. require 10% of new-build <u>self-contained</u> homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3). and</p> <p>d. where the full requirements of Building Regulation M4(2) and M4(3) cannot be secured, seek design of 10% of homes in each development to meet M4(3) requirements as far as possible, and for any homes in the development that are not broadly consistent with M4(3), seek design to meet M4(2) requirements as far as possible.'</p>
MM26	80	Policy H6	<p>Amend criterion j and the preceding paragraph as follows:</p> <p>'.....Where housing is proposed as part of development with a site area of 0.5 ha or greater, we will expect the development to make provision for particular housing needs. For such sites, the Council will particularly seek to address the need for serviced plots available to people wishing to build their own homes and accommodation for Camden's established traveller community, but may also support the inclusion of housing for older people or vulnerable people, student housing, or other housing with shared facilities. In considering the scale and nature of provision for particular housing needs that would be appropriate, the Council will take into account:</p> <p>j. criteria in Policies H8, H9, <u>and H10</u> and H11 where applicable; ...'</p>
MM27	81	After para 3.138	<p>Add a new paragraph after 3.138, as follows:</p> <p><u>3.138A London Plan Policy 3.5 indicates that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose and meet the changing needs of Londoners over their lifetimes. The Local Plan therefore encourages design of all new housing to provide functional, adaptable and accessible spaces. In addition, the Local Plan applies specific space standards to all proposals for new self-contained homes, and applies specific accessibility requirements to all proposals for new-build homes that are self-contained, as set out in the following paragraphs.</u></p>
MM28	83/84	3.149 and 3.151	<p>Amend text as follows:</p> <p>3.149 Where optional Building Regulations cannot be applied in full, we will encourage developers to meet requirements as far as possible. In such cases, we will encourage design of 10% of homes to meet M4(3) requirements as far as possible. For any homes in the development where it is not possible to achieve a design that is broadly consistent with M4(3), we will seek their design to meet M4(2) (accessible and adaptable dwellings)</p>

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			<p>as far as possible. Where optional Building Regulations cannot be secured in full by planning conditions, we may seek to use planning obligations to secure features that enhance the accessibility of the housing proposed. In applying the requirement for 90% M4(2) accessible and adaptable dwellings and 10% M4(3) wheelchair user dwellings, the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%. The Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.</p> <p>3.151 <u>In the market and intermediate sectors, we will use planning conditions to secure wheelchair user dwellings that comply with Part M4(3)(2)(a) requirements for "wheelchair adaptable" dwellings.</u> Households that include a wheelchair user are much more likely to occupy social rented housing than other tenures, and the waiting list for wheelchair user dwellings far exceeds supply. In the case of social-affordable rented housing, future occupiers can be nominated from the Housing Register (waiting list), and from transfer lists. The Council will therefore require 10% of social-affordable rented housing in each development to be "wheelchair accessible" and be fully fitted-out for occupation by a household containing a wheelchair user. We will use planning conditions to specify those social-affordable homes that must comply with Part M4(3)(2)(b) requirements for "wheelchair accessible" dwellings.</p>
MM29	85	3.161	<p>Amend text as follows:</p> <p>'The government is introducing Housing and Planning Act 2016 provides for the introduction of Starter Homes as a way to help first-time buyers who are at least 23 years old but not yet under 40 to buy their own home at a discount price. Starter Homes should be offered at a discount of at least 20% below market value, and are subject to a price cap (in London the price cap has initially been set at they should cost no more than £450,000, (based on the average price paid by a first-time buyer). Starter Homes in Camden are likely to cost more than renting in the private sector, but could cost considerably less than full market value.'</p>
MM30	85/86	3.162	<p>Amend text as follows:</p> <p>'The government is considering measures that would Housing and Planning Act 2016 requires councils to promote Starter Homes. The government has consulted on proposed Starter Homes Regulations that would require certain types of development and allow developers to include a set percentage of Starter Homes in development as an alternative to more traditional forms of affordable housing. Policy H6 provides for the Council to comply with government Starter Home requirements once they come into effect. A supply of Starter Homes in the borough may have some potential to retain middle income households</p>

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			<p>that would otherwise have to move elsewhere to satisfy aspirations for owner-occupation, although the Council will need to weigh the aspirations of these households against other housing needs. Where Starter Homes are substituted for affordable housing in development proposals, the Council will expect them to replace affordable home ownership products (primarily shared ownership).</p>
MM31	90	3.179 and 3.180	<p>Delete section title and paragraphs 3.179 and 3.180:</p> <p>Camden's traveller community</p> <p>3.179 As indicated in Policy H11 (Accommodation for Travellers) and supporting paragraphs, the Council has identified a need for up to 16 additional pitches for Camden's established traveller community over the Plan period. The Council intends to identify sites on its own land with potential to meet some of this need. National planning policy for traveller sites indicates that councils should promote more private traveller site provision. The Council considers that provision for the traveller community in conjunction with large developments involving other types of housing offers the best prospect for bringing forward suitable land and securing an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development under Policy H1 (Maximising Housing Supply). Consequently, Policy H6 (Housing Choice and Mix) seeks the inclusion of traveller accommodation (private or affordable) as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale.</p> <p>3.180 Travellers commonly live on pitches providing for a static caravans supported by an amenity block, but Policy H11 Accommodation for Travellers and supporting paragraphs indicate that it may be possible to meet the needs of some traveller households with alternative forms of accommodation that support their lifestyle. It may be possible to offer serviced land to meet the needs of traveller households, possibly in conjunction with serviced plots for self-build and custom build. The extent of any resources available to the traveller community is not known, so the Council may allow developers to test the strength of interest in serviced plots for private traveller accommodation before a decision is made on whether provision should be made on any particular large site.</p>
MM32	110	3.242	<p>Amend text as follows:</p> <p>'We consider that there are already identified sites with potential to meet <u>provide more than 2,200 places in student housing from 2016/17 to 2030/31, which is over 90% of the student housing target. The Council's housing trajectory (included in the Local Plan as Appendix 4) London SHLAA</u></p>

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			<p>indicates that student housing forms the predominant supply of additional non-self-contained housing in London, and that Camden has a pipeline of sites with planning permission for <u>expected to deliver over 900-1,000</u> additional student housing places <u>from 2016/17 to 2020/21</u> (SHLAA Appendix 4). The pipeline represents sufficient deliverable sites to meet the target for student housing for the first five years of the Local Plan period. Camden's Site Allocations Document 2013, the Fitzrovia Area Action Plan and the Euston Area Plan also designate further sites where student housing could be developed, in most cases as part of a mixed-use scheme. <u>Together we consider The housing trajectory indicates that these represent sufficient developable sites to meet the provide 1,300 places in student housing target for over the subsequent ten years of the Plan period. A full review of the Site Allocations document is expected to commence when the current Local Plan proceeds to adoption, and will identify any further sites needed to meet the student housing target in full over the entire Plan period.'</u></p>
MM33	123	Policy H11	<p>Amend the third paragraph as follows:</p> <p>'We will identify deliverable sites to meet or exceed Camden's projected need for two to seven additional pitches for the established traveller community by 2020/21 and seek to identify developable sites or broad locations to meet Camden's projected need for a further seven to nine additional pitches by 2030/31.'</p>
MM34	124	Policy H11	<p>Delete the fourth paragraph:</p> <p>'In accordance with Policies H4 and H6, where housing is proposed as part of a development of 0.5 ha or greater, we will expect the development to provide accommodation for Camden's established traveller community, and may seek affordable accommodation for this community as part or all of the affordable housing contribution.'</p>
MM35	124	3.286 and 3.287	<p>Amend text as follows:</p> <p>3.286 'The Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2014 (the Accommodation Assessment) indicated that up to 16 additional pitches could <u>will</u> be required for Camden's established traveller community by 2031. This is made <u>up of</u> 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....'</p> <p>3.287 '.....In the interim, the Plan presents <u>adopts</u> the <u>full</u> need for additional pitches <u>from the Accommodation Assessment, namely seven</u> as a range. Based on the history of overcrowding at one of the existing sites, we have assessed the minimum need as two additional pitches by 2021 (with a maximum of seven), and a further seven <u>nine</u> additional pitches from 2021-31 (with a maximum of nine),</p>

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			to give a total of nine <u>sixteen</u> additional pitches minimum over the whole period (with a maximum of 16). '
MM36	125/ 126	3.291	Amend text as follows: '.... Through this process, we aim to identify sufficient land to accommodate from two to seven traveller households. The land is likely to take the form of a number of small sites rather than a single large site.'
MM37	126/ 127	3.295 - 3.297	Delete paragraphs 3.295, 3.296 and 3.297: 3.295 Seeking accommodation for travellers in conjunction with large developments involving other types of housing offers the best prospect for bringing forward suitable land and securing an appropriate relationship between relatively low density accommodation for travellers and the higher densities we would generally expect for more conventional housing development (under Policy H1 Maximising housing supply). National planning policy for traveller sites indicates that councils should promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. Consequently, Policy H6 Housing choice and mix seeks the inclusion of traveller accommodation as part of any developments involving housing that have a site area of 0.5 ha or greater, while Policy H4 provides for us to seek an affordable element of traveller accommodation from sites of this scale. 3.296 In some cases we may seek affordable traveller accommodation and forego private accommodation, depending on the resources available to the community. Any accommodation for travellers is likely to be a relatively low density and low value use, and the inclusion of affordable accommodation would be expected to have a substantial impact on viability. We therefore recognise through Policy H4 that affordable accommodation for travellers would be provided in place of some or all the affordable housing we would otherwise seek to meet general needs. 3.297 Policy H6 (Housing choice and mix) also expects large development sites involving housing to provide serviced plots for people wishing to build their own homes. If engagement with the traveller community shows that lightweight forms of construction could provide living accommodation suitable to meet travellers' needs it may be possible for provision to be made in conjunction with serviced plots for self-build and custom build.
MM38	138	Policy C2	Amend criterion a as follows: '.....The Council will: a) require development that increases the demand for community facilities and services to make appropriate contributions towards enhancing existing provision. seek <u>planning obligations to secure new and improved community</u>

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			<p><u>facilities and services to mitigate the impact of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy where this is identified on the Council's CIL Funding List;</u></p>
MM39	139	Policy C2	<p>Amend criterion g.i. as follows:</p> <p>g.i. <u>a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;</u></p>
MM40	139/ 140	4.26	<p>Amend paragraph 4.26 and insert new paragraph 4.26A as follows:</p> <p><u>4.26 The Council will seek section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met. The Council began collecting the Community Infrastructure Levy (CIL) on 1 April 2015 and over the plan period, this will provide funding towards community infrastructure alongside site-specific planning obligations to mitigate the impact of individual schemes projects identified on the Council's CIL Funding List (sometimes referred to as the 'Regulation 123 List') shows which projects and infrastructure the Council intends will be funded from CIL. The Funding List sets out the infrastructure projects and types of infrastructure to which CIL funding will be applied and which, by default, section 106 planning obligations will not be sought. The Funding list will be updated in light of changing priorities and the availability of funding. It is expected that the ward-level element of CIL may be used to enhance local community facilities. When we use Section 106 agreements, we will take into account viability as a factor in determining the types of facilities or services which are required and the timeframe in which these can be delivered. The Council will also use strategies relating to the accommodation requirements of the public and voluntary sectors when establishing need and local priorities for community infrastructure identified through consultation on neighbourhood and ward CIL spending. The Council has developed a ward member-led spending system for the local element of CIL. It is expected that a significant proportion of this income will provide funding for community infrastructure.</u></p> <p><u>4.26A When we use Section 106 agreements, we will take into account viability as a factor in determining the types of facilities or services that are required and the timeframe in which these can be delivered. In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure. The Council will also not seek contributions for community infrastructure and services from small scale and self-build developments in line with the circumstances set out in the National Planning</u></p>

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			<u>Practice Guidance. The Council will use strategies relating to the accommodation requirements of the public and voluntary sectors when establishing need and local priorities for community infrastructure identified through consultation on neighbourhood and ward CIL spending.</u>
MM41	144	4.44	Amend text as follows: 'Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. <u>Community facilities generally have a relatively low capital value compared with housing sites. We will seek the maximum reasonable amount of affordable housing in accordance with Policy H4, having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use.</u> '
MM42	147	Policy C3	Amend the first paragraph and the delete the second as follows: 'The Council will <u>seek to protect cultural and leisure facilities and manage the impact of adjoining uses where this is likely to impact on their continuing operation</u> valued by the community, including protected groups and which are an important identity of the Borough or local area, cultural variety and richness, health and wellbeing, townscape, heritage and the economy. We will also protect cultural and leisure uses, particularly Camden's live music venues and theatres, from other conflicting uses which are likely to adversely impact their continued operation.'
MM43	147	Policy C3	Amend fourth paragraph as follows: 'Exceptionally it may be practicable for a cultural or leisure facility to be re-provided elsewhere <u>on-site through redevelopment, or elsewhere in the Borough</u> . The Council will take the following into account.....'
MM44	148	4.55	Amend section title and text as follows: Retaining valued cultural and leisure facilities 'The Council will seek to retain cultural and leisure facilities taking into account their value to the community including protected groups . In assessing planning applications, we will consider the effects of the proposal on both the local area and the wider borough and whether the loss of a use would be detrimental to the range of leisure and cultural facilities, including specific cultural and leisure activities (e.g. live music), where appropriate. <u>We will also consider whether the scheme would be detrimental to health and well-being through the loss of facilities which provide meeting spaces</u>

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			<u>for the community.</u> We will take into account any planned new facilities which may address a shortfall in provision.'
MM45	149	4.61	Amend text as follows: 'When a proposal would result in the loss of existing cultural <u>or leisure</u> uses, we will take into account the size, layout and design of the existing facility, the mix of uses in the area and proposals for the re-instatement of a cultural or leisure facility <u>on-site</u> or elsewhere. It is considered that scope.....'
MM46	152	Policy C4	Amend text as follows: 'The Council will <u>seek to</u> protect public houses which are of community, heritage or townscape value. The Council will not grant planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless it is demonstrated to the Council's satisfaction that: a. the proposal would not result in the loss of pubs which are valued by the community (including protected groups), or which make a valuable contribution to the historic environment or character of the local area <u>unless there are equivalent premises available capable of meeting the community's needs served by the public house; or</u> b. equivalent premises capable of meeting the community needs served by the public house are available <u>there is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term.</u> c. there is no interest in the continued use of the property or site as a public house; d. there is no reasonable prospect of a public house being able to trade from the premises in the next 5 years.'
MM47	154	4.79	Amend text as follows: 'There are many instances in London of a struggling pub being turned around by new operating models and management. This includes pubs being run as a community social enterprises. The Council will require applicants to demonstrate to the Council's satisfaction there is no reasonable prospect of the pub being able to trade from the existing premises in the medium term (ie the next five years) . We will require details.....'

Ref	Page	Policy/ Paragraph	Main Modification
MM48	166	Policy E1	Amend criterion g iii as follows: iii. safeguarding the <u>Kentish Town</u> borough's main Industry Area;
MM49	171/ 172	5.32	Amend text as follows: '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 and to safeguard the identified <u>Kentish Town</u> Industry Area. <u>This is a large area with a mix of industrial uses and no housing, making it particularly suited for continued industrial employment use (see also paragraph 5.44).</u> We will support proposals for.....'
MM50	173	Policy E2	Amend criterion e as follows: e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy <u>and will be to a sustainable location;</u>
MM51	174	Policy E2	Amend last paragraph as follows: 'Where proposals in Hatton Garden would increase total gross internal floorspace by more than 200 sq m, we will seek to negotiate up to 50% of the additional floorspace as affordable premises suitable for the jewellery sector.'
MM52	175	5.41	Amend text as follows: '..... The loss of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated that it is possible for the existing business to be relocated to a sustainable location and that this would not cause harm to CAZ functions or Camden's local economy. <u>(Further guidance on business uses considered to support the CAZ is set out in the Mayor of London's Central Activities Zone Supplementary Planning Guidance.)</u> <u>Redevelopment should retain as far as possible existing businesses that desire to remain on the site, and in particular retain industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy.</u> The re-provided employment floorspace on the proposal site should be designed flexibly.....'
MM53	176	After para 5.43	Insert new paragraph 5.43B as follows: <u>5.43B Where provision of SME workspace has been agreed as part of a development, the Council will seek to secure this via the use of planning obligations. We will also seek to secure through a planning obligation an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000 sq m or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>factors such as location, type, quality etc. Where workspace has been specified as affordable, the Council's Economic Development Team will work with developers to agree appropriate terms of affordability on a case by case basis. The following are examples of ways in which affordability could be considered:</u></p> <ul style="list-style-type: none"> • <u>an element of the space could be provided at less than 80% of comparable market values. (However, for many sectors and locations in Camden rents will need to be lower than this to make them affordable to target occupiers.);</u> • <u>a sponsorship programme through which a number of local businesses are able to access space at reduced rents for an agreed period;</u> • <u>an average of market rents paid by tenants in the area occupying an equivalent type and quality of space.</u> <p><u>The Council will also consider alternative suggestions made by developers.</u></p>
MM54	176	5.44	<p>Amend text as follows:</p> <p>'The Council will retain the <u>Kentish Town</u> Industry Area for industrial and warehousing uses as set out in Policy E1, 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. Part of the Industry Area is in low density employment use. The Council will consider higher intensity redevelopment proposals for employment uses for the use classes identified within this paragraph. <u>Redevelopment proposals for the Industry Area will be assessed in accordance with Policy E2. The inclusion of other priority uses, as set out in criterion h, will not be required as part of any redevelopment scheme; however the inclusion of such uses could form part of</u> Any <u>development proposals that would provided that they introduce uses that would not prejudice the successful operation of businesses in the area.</u> will be resisted.'</p>
MM55	177	5.50	<p>Amend text as follows:</p> <p>'Where redevelopment proposals would increase total gross floorspace by more than 200 sq m, we will seek to negotiate up to <u>up to 50% of additional floorspace as affordable premises suitable for the jewellery sector. In such cases the Council will expect rents for the designated jewellery space to be no more than the average of market rents for B1c space in jewellery use in Hatton Garden and will seek to negotiate lower rents where possible. When the provision of workspace is not possible.....'</u></p>
MM56	178	Policy E3	<p>Amend criterion d as follows:</p> <p>d. expect <u>encourage</u> large-scale tourism development and visitor accommodation to provide training and employ Camden residents;</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM57	179	5.56	Amend text as follows: 'The Council will guide tourism development that is likely to attract large numbers of people to Camden's part of Central London, particularly the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road. <u>The Council will generally consider large-scale developments to be those that provide additional floorspace of 1,000 sqm or more.</u> For tourism developments in Fitzrovia.....'
MM58	189	Policy A2	Amend criteria a and b as follows: a. protect all designated public and private open spaces as shown on the Policies Map and in the accompanying schedule <u>unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area.</u> b. safeguard <u>open space land greater than 400sqm</u> on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals on this land we will apply the following criteria take the following into account: i. the effect of changes in the proposed scheme on the size, siting and form of existing open space on the amenity value of the land <u>and the functions it performs;</u> ii. open space improvements which would benefit existing estate residents whether the open space is replaced by <u>equivalent or better provision in terms of quantity and quality;</u> iii. wider community benefits from the re-configuration of land, including the provision of affordable housing <u>whether the public value of retaining the open space is outweighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of open space.'</u>
MM59	189	Policy A2	Amend criterion f as follows: f. conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas <u>or to the setting of heritage assets.</u>
MM60	189	Policy A2	Insert new criterion after criterion h and renumber subsequent criteria: <u>'x. consider development for alternative sports and recreation provision, where the needs outweigh the loss and where this is supported by an up-to-date needs assessment;'</u>
MM61	190	Policy A2	Amend criterion m as follows: m. give priority to securing new public open space on-site, with provision off-site near to the development only

Ref	Page	Policy/ Paragraph	Main Modification
			considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council will <u>may</u> accept a financial contribution in lieu of provision.
MM62	190	6.32	Amend text as follows: 'It is important that we protect the public and private open spaces designated on the Local Plan Policies Map, as well as areas of land on housing estates with the potential to be used as public open space. They are a limited resource and highly valued by the community. There will be increased pressure on this space from the anticipated growth in Camden's population. <u>Camden's open space designations include outdoor sports provision, including playing fields and ancillary facilities, which the Council will seek to protect, maintain and enhance.</u> The Council's Open Space, Sport and Recreation Study (2014) provides further information relating to the attributes of individual open spaces. <u>The loss of an open space will only be acceptable where provision of equivalent or better space is made within an appropriate catchment area for the type of open space. Catchment distances are set out in Camden Planning Guidance 6.'</u>
MM63	190	6.33	Amend text as follows: 'Camden has many large housing estates with extensive areas of amenity land. This has generally not been formally designated as open space but constitutes a potential resource for providing enhanced public or communal space. The Council will continue to retain suitable land, whilst providing the flexibility for various land uses to be re-configured across the estate. <u>The Council wishes to protect this land, while allowing for the reconfiguration of open space and other land uses across estates where significant public benefits have been demonstrated (for example provision of new homes, schools and other community benefits), in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses. This can bring enhancements where land set within housing estates is of poor quality, badly arranged or offers limited value in terms of open space functions for which it can used.'</u>
MM64	191	6.37	Amend text as follows: 'Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. <u>The Council will protect such spaces in accordance with paragraph 74 of the National Planning Policy Framework.</u> Gardens help shape their local area, provide a setting for buildings, provide visual interest and may support natural habitats. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that

Ref	Page	Policy/ Paragraph	Main Modification
			occupies an excessive part of the garden, and where there is a the loss of garden space which contributes to the character of the townscape. Part of the established character of these spaces may also be defined through features such as railings and garden walls. We will seek the retention of these features where they make a positive contribution to townscape value.'
MM65	193	New para 6.41A	Insert new paragraph 6.41A after 6.41: <u>6.41A The Council recognises that the need for sports and recreation provision can change over time. The Council will consider proposals for alternative provision of such uses where a need has been demonstrated to its satisfaction and this need outweighs the loss of the existing provision. The proposal will also be assessed taking into account its impact on the integrity on the open space and against other relevant policies.</u>
MM66	193	6.45	Delete the existing paragraph and replace with text below: We will secure contributions from all schemes considered to generate a demand for public open space. This will normally be achieved through the use of planning obligations, however the Community Infrastructure Levy (CIL) may in some cases be used to pool funding for parks and open space improvement projects identified by the Council. The Council will apply the standard to take account of any CIL contributions where necessary to ensure development schemes are not required to fund improvements to the same open space through planning obligations and CIL. <u>The Council will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand a development places on existing open spaces is met. In some cases the Community Infrastructure Levy will be used to provide funding for open space improvements identified by the Council on the CIL Funding List. Where the Council negotiates a planning obligation, we will apply the standards set out in criterion I. Planning obligations will not be sought for open space projects which are included in the CIL Funding List. In addition, the Council recognises that the pooling of planning obligations is limited to a maximum of five section 106 agreements per infrastructure project or type of infrastructure. The Council will also not seek contributions for open space from small scale and self-build developments in line with the circumstances set out in the National Planning Practice Guidance.</u>
MM67	212	Policy A5	Amend criteria n to v as follows: 'The Council will require applicants to demonstrate that proposals for basements: n. maintain the structural stability of the building and neighbouring properties do not harm neighbouring properties, including requiring the provision of a

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>basement impact assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';</u></p> <p>o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;</p> <p>p. do not harm the structural stability of the host building, neighbouring buildings or the water environment in the local area;</p> <p>p q. avoid cumulative impacts;</p> <p>q r. do not harm the amenity of neighbours;</p> <p>r s. provide satisfactory landscaping, including adequate soil depth;</p> <p>s t. do not harm the appearance or setting of the property or the established character of the surrounding area;</p> <p>t u. protect important archaeological remains; and</p> <p>u v. do not prejudice the ability of the garden to support trees where they are part of the character of the area.'</p>
MM68	214	After para 6.118	<p>Insert new section title and paragraphs after paragraph 6.118:</p> <p><u>Burland Scale</u></p> <p><u>6.118A Where a BIAs identifies risk of damage to properties by subsidence this risk should be described using the Burland Scale. The Burland Scale methodology has been adopted for projects internationally and has been used by the Building Research Establishment and the Institution of Structural Engineers, London. The classification system of the scale is based on the ease or repair of visible damage. Subsidence is only one element in the many potential impacts assessed in a BIA and other methods will be employed when describing these other impacts.</u></p> <p><u>6.118B In the Burland Scale the damage to properties caused by subsidence may be considered in three broad categories:</u></p> <ul style="list-style-type: none"> <u>• (i) visual appearance or aesthetics,</u> <u>• (ii) serviceability and function, and</u> <u>• (iii) stability.</u> <p><u>Burland Scale categories 0, 1, and 2 refer to (i) aesthetic damage, category 3 and 4 relate to (ii) serviceability and function, and 5 represents damage which relates to stability. Burland states that it is a major objective of design and construction to maintain a level of risk to buildings no higher than category 2, where there is only risk of aesthetic damage to buildings (see Burland, J. "The assessment of the risk of damage to buildings due to tunnelling and excavations", Imperial College London, 1995). However the Council considers that neighbouring residential properties are particularly sensitive to damage, where relatively minor internal damage to a person's home can incur cost and considerable inconvenience to repair and redecorate. Applicants must therefore demonstrate in the basement impact assessment that the basement scheme has a risk of damage to neighbouring properties no higher than Burland</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>Scale 1 'very slight'.</u>
MM69	234/ 235	Policy D2	<p>Amend the policy text as follows:</p> <p>[...]</p> <p>Designated heritage assets</p> <p><u>'Designated heritage assets include Conservation Areas and listed buildings.</u> The Council will not permit the loss of or substantial harm to a designated heritage asset 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 of the following apply:.....'</p> <p>Conservation areas</p> <p><u>'Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'Designated Heritage Assets'.</u> In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will.....'</p> <p>Listed Buildings</p> <p><u>'Listed Buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'Designated Heritage Assets'.</u> To preserve or enhance the borough's listed buildings, the Council will.....'</p> <p>Archaeology</p> <p>'The Council will protect remains of archaeological importance by ensuring acceptable measures are taken <u>proportionate to the significance of the heritage asset</u> to preserve them and their setting, including physical preservation, where appropriate.'</p> <p>[...]</p>
MM70	232	7.41	<p>Amend text as follows:</p> <p>'..... The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets <u>in a matter appropriate to their significance</u>. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.'</p>
MM71	235	7.42	<p>Amend text as follows:</p> <p>'The Council has a proactive approach to conserving heritage assets. In addition to the application of Local Plan policies the Council protects the historic environment through the</p>

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			<p>following areas of work:</p> <ul style="list-style-type: none"> • Conservation Area Management Strategies: The Council works with the Conservation Area Advisory Committees to update <u>and support the implementation</u> of strategies. • Heritage at Risk: The Council identifies buildings and structure at risk and proactively <u>seeks to conserve</u> seeks their preservation <u>and where required bring back into viable use</u>, including identifying sources of funding. • Local list of undesignated heritage assets: The Council introduced the local list in 2015 and it will be updated annually. • Guidance: The Council has adopted detailed guidance for the preservation of heritage assets in the supplementary planning document Camden Planning Guidance 1: Design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required. • Area based work: <u>Conservation-Preservation and enhancement</u> of the historic environment is a key objective of area action plans and the Site Allocations. The Fitzrovia Area Action Plan for example sets principles for developing key sites which retain and enhance the setting of listed buildings.'
MM72	259	Policy CC2	<p>Amend criterion g as follows:</p> <p>g) expecting <u>encouraging</u> developments (conversions and extensions) of 500 sqm of residential floorspace or above or five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment; and</p>
MM73	261	8.47	<p>Amend text as follows:</p> <p>'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 is <u>a tool that enables the Council</u> us to assess the environmental sustainability of a development.'</p>
MM74	261	8.49	<p>Amend text as follows:</p> <p>The Council has been successfully applying a minimum of Very Good BREEAM domestic refurbishment. The <u>sustainability of residential development arising from conversions, extensions and changes of use can be assessed through the use of BREEAM domestic refurbishment. We will</u> expect <u>encourage</u> developments of five or more dwellings or 500 sqm of residential floorspace or above <u>resulting from</u> (including conversions, extensions and changes of use) to achieve an excellent rating in BREEAM domestic refurbishment.'</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM75	261/ 262	8.50	Amend the text as follows: <u>'The Council will expect the application of a BREEAM assessment to Non-residential developments (including conversions, extensions and changes of use) of 500 sqm or more. We will expect these to shall achieve a BREEAM rating of Excellent from 2016 and will encourage zero carbon from 2019.'</u>
MM76	263/ 268	Policy CC3 and para 8.71	Amend criterion f as follows: 'not locate vulnerable development (such as basement dwellings) in flood-prone areas.' Amend paragraph 8.71 as follows: 'Basements can 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. <u>The Council will not permit basement schemes which include habitable rooms and other sensitive uses for self-contained basement flats and other underground structures in areas prone to flooding (Policy A5 Basements).</u> The Council shall require all new basement developments.....'
MM77	268	8.69	Amend text as follows: '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. <u>The Environment Agency published in 2016 updated climate change allowances including those for peak rainfall, which should be factored into any flood risk assessments.'</u>
MM78	270	8.79	Amend the fifth bullet point as follows: <ul style="list-style-type: none"> • developments that include biomass boilers or CHP (combined heat and power) <u>and connections to existing decentralised energy networks (whereby the increased capacity is not already covered by an existing AQA);</u> and
MM79	277	9.5	Add new section before heading 'Growth areas': <u>'Specialist Shopping Areas</u> <ul style="list-style-type: none"> • <u>Covent Garden</u> • <u>Fitzrovia and south-west Bloomsbury</u> • <u>Hatton Garden</u> • <u>Museum Street</u> • <u>Denmark Street'</u>

Ref	Page	Policy/ Paragraph	Main Modification
MM80	277/ 278	Policy TC1	Amend sixth section of the policy as follows: 'Neighbourhood centres, specialist shopping areas and small shops outside of centres: <ul style="list-style-type: none"> • appropriate provision in Neighbourhood Centres and Camden's Specialist Shopping Areas: Covent Garden, Hatton Garden, Museum Street, Drummond Street and Denmark Street, and • limited provision of small shops outside centres to meet local needs.'
MM81	278	Policy TC1	Amend the first paragraph in the section on 'Sequential Approach' as follows: 'The Council will apply a sequential approach to retail and other town centre uses outside of the areas listed above to support Camden's network of centres. Retail and other town centre uses should be located in <u>designated</u> centres according to the hierarchy above . Only if suitable sites cannot be found within <u>designated</u> centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations.'
MM82	278	After para 9.9	Insert new paragraphs 9.9A and 9.9B: <u>9.9A The sequential approach applies to sites outside of designated centres. The Local Plan does not require that retail development seeks sites within the designated centres in any hierarchical order, provided the development meets the policy objectives for each centre as described in the policy. For example, there is no need for retail development to be directed to Growth Areas before Town Centres, or to Town Centres before Central London Frontages.</u> <u>9.9B For the Central London Specialist Retail Shopping Areas of Covent Garden, Fitzrovia and south-west Bloomsbury, Hatton Garden, and Museum Street, sites should be sought within the designated frontages, not the wider boundary. Proposals for new retail development within these areas that are not within the designated frontage will be considered to be in an out of centre location.</u>
MM83	281	Policy TC2	Insert additional paragraph after criterion g: <u>'The Council's expectations for the mix and balance of uses within frontages for each designated centre are set out in Appendix 3.'</u>
MM84	282	9.16	Amend text as follows: '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 <u>Appendix 3</u> and supplementary planning document Camden Planning Guidance 5: Town Centres, Retail and Employment. Camden Planning Guidance 5 <u>Appendix 3</u> sets out the mix of uses that the Council expects on primary and secondary

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			<p>frontages, including:</p> <ul style="list-style-type: none"> • the minimum proportions of shops (A1 use); and • the maximum proportions of food, drink and entertainment uses (A3, A4, A5 uses).'
MM85	287	Policy TC4	<p>Add new criterion after c and renumber subsequent criteria:</p> <p><u>'x: the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 3.'</u></p>
MM86	287/ 291	Policy TC4 and para 9.47	<p>Delete criterion e and renumber subsequent criterion accordingly:</p> <p>e. whether development results in a proliferation of payday loan stores, betting shops, or pawnbrokers</p> <p>Delete the last section in Policy TC4 as follows:</p> <p>Betting shops, payday loan shops and pawnbrokers</p> <p>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 the same use."</p> <p>Amend paragraph 9.47 as follows:</p> <p><u>'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 <u>a the proliferation of such use is damaging these uses could damage</u> the character, <u>vitality and viability</u> of town centres. <u>The Council will therefore monitor the number and impact of betting shops, payday loan stores, and pawnbrokers over the plan period and consider whether evidence shows there is a need to introduce limits on such uses in the future.'</u></u></p>
MM87	287	Policy TC4	<p>Amend criterion f as follows:</p> <p>f. the health impacts of development, including generally resisting development of hot food take aways within 400m of secondary schools;</p> <p>Amend paragraph 9.44 and the section title as follows:</p> <p><u>Health impacts Hot food takeaways</u></p> <p><u>'In line with the National Planning Policy Framework the Council believes that the planning system can play an important role in facilitating healthy communities. One issue</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>of particular importance in the borough is childhood obesity and the Council seeks to tackle childhood obesity this issue and encourage healthy eating habits, particularly among young people. The Council is undertaking a range of programmes aimed at improving the food environment in the borough. While the causes of obesity are complex there is evidence to support that energy dense fast food is one of a number of contributing factors to obesity. <u>The Council will therefore consider the health impacts of the development of new hot food take aways in the borough.</u> Resisting the proliferation of hot food takeaways close to secondary schools is one of a number of strategies to reduce child obesity and encourage healthy eating.</u></p>
MM88	300	Policy T1	<p>Amend the first paragraph in the section on 'Public Transport' as follows:</p> <p><u>'In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to the bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.'</u></p>
MM89	302	10.12	<p>Amend text as follows:</p> <p><u>'In partnership with Transport for London, which manages the bus public transport network across London, the Council will ensure that Camden's growth is matched by improvements to 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. public transport through planning obligations. It is expected that the majority of contributions towards public transport improvements will be sought towards bus network infrastructure (such as bus stops, shelters, passenger seating, waiting areas, signage, timetable information etc.) where the demand for bus services generated by the development is likely to exceed existing capacity (assessed through Transport Assessments). The Council may also seek contributions from major developments towards other forms of public transport if an existing public transport improvement scheme is available and related to the development. Details regarding public transport contributions can be found within our supplementary planning document, Camden Planning Guidance 8: Obligations. Details regarding Transport Assessments can be found within Camden Planning Guidance 7: Transport.'</u></p>

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MM90	305	10.20	<p>Amend text as follows:</p> <p>'In redevelopment schemes, the Council will consider retaining or reproviding existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed. This is common where an existing dwelling or block is being extended or subdivided. It can also occur where a change of use brings a site or property into residential occupation. If a development is to have new occupiers, this should be car-free. <u>Where redevelopment involves a town centre car park identified in Camden's Site Allocations Plan as supporting the functioning of the town centre, the Council will consider the retention of the existing parking provision or a lower level of provision on-site. Any new development on the existing car park should be car free in accordance with Policy T2.</u>'</p>
MM91	-	New Appendix 3	Add a new Appendix on town centre frontages, as detailed below
MM92	-	New Appendix 4	Add a new Appendix with the updated housing trajectory, as set out below.

Appendix 3: Town Centre Frontages

Town Centres, Central London Frontages, and Specialist Retail Areas

The Council seeks to protect the retail function of town centres by ensuring there is a minimum proportion of premises in A1 retail (shop) use. In addition in some locations the Council seeks to manage the mix and balance of uses, and the impact of food, drink, and entertainment uses by setting maximum proportion of these uses. The proportion of A1 shop and A3, A4, and A5 food, drink, and entertainment uses the Council expect for primary and secondary frontages is set out on the table below. This policy should be read in conjunction with the detailed centre specific guidance in Camden Planning Guidance 5 Town Centre and Retail.

Centre	Frontage type Displayed on the Policies Map	A1 shops Minimum proportion of A1 shops in each individual frontage	A3 A4 A5 food, drink, and entertainment uses Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	A3 A4 A5 food, drink, and entertainment uses and other non retail uses Other restrictions
Town Centres				
Camden Town	Primary (north)	Min 50%	Max 20%	No more than 2 consecutive non retail uses
	Primary (south)	Min 75%	Max 20%	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	-
	Sensitive	-	Max 30%	Max 100sqm for food, drink and entertainment uses
West Hampstead	Primary	Min 75%	Max 25%	No more than 2 consecutively in a frontage
	Secondary	Min 50%	Max 25%	No more than 2 consecutively in a frontage
Finchley Road	Primary	Min 75%	Max 20%	-
	Secondary	Min 50%	-	-
Kentish Town	Primary	Min 75%	-	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	No more than 3 consecutive non retail uses
Kilburn	Primary	Min 75%	-	No more than 2 consecutive non retail uses
	Secondary	Min 50%	-	No more than 3 consecutive non retail uses
Hampstead	Primary	Min 75%		No more than 2 consecutive non retail uses
	Secondary	Min 50%		No more than 3 consecutive non retail uses
Central London Frontages				
Tottenham Court Road	Primary	Min 80%	-	-
	Secondary	Min 66%	-	-
Holborn	Primary	Min 50%	Max 25%	-
	Secondary	-	Max 40%	-
King's Cross	Primary	-	No further food, drink and entertainment uses	-
	Secondary	-	Max 50%	-

Specialist Retail Areas				
Covent Garden	Primary	Min 80%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
	Secondary	-	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Fitzrovia and South West Bloomsbury	Primary	Min 80%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
	Secondary	-	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Hatton Garden	Primary	No loss of A1 retail	-	-
Museum Street	Primary	No loss of A1 retail	-	-
Denmark Street	Primary	No loss of A1 retail	-	-

Note: The frontage controls apply to each individual frontage, e.g. where the table above states Minimum 75% A1 retail in a primary frontage it means there must be a minimum of 75% A1 shops in each individual primary frontage in that centre, rather than a minimum of 75% of A1 retail in all primary frontages in that centre.

NEIGHBOURHOOD CENTRES

Large-scale retail development (over 1,000m²) and late night licensed entertainment will generally be inappropriate in Neighbourhood Centres due to the impact of deliveries, noise and customers on residential amenity.

Neighbourhood Centres will be considered suitable locations for food and drink uses of a small scale (generally less than 100m²) that serve a local catchment, provided they do not harm the surrounding area."

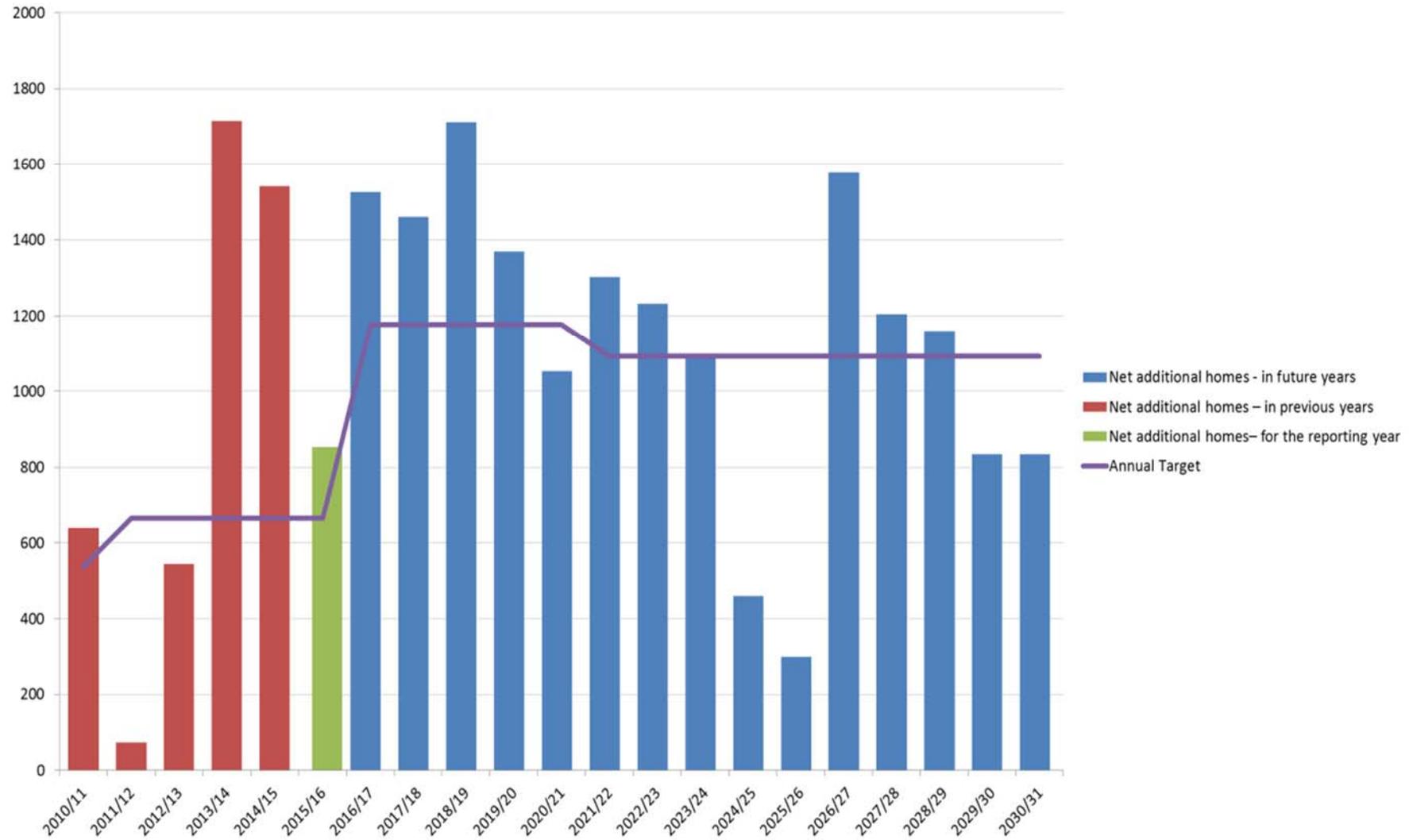
NEIGHBOURHOOD CENTRES OUTSIDE OF THE CENTRAL ACTIVITY ZONE

As a guide the Council will resist schemes that result in:

- less than 50% of ground floor premises being in retail use; or
- more than 3 consecutive premises being in non-retail use.

Centre	A1 shops Minimum proportion of A1 shops in each individual frontage	A3 A4 A5 food, drink, and entertainment uses Maximum proportion of A3, A4, and A5 uses combined in each individual frontage	A3 A4 A5 food, drink, and entertainment uses and other non retail uses Other restrictions
Brunswick Centre	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Chalton Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Cleveland Street	Min 50%	Max 25%	
Drummond Street	Min 50%		Additional food, drink, and entertainment uses acceptable subject to the assessment of impacts.
Eversholt Street (North and South)	Min 50%		Additional food, drink, and entertainment uses acceptable subject to the assessment of impacts.
Goodge Street	Min 50%	Max 25%	
Lamb's Conduit Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Leather Lane	Min 50%	Max 25%	
Marchmont Street / Leigh Street / Tavistock Place	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses
Store Street	Min 50%	Max 25%	Max 100sqm No more than 2 consecutive food, drink, or entertainment uses

Appendix 4 - Camden Housing Trajectory 2016



List of allocated sites, other sources of housing supply, the year(s) of delivery and the total annual housing supply

= cells showing expected year of delivery of allocated sites	5 year housing land supply					10 years					15 years					15 yr
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
Allocated Sites																
Middlesex Hospital Annex, Cleveland St WC1																
Arthur Stanley House, 44-50 Tottenham St, W1																
Astor College, 99 Charlotte Street (student bedrooms)																
6-17 Tottenham Court Road & others																
61-63 Tottenham Court Road & 1-7 and 11-13 Goodge Street																
Hawley Wharf, Water Lane and 39-45 Kentish Town Rd.																
Westminster Kingsway College, Regents Park Centre, Longford St.																
Bangor Wharf, Georgiana Street																
57-71 Pratt Street, 10-15 Georgiana Street and Royal College Street																
Former Nurses Hostel, 29 New End																
Phoenix Place WC1																
Royal Mail Sorting Office, 21-31 New Oxford St WC1																
St Giles Circus/Denmark Place (inc 126-40 Charing Cross Rd) WC2H																
Herbal House, 10 Back Hill, EC1R 5LQ																
12-42 Southampton Row & 1-4 Red Lion Square (former Central St Martin College)																
Land Bound by New Oxford Street, Museum Street and West Central Street																
Former BR Staff Club, College Lane																
19-37 Highgate Road, Day Centre, former Lensham House (A&A Storage) 25 and 37 Greenwood Place																
Kentish Town Police Station, 10A,12A, 14 Holmes Road																
Fire Station 20 Highgate Road																
Belsize Road Car Park (as part of Abbey Area – Phase 1 2 & 3(Car Park, Health Centre, Hinstock & Eminster)																
277a Grays Inn Road																
Land bound by Wren Street, Pakenham Street, Cubit Street, Langton Walk																
Euston Station and tracks																
EAP - Camden cutting																

	5 year housing land supply					10 years					15 years					15 yr
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
132-140 and 142 Hampstead Rd, NW1 (BHS Warehouse)																
Granby Terrace																
110-122 Hampstead Road (Former National Temperance Hospital)																
Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/ Augustus St																
Kings Cross Railway Lands																
Kings Cross Central - Triangle Site																
Elizabeth Garrett Anderson Hospital, 124-54 Euston Rd WC1																
1-39 Drummond Crescent (Euston Traffic Garage)																
4 St Pancras Way, St Pancras Hospital																
24-58 Royal College Street (Parcel Force Worldwide Depot)																
100 Avenue Road, Swiss Cottage																
187-199 West End Lane NW6 (West End Lane 1)																
156 West End Lane NW6 (West End Lane 2)																
O2 car park																
Senate House																
Total Site Allocations (self-contained)	384	319	711	378	293	592	522	300	90	85	1,068	790	775	450	450	7,207
Other Local Authority sites providing additional housing through CIP	400	400	200	250	250	200	200	200	150							2,250
Kentish Town Regis Road Growth Area (based on initial discussions)					325	325	325	325								1,300
Other self-contained dwellings with permissions at April 2015	554	554	554	554												2,216
Windfall projections (small sites that do not yet have an allocation or permission)					185	185	185	185	185	185	185	185	185	185	185	2,035
Total Site Allocations (student bedrooms)			60					80	35	30	325	230	200	200	200	1,360
Other student bedrooms with permission at April 2015	218	218	218	218												872
Hostel bedrooms with permission at April 2015	-31	-31	-31	-31												-124
Grand total	1,525	1,460	1,712	1,369	1,053	1,302	1,232	1,090	460	300	1,578	1,205	1,160	835	835	17,116
Annual Local Plan Target (with 5% buffer for 2016/17 – 2020/21)	1176	1176	1176	1176	1176	1092	1092	1092	1092	1092	1092	1092	1092	1092	1092	16,800