

Draft New London Plan Dec 2017

London Borough of Camden response

General comments

The policy approaches set out in the Draft London Plan are generally consistent with Camden's planning policies and strategic objectives, an endorsement of the Council's progressive policy approach. In particular the Council supports:

- the six 'good growth' principles, which are consistent with relevant policies and objectives in the Camden Plan and Camden Local Plan;
- the strategic target for 50% of all new homes to be genuinely affordable;
- the housing target for Camden, which is consistent with the target in the Camden Local Plan;
- the focus on equality of opportunity and health and wellbeing;
- provisions to improve London's air quality and the application of the zero carbon target to non-residential major developments;
- promotion of inclusive access to training, skills and employment opportunities and provision of affordable workspace;
- protection of pubs and cultural venues, and promotion of the agent of change principle;
- support for the night time economy and its growth and diversification;
- promotion of sustainable transport and the healthy streets approach.

Camden Council notes that the Draft Plan provides more detailed policies than the current and previous London Plans and that the Mayor intends that they are implemented as soon as possible in planning decisions. However, a single London-wide policy will not reflect the differing character and contexts of the boroughs and it remains appropriate for boroughs to prepare their own policies for matters covered in the London Plan to reflect local circumstances. As currently drafted, some policies include statements setting out requirements for borough local plans, while others do not. This fails to provide appropriate clarity on the relationship between the London Plan and borough plans.

The London Plan should therefore make it clear that boroughs can bring forward policies in their local plans to achieve the strategy of the London Plan in a way that takes into account local circumstances. This is consistent with the requirement for borough plans to be in "*general* conformity" with the London Plan, rather than accord with every aspect of it, and the statutory role of the London Plan to deal only with strategic matters. It is important that the wording of the London Plan does not prevent boroughs like Camden bringing forward progressive policy responses to local circumstances in future.

The London Plan should also include a clear statement that policies in the new London Plan do not necessarily supersede or render out of date detailed borough policies to reflect local circumstances where these are based on local circumstances and up to date evidence and are consistent with the objectives of the London Plan.

For a number of matters the Draft London Plan expects boroughs to undertake additional, sometimes substantial, pieces of work (e.g. preparing area-wide design codes, identifying locations for tall buildings, green infrastructure strategies, town centre strategies). These would have significant resource implications for boroughs at a time when resources are limited. The Plan should therefore be worded so that it is clear that any additional work is not a requirement but rather advisory and subject to resources. Boroughs should not be under risk of having their Local Plans found to be not in general conformity with the London Plan because they have not carried out a particular piece of work prescribed in the London

Plan, even through their local approach is consistent with the strategic aims for London. The GLA should resource additional borough research it seeks to prioritise.

Camden Council's detailed comments on the Draft London Plan are set out below.

Chapter 1 Planning London's Future (Good Growth Policies)

Paragraph 0.0.21

This states that "As the London Plan is part of every borough's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. However, in some instances a local approach is required within the context of the overall policy. The Plan clearly sets out where this is the case."

A London-wide policy will not reflect the differing character and contexts of the boroughs and therefore it remains appropriate for boroughs to prepare their own policies for matters covered in the London Plan to reflect local circumstances. We therefore request that the London Plan makes it clear that boroughs can bring forward policies in their local plans to achieve the aims of the London Plan in a way that takes into account local circumstances and evidence, where they consider it appropriate to do so.

This is consistent with the requirement for borough plans to be in "*general conformity*" with the London Plan, rather than accord with every aspect of it. The Town and Country Planning Act 1990 (as amended) indicates that a London borough's local plan shall be in "*general conformity*" with the spatial development strategy. The Greater London Authority Act 1999 (s334) indicates that the "*The spatial development strategy must deal only with matters which are of strategic importance to Greater London*".

As worded, paragraph 0.0.21 suggests that it is the role of the London Plan to set out where boroughs should provide local policies and implies that unless explicitly stated in the London Plan boroughs should not bring forward local policies on a particular matter. However, it necessarily will be boroughs, rather than the GLA, who know when their local circumstances justify a specific policy response in their local plan. Paragraph 0.0.21 should be amended to reflect this. It is important that the wording of the London Plan does not prevent boroughs like Camden bringing forward progressive policy responses to local circumstances in future.

The Plan should also explicitly recognise that it is reasonable and appropriate for boroughs to take a locally specific policy approach that diverges from the London Plan approach where this is merited by exceptional circumstance, supported by robust evidence; in the same way that it local plan policies can diverge from national policy where warranted. This is consistent with the legal fact that the application of policy must allow for the possibility of justified exceptions. (E.g. as recognised in the Court of Appeal's judgement on the case of the Secretary of State v. West Berkshire District Council and Reading Borough Council C1/2015/2559: [2016] EWCA Civ 441.)

The London Plan should also include a clear statement that policies in the new London Plan do not necessarily supersede or render out of date detailed borough policies where these are based on local circumstances and up to date evidence and are consistent with the objectives of the London Plan. Without such statement, the adoption of the London Plan will leading to a reduction in the ability of boroughs to implement more detailed or locally specific policies that contribute towards delivering the policy objectives of the Mayor.

Paragraph 1.01 and 1.0.2

Welcome the recognition of the important role of planning in shaping growth and development to improve places and lives.

Good Growth Policies - General

Camden welcomes the six 'Good Growth' principles identified in the Draft London Plan which are consistent with the policies and objectives in the Camden Local Plan and the Camden Plan, the Council's corporate strategy.

Policy GG1 Building strong and inclusive communities

The strategic principles set out in Policy GG1 are supported. In particular, we welcome reference in policy GG1 to addressing social isolation.

Policy GG2 Making the best use of land

The strategic principles set out in Policy GG2 are supported.

Criterion F - We welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

Paragraphs 1.3.1 to 1.3.5

We welcome the Mayor's highlighting of the wider determinants of health that are influenced by spatial planning. This section should explicitly refer to the Mayor's Health Inequalities Strategy and the Mayor's Transport Strategy to point potential developers towards the evidence base underpinning the Plan's approach to health inequalities and active/sustainable travel.

Policy GG3 Creating a healthy city

The strategic principles set out in Policy GG3 are welcomed. We support consideration of the wider determinants of health, promoting active lifestyles, healthy streets, assessment of the health and wellbeing impacts of development, and reducing health inequalities. Camden's recent review of the Local Plan specifically considered how the full range of planning policies could bring about positive benefits for health and wellbeing (a 'health in all policies' approach). It would be beneficial if the supporting text to policy GG3 included a cross reference to policy GG1, in particular recognition of the role that measures to increase social integration and address social isolation can play in improving health and wellbeing.

Policy GG4 Delivering the homes Londoners need

The Council supports the ambitions of Policy GG4 and the strategic target for 50 per cent of all new homes to be genuinely affordable.

In particular, the Council supports the statement in paragraph 1.4.4 that: "*Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan documents and are not required to take account of nationally-derived local-level need figures.*"

The Council agrees that the London Plan should aim to meet the level of housing need identified by the London Strategic Housing Market Assessment (SHMA), and that the borough level targets derived from the London Strategic Housing Land Availability Assessment (SHLAA) should be a key building block for housing targets in borough local plans. The Council considers that this strategy is appropriate to avoid the wasteful duplication that arises where each borough must identify housing need at a more local level, and negotiate with all nearby boroughs to agree how that need should be met.

Policy GG5 Growing a good economy

The strategic principles set out in Policy GG5 are supported.

To support the approach more guidance may be needed for those involved in planning and development in order to ensure that the benefits of economic success are shared more equitably.

Policy GG6 Increasing efficiency and resilience

The strategic principles set out in Policy GG6 are supported.

An integrated approach to infrastructure delivery is welcomed but sufficient funding is needed from both the private and public sectors.

Chapter 2 Spatial Development Patterns

General Comments

The contribution of Crossrail and Crossrail 2 to housing and economic growth in London is recognised but the funding mechanisms for these projects should be designed so that they do not draw funds away from other necessary infrastructure at the local level.

Policy SD1 Opportunity Areas

We support the continued designation of Opportunity Areas in Camden at King's Cross, Euston and Tottenham Court Road.

However, we question the amendments to the numbers of 'new homes' and 'new jobs' provided in Figure 2.11 compared with those included in Annex 1 of the current London Plan. The numbers are compared below.

Opportunity area	New homes	New homes	New jobs	New jobs
	London Plan March 2016	New London Plan 2017	London Plan March 2016	New London Plan 2017
Euston	2,800-3,800	2,800-3,800	7,700-14,100	16,500
King's Cross	1,900	1,000	25,000	48,000
Tottenham Court Road	500	300	5,000	6,000

We would welcome clarification of whether the amended numbers are intended to reflect progress in delivery of homes and jobs since the publication of the previous London Plan 2011. If that is the case, it is not clear why the anticipated number of jobs has increased significantly in each case.

The Council is particularly concerned that for King's Cross the indicative employment capacity has been increased from 25,000 to 48,000 in Figure 2.11, while the number of homes has dropped from 1,900 to 1,000.

The parameters of the development for the King's Cross Opportunity Area are established by the outline planning consents granted in 2006 (for the main site) and 2008 (for the adjacent 'Triangle site'). Since that time, around half of the anticipated homes have been delivered, and a significant proportion of the employment space has been delivered.

The Council expects development to continue at King's Cross in line with the existing planning consents. We anticipate delivery of around 1,000 homes at King's Cross in addition to those already delivered, including a high proportion of affordable homes. We would welcome assurances from the GLA that the numbers included in Figure 2.11 are not based on amendments to the scheme to reduce the number of homes and increase the amount of employment space. Any measure that would involve a significant reduction in the delivery of homes at King's Cross could harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by the London Plan Table 4.1.

Paragraphs 2.1.66

Camden supports the references to:

- the existing Euston mainline station being 'outdated', as this wording underlines the need for a comprehensive redevelopment of the existing station;
- 'significant' potential for intensification and opportunity to 'comprehensively transform Euston'. The Council supports this more ambitious wording as it aligns with its objective to maximise new homes, jobs etc. and create a new piece of city at Euston;
- the 'knowledge quarter' in Draft London Plan rather than 'university quarter' in current London Plan. The term 'knowledge quarter' has a wider scope including universities, medical institutions, R&D, creative and tech sectors, which are all currently clustered in the Euston area; therefore this term is more appropriate.

A fully coordinated and comprehensive approach towards a single vision (rather than a piecemeal approach) needs to be taken in the redevelopment of Euston station and the surrounding area. The Council feels that the emphasis should be on enhancing Euston as a place focused around a world-class transport interchange. Reconnecting existing communities and the provision of high quality replacement and new public realm and open space are key objectives of Camden Council for the Euston area (as expressed in the Euston Area Plan). Therefore, reference should be made to these within the London Plan's vision for Euston.

The following amendments are proposed to ensure these objectives are reflected in the Plan:

Third sentence - "*There is significant potential for intensification and an opportunity to create a new piece of city, comprehensively transforming Euston station and the immediate area, reconnecting existing communities and delivering a world-class sustainable transport interchange and new residential and business district with high quality public realm and open space.*"

The promotion of sustainable modes of transport and the Healthy Streets agenda are a key priority for Camden Council, the GLA and TfL. Suggest rewording the fourth sentence of para 2.1.66 to reflect this:

"Scope exists to reconfigure-improve Euston Square Gardens and by reducing the impact of the bus station to enhance this space and improve transport facilities, recognising its historic footprint whilst prioritising sustainable transport modes for onward travel, with a focus on the creation of Healthy Streets."

Suggest there is a separate sentence to reference the knowledge quarter and relevant employment sectors, rather than it being split across two sentences, as this is more logical. Also, suggest inclusion of the term 'creative' since the aspiration of the Euston Area Plan is also for creative industries/start-ups etc. at Euston. Suggest rewording the fifth sentence as follows:

"There is scope to expand the knowledge quarter, to ~~This should~~ support the area's strengths in the Life Sciences, Creative and Tech industries."

The Euston Area Plan was produced jointly by Camden Council, working in partnership with the GLA and TfL. Suggest rewording the sixth sentence as follows: “The ‘Euston Area Plan’ produced jointly by Camden Council, GLA, and Transport for London, was adopted in 2015.”

Paragraphs 2.1.66-67 mention comprehensive development of Euston. This needs to make clear that this applies to redevelopment of the station itself in creating a world class sustainable transport interchange. This includes redeveloping the 'classic' and HS2 parts of the station and Crossrail 2 (CR2) in a fully co-ordinated and comprehensive manner towards a single vision rather than piecemeal development. It should also include wider redevelopment of the Euston area including over station development and other development in the area precipitated by redevelopment of the station.

The Plan should state that redevelopment should improve the transport facilities in a sustainable manner, i.e. prioritising sustainable transport modes for onward travel, in accordance with the Mayor's Transport Strategy. In addition to the stated intention of supporting the area's strengths, redevelopment should maximise regeneration, improve the local environment, provide quality public realm and fully integrate the station into its surrounding area, including in terms of accessibility. The reference to Crossrail 2 should to refer to its timely delivery.

The Plan needs to refer to the construction process of HS2, given that this will continue until 2033. This will have a significant impact on a wide area and will continue well beyond the period of the new London Plan. In particular, the Plan should state that the Mayor and TfL will continue to work with HS2, local authorities and other agencies such as Network Rail to reduce the impacts of the construction of HS2, for example seeking to maximise opportunities to carry material by rail and any other alternative measures to reduce the number of construction vehicles, protect the environment and safety of other users of the public highway, especially of vulnerable road users.

Paragraph 2.1.67

Camden supports the emphasis on the importance of Crossrail 2 to help improve interchange capacity at Euston.

Camden Council's aspiration is for CR2 to be delivered, and in a timely way, to complement HS2, London Underground and National Rail works. Network Rail is still in the process of sifting options for the redevelopment of the existing station. Therefore we suggest amending the first sentence of para 2.1.67 as follows:

“...options for the potential redevelopment of the existing station ~~have come forward~~ are being developed in addition to proposals for a Crossrail 2 interchange, which will require timely delivery.”

The DfT, HS2 and Network Rail are jointly procuring a Master Development Partner (MDP) for the site. Camden Council and the GLA are not formally involved and have no land interests. Therefore, suggest following amended wording to the third sentence:

“Working with HS2 and Network Rail, ~~the GLA and Camden Council,~~ the Department for Transport is seeking to pool the various land interests and secure a development partner to assist in delivering comprehensive redevelopment at Euston.”

For clarity, we suggest the following amended wording for the last sentence:

“A planning brief for the area around Euston Station is currently being produced, by Camden Council, working with the GLA and TfL.”

Suggest addition of the following sentence at the end of paragraph 2.1.67:

“The Mayor and TfL will continue to work with HS2, local authorities and other agencies such as Network Rail to reduce the impacts of the construction in the area over the coming years, including measures to maximise construction materials transported by rail.”

This additional text is suggested as applications for HS2 Large Goods Vehicles construction routes under Schedule 17 of the HS2 Act will be determined by the local planning authority and are therefore relevant to the London Plan. In addition, maximising opportunities for carriage of materials by rail may have land use consequences, thus it is appropriate to reference the strategic stance to this in the London Plan.

Policy SD2 Collaboration in the Wider South East

The Council supports the Mayor's commitment to working with partners across the wider South East, and particularly supports the Mayor in taking a role in the duty to cooperate with authorities beyond London. The Council considers that the Mayor's role of coordinating discussions with authorities across the South East is vital in avoiding the risks of delay, duplication and wasted resources that will arise if each London borough is required to negotiate with South East authorities on an individual basis regarding strategic cross-boundary issues such as housing.

The Council also strongly agrees with the Mayor's support for the use of long-term trends in migration for planning outside London (as well as within London). The Council considers that long term migration trends are appropriate to minimise the influence of short-term economic shocks such as the financial crisis of 2007-08 and the vote to leave the EU.

Policy SD4 The Central Activities Zone (CAZ)

The Council welcomes the recognition in Policy SD4 and supporting paragraphs that there are residential communities and locally orientated uses in the CAZ, but believes the Plan should recognise more fully that the communities in the CAZ and the facilities that serve them often form part of the mix of uses within specialist clusters, and are not located in discrete residential neighbourhoods.

Three of the LB Camden's wards fall entirely within the CAZ, these are Bloomsbury, Holborn and Covent Garden and King's Cross. At the 2011 Census, these wards had 35,758 usual residents (16.2% of the Borough total) and 30,897 household residents (14.5% of the Borough total), but occupied only 283 hectares, or 3.6% of the Borough's total area. These wards also contained 14.4% of the Borough's residents in employment. These residential communities therefore represent an enduring and important part of the character of Central London and a significant part of its workforce.

Many residents live in existing communities in Fitzrovia and Bloomsbury, co-located with UCL, the University of London and University College Hospital. More residents form part of a community in Covent Garden, co-located with some of the arts, culture, entertainment and retail functions of the West End. In addition, new and expanding communities are emerging at the designated Opportunity Areas at the edge of the CAZ at King's Cross Central (1,900 homes are planned of which around half have been delivered) and Euston (2,800 to 3,800 homes are planned). While the Council supports the strategic functions of the CAZ, the Council believes that Policy SD4 should also seek to meet the needs of existing and new CAZ residents and respect their quality of life.

Figure 2.16 – CAZ Diagram

The Council supports the revised boundary of Euston Opportunity Area, as this now better reflects the boundary for LBC's future Euston Station Area Planning Brief.

As policy SD4 correctly states, it is for borough development plans to define the detailed boundary of the CAZ. We appreciate that the diagram has been redrawn for clarity; however, this has had the effect of giving it an inappropriate level of accuracy which means it could be used to identify designations on particular pieces of land. The version in the final version of the Plan should be more diagrammatic, with detail properly left for borough plans and Policies Maps.

We note that the Opportunity Area at King's Cross is simply titled King's Cross OA in Figure 2.11 but as 'King's Cross – St Pancreas' (sic) in Figure 2.16. For consistency with the Camden Local Plan 2017 and Figure 2.11, the Council proposes that the term "King's Cross" should be used throughout the London Plan.

Policy SD5 Offices, other strategic functions and residential development in the CAZ

The Council supports the strategic functions of the CAZ, but considers that Policy SD5 gives too much priority to office development at the expense of other strategic CAZ functions and development that supports residential communities in Central London.

The Council notes that Figure 2.16 identifies a number of specialist clusters that are wholly or partly in the LB Camden segment of the CAZ. These include an academic cluster at UCL/ University of London and a health cluster at University College Hospital. As currently constructed, Policy SD5 would give the same weight to offices as to academic uses within academic clusters, and the same weight to offices as to health uses within the health clusters. A possible consequence of this wording is that UCL/ University of London and University College Hospital would face greater competition with office developers when seeking to acquire additional sites in the academic and health clusters, and would be less able to expand in their existing locations.

We therefore propose that the opening phrase of criteria C and D should be amended to provide for local planning authorities to give priority to the particular strategic function upon which each specialist cluster is based, as follows:

- in Criteria C and D, the phrase "Offices and other strategic functions" should be replaced with "Offices and /or other CAZ strategic functions (as appropriate to the particular specialist cluster)..."

As indicated in the Council's comments on Policy SD4, three Wards in LB Camden fall wholly within the CAZ, and on the basis of the 2011 Census these provided 14.5% of the Borough's household residents and 14.4% of the Borough's resident workforce in just 3.6% of the Borough's total area. These communities do not occupy predominantly residential neighbourhoods that can be artificially separated from other areas within the West End, Covent Garden, Fitzrovia and Bloomsbury. Policy SD5's prescriptive requirement to prioritise new office development over new residential development in the West End and the clusters of specialist CAZ strategic functions would dramatically reduce the ability of these communities to sustain themselves, cutting the potential for new housing supply and fuelling further increases in rents and sales values.

As also indicated in the Council's comments on Policy SD4, the Opportunity Areas at King's Cross Central and Euston are planned to provide new residential communities (respectively 1,900 homes – around half of which have been delivered - and 2,800 to 3,800 homes). These figures were confirmed by the GLA in the London Plan as published with amendments in March 2016, and similar figures for Euston appear in the new London Plan and in the Euston Area Plan published jointly by the GLA, TfL and LB Camden in January 2015. A prescriptive requirement to prioritise new office development over new residential development in all Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant and Castle) is not consistent with the GLA's own expectations for housing delivery at King's Cross and Euston. In particular, any measure that could suppress the delivery of homes below 2,800 at Euston, or reduce the total delivery at King's Cross significantly below 1,900 homes, could also harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by the London Plan Table 4.1.

The Council has operated local plan policies to deliver residential development in tandem with new commercial development in Central London for over 10 years. For developments in the LB Camden segment of the CAZ, these policies have sought to secure half of additional floorspace as housing – giving equal weight to new residential development and new

development for CAZ strategic functions including offices. These policies have incorporated many areas of flexibility, such as taking account of specialised operational requirements, public funding and the needs of existing users. Nevertheless, these policies have delivered large numbers of homes in developments that would otherwise have been unlikely to deliver any, sustaining the mixed-use character of Central London, adding diversity to the sources of housing supply in LB Camden, and significantly adding to overall housing supply in the Borough. Notwithstanding that the Draft Plan recognises that it is appropriate for boroughs to include mixed use policies in their development plans, the prescriptive requirement in Policy SD5 to prioritise new office development over new residential development in the West End and the clusters of specialist CAZ strategic functions would prevent Camden's successful existing policies from operating in future.

Examples of development proposals that have followed Camden's policy and have delivered (or are delivering) a mix of additional space for CAZ functions and new housing include:

Scheme	CAZ elements	Residential elements	Status
St Giles Central, 1-13 St Giles High Street 2005/0259/P	Redevelopment of existing offices (33,750 sq m) for new offices (53,000 sq m) plus retail (3,350 sq m)	109 additional dwellings including 29 social rent and 24 intermediate	Completed 2010/11
Unison Headquarters Building (former Elizabeth Garrett Anderson Hospital) 126 - 144 Euston Road NW1 2007/3736/P	Redevelopment of hospital (8,700 sq m) for new offices (11,580 sq m) and retail (50 sq m)	47 additional dwellings including 14 social rented and 3 intermediate	Completed 2010/11
Regent's Place North East Quadrant, Hampstead Road NW1 2007/0823/P 2011/2345/P 2011/2500/P	Redevelopment of mixed office, University accommodation and retail (20,000 sq m) for offices (47,860 sq m) and mix of retail and community facilities (3,600 sq m)	Redevelopment of 42 market homes for 162 homes total (120 additional) including 58 social rent and 10 intermediate	Completed 2013/14
Saatchi Building – 80 Charlotte Street 2010/6873/P	Development of existing offices (27,200 sq m) for new offices (35,600 sq m) plus flexible office/ retail (4,250 sq m) offices plus 235 sq m retail	55 additional dwellings including 10 social rent and 4 intermediate (plus 1 social rent and 1 intermediate off-site)	Under construction, commenced 2015
21-31 New Oxford Street 2014/5946/P	Former PO sorting office (30,300 sq m) developed for new office space (35,300 sq m) and a mix of retail and	21 additional dwellings (all affordable) including 13 affordable rent and 8 intermediate	Under construction, commenced 2016/17

Scheme	CAZ elements	Residential elements	Status
	community facilities (4,160 sq m)		
1 Triton Square NW1 2016/6069/P	Development of existing offices (29,080 sq m), church/ community facilities and gym for extended office (45,950 sq m), gym and retail	22 additional dwellings (all affordable) including 16 affordable rent and 6 intermediate	Permitted Nov 2017

The developers involved in these schemes were institutional and commercial investors such as Unison, Legal and General, British Land and Derwent London. These examples are only a handful of those delivered through the operation of the Council's mixed-use policy in the CAZ, but they have delivered 276 additional homes (with 98 more on the way) alongside approx 60,000 sq m additional office space (with approx 31,000 sq m on the way). Involving such investors in the delivery of housing through mixed use scheme adds to the diversity of housing supply, as the GLA is seeking to do in other parts of the London Plan.

The GLA has not suggested at any time since the formal publication of the first London Plan in 2004 that Camden policies to seek residential development in the CAZ were not in conformity with the London Plan. As recently as February to April 2016, the Council consulted the GLA on the Camden Local Plan Submission Draft (now adopted). This included Policy H2, which requires 50% of all additional floorspace in the CAZ to be self-contained housing. The GLA did not raise any conformity objection to Policy H2, or raise any objection to the Council giving equal weight to new residential development and new development for CAZ strategic functions. It is not clear to the Council why the GLA has sought to word the new Policy SD5 in a way which precludes the successful approach incorporated in Camden Local Plans since 2004.

The two approaches could be brought back into alignment by making the modest changes to the London Plan, providing for CAZ functions to have greater or equal weight relative to new residential development in the Criterion C locations identified by Policy SD5, and in Criterion D providing for the development of CAZ functions predominantly residential neighbourhoods or wholly residential streets to take place in a way that does not harm residential amenity or communities. We therefore propose the following amendments:

- in Criterion C locations, these functions should be given "greater or equal weight relative to new residential development..."; and

- in Criterion D - "Offices and other CAZ strategic functions are given equal weight relative to new residential in other parts of the CAZ not covered in parts B or C above including...

3) predominantly residential neighbourhoods or wholly residential streets (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters), provided no harm is caused to residential amenity or communities."

Para 2.5.9

Strongly support statement that affordable housing should be provided on site as part of residential and mixed uses schemes in CAZ.

Policy SD6 Town centres

We support the objective of this policy to promote and enhance town centres.

Policy SD7 Town centre network

Camden Town is identified under this policy as having future potential for reclassification as a Metropolitan, rather than Major, town centre. Camden Town does not seem to meet the definition of a Metropolitan centre in the glossary of the Plan and Camden Council would wish to discuss the reasons for this potential change and its implications with GLA officers.

Policy SD9 Town centres: Local partnerships and implementation

This states that each town centre should have a Town Centre Strategy produced in partnership at the local level. However, the Plan does not say who would produce / lead on them and how they would be funded. The production of comprehensive strategies for all town centres and their implementation would have substantial and ongoing resource implications. Given the limited availability of resources, boroughs are not in a position to produce such strategies. The GLA should resource additional borough research it seeks to prioritise.

Para 2.10.3

Regeneration offers unique opportunities to make sustainable improvements to people's health and wellbeing. Therefore, it needs to be supported by prospective health impact assessments informed by community involvement.

Chapter 3 Design

Policy D2 Delivering good design

We support the objectives of policy D2, and in particular welcome Part H on Maintaining Design Quality, which provides a strengthening of the policy requirement to ensure that design quality is maintained from the granting of planning permission through to completion of a development. We anticipate that there may be resistance from developers to the use of architectural retention clauses in legal agreements, but are of the view that the careful wording of such agreements to allow some flexibility in the appointment or architects of an equivalent level of experience and standing should overcome these concerns.

Policy D3 Inclusive design

We support the objectives of this policy to secure the highest standards of accessible and inclusive design.

Policy D4 Housing quality and standards

The Council has incorporated the Nationally Described Space Standard into the Camden Local Plan 2017. The Council supports Policy D4, which is generally consistent with the Nationally Described Space Standard and the Camden Local Plan.

The policy could be strengthened by referencing adequate kitchen space to prepare meals, which would support healthy eating and reducing overweight and obesity.

Paragraph 3.4.7

Play space for young people should also consider the needs of adults who are supervising young children, e.g. places to sit, places that facilitate social interaction among adults as well as children.

Policy D5 Accessible housing

The Council supports Policy D5, which is generally consistent with the London Plan as published with amendments in March 2016, and the approach adopted by the Camden Local Plan 2017.

However, the Council has concerns about the proposed planning conditions specified in paragraph 3.5.8.

The Council notes that independent Building Control bodies will need to assess whether each dwelling complies with the requirements of the Building Regulations. If conditions do not specify that a dwelling must comply with the optional requirements of Part M4(3)(2)(a), Part M4(3)(2)(b) or Part M4(2), then the default assumption is that the dwelling should comply with the requirements of Part M4(1).

For dwellings where authorities are seeking compliance with a requirement other than Part M4(1), the Council considers that conditions must specify the requirement that will apply to each dwelling, by reference to the application drawings.

The Council does not consider that indicating the number of dwellings of each size that must comply with each optional requirement is sufficiently specific to activate the optional requirements. If the Building Control body is not informed for each dwelling that an optional requirement applies, the Council considers that the body can be expected to assess the dwelling only against the requirements of Part M4(1).

Where dwellings are to meet optional requirement M4(3)(2)(a) for "wheelchair adaptable" dwellings, the Council agrees that it may be appropriate to specify the size of the dwellings in terms of bedrooms and bedspaces. This would help to ensure that the dwellings are designed with sufficient flexibility to allow adaptation for full accessibility for a wheelchair user without loss of bedspaces or bedrooms.

Please note that the Council has also commented on Policy H2 Small sites to propose that Policy H2 should provide for the optional requirement M4(3) to apply to homes on the ground floor.

Policy D7 Public realm

Criterion K - This policy could be strengthened by stating that public realm should maximise opportunities to support social interaction (which may be different to social activities, for example where people could simply stop and chat for five minutes) and reduce social isolation, consistent with the Healthy Streets approach.

The approach would be strengthened by cross referencing policy S6 on access to public toilets.

Para 3.7.9

Camden urges the Mayor to take into account that different groups may have different, and sometimes conflicting, uses of public space (for example, young people can see public spaces as places to simply "hang out", an activity often perceived as anti-social).

Policy D8 Tall buildings

Criterion B of Policy D8 that says that boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate. We

object to this prescriptive approach and request that the Plan is amended to recognise that it would be appropriate for boroughs to take a different approach to planning for tall buildings in light of the specific local circumstances. Camden's long established approach to tall buildings is consider the entire borough as being within the 'sensitive' category defined by the English Heritage / CABE Guidance on Tall Buildings. Due to the dense nature of Camden with extensive range and coverage of heritage assets, such as conservation areas, numerous listed buildings and five strategic views and two background views crossing the borough, it is not considered practical to identify broad areas either suitable, or not suitable, for tall buildings. In the borough, a site may be suitable for a tall building while adjacent sites are not, due to impact on either views, conservations areas or listed buildings. Indeed, in some cases, suitability for a tall building differs across a single site.

This approach has been accepted by Planning Inspectors at successive local plan examinations, most recently in 2017, as an appropriate response to the Camden's unique context. The London Plan must allow for boroughs to take appropriate local responses to tall building policy where this is merited by their local circumstances.

We also have concerns about the in-principle acceptability of tall buildings implied by the wording of the Draft Plan approach given the range and magnitude of the potential detrimental visual, functional and environmental impacts of tall buildings if they are poorly designed.

In addition, the London Plan's proposed approach, with the need for boroughs to undertake urban design analysis to identify locations suitable for tall buildings across their areas, would have significant resource implications for boroughs at a time when resources are limited. The Plan should be worded so that it is clear that such work is not a requirement but rather advisory and subject to resources.

Policy D9 Basement development

The purpose of this brief policy is unclear. Boroughs where basements are an issue have already introduced, or are planning to introduce, policies to address this.

If the policy is retained the reference to "large-scale" basement development should be deleted - policies should address the potential negative impacts of all basements, regardless of their size. Small basements, if not properly designed and constructed, also have negative impacts.

Policy D11 Fire safety

Camden supports the Mayor's aims to secure the highest standards of fire safety. We would expect the ability of the planning system to influence aspects of fire safety that are covered by other statutory regimes to be considered by the Panel holding in the examination in public.

Policy D12 Agent of Change

The Council supports the application of the agent of change principle.

Chapter 4 Housing

Policy H1 Increasing supply

The Council supports Policy H1, which is consistent with the approach of the Camden Local Plan 2017, and the housing target for the Borough included in the Local Plan.

We note that in Policy H1, Criterion C (1) (c) indicates that the boroughs should enable the delivery of the housing capacity identified in Opportunity Areas. As stated above, the Council is concerned that Policy SD5 as currently drafted will prevent the anticipated level of housing

delivery at the Euston and the King's Cross Opportunity Areas, and could also harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by the London Plan Table 4.1

Policy H2 Small sites

The Council generally supports development of small sites, but has significant concerns about some aspects of Policy H2.

We agree with the statement in Criterion (B)(1) that local character evolves over time and will need to change in appropriate locations to accommodate increased residential density through small housing developments, and welcome the Mayor's commitment to set out proposed design principles for small housing developments across London as part of his review of GLA design guidance (paragraph 4.2.6).

Over the 10 years from 2005-2015, 97% of residential developments in LB Camden involved 1 - 25 homes. Furthermore, 57% of completed homes were delivered as part of developments involving 1 – 25 homes. In that context, the Council does not consider it is necessary or appropriate to relax planning requirements in the Borough to encourage the development of small sites.

We are particularly concerned that:

- the design codes included in Criterion B would be highly resource-intensive to produce, and are unlikely to be appropriate dense urban areas such as LB Camden, with a rich variety and complexity of built form and numerous concentrations of heritage assets;
- the 'presumption in favour' of the development of small sites included in Criteria D, E and F will conflict with other policies and obligations, such as those protecting open space and heritage assets and seeking affordable housing; and
- Criterion G fails to make provision for small sites to include M4(3) 'wheelchair user dwellings' at ground floor level.

The Council also considers that it would be helpful for Criterion H to make a positive statement actively encouraging boroughs to seek payment in lieu contributions to affordable housing from sites of ten or fewer units.

Design codes

Camden's built environment heritage includes 39 conservation areas, over 5,600 buildings and structures that are nationally listed for their special historical or architectural interest, 53 squares protected by the London Squares Preservation Act 1931, 14 open spaces on Historic England's Register of Parks and Gardens, 13 archaeological priority areas and a local list of over 400 non-designated heritage assets, all within an area of just 2,180 hectares. We are not aware of any examples or models of existing design codes that would provide detailed and meaningful guidance on design in the context of such a dense mosaic of assets. Furthermore, we are not convinced that there is sufficient expertise available to prepare design codes for all London boroughs and all areas within them over a short period of time.

Much of the land and building in Camden is included in the Borough's 39 conservation areas. All of Camden's conservation areas are covered by detailed Conservation Area Appraisals and Management Plans which set out the character and appearance of the area and provide guidance on appropriate forms of development. "Area-wide design codes" could

duplicate these documents. The Council does not consider that the London Plan should seek design codes for conservation areas where detailed appraisals already exist.

We acknowledge that the GLA intends to provide Supplementary Planning Guidance to show how additional housing provision can be accommodated in different locations, but anticipate that the preparation of area-wide design codes would be a highly resource intensive process (even if conservation areas are not excluded, as we suggest). To be compelled to prepare design codes as part of our local plans would:

- require the Council to divert resources away from the preparation of area-based development briefs and frameworks that are planned to proactively encourage increased housing provision through area intensification (in line with Policy D2 Part D);
- divert resources away from the programme of review and updating of Conservation Area Appraisals and Management Plans that takes account of the need to recognise that local character evolves over time including with respect to designated heritage assets;
- delay the preparation of Local Plans and the identification of additional sites through site allocations.

The GLA should resource additional borough research it seeks to prioritise.

Presumption in favour of small housing development

The intended effect of a 'presumption in favour of small housing developments' appears to be that policy requirements affecting residential development would have less weight for schemes involving 1 – 25 homes.

As indicated above, over the last 10 years 97% of residential developments in Camden involved 1 – 25 homes. Consequently, the presumption in favour of development could potentially involve a relaxation of policy requirements for almost all residential development in Camden.

It is not clear how it is envisaged that the 'presumption in favour' would operate as under planning law decisions on planning applications must take into account the development plan as a whole and all other material considerations.

We note that the Criterion E indicates that the presumption in favour would only operate where no design code is in place. However, introducing design codes for across all areas in each borough is a vast task. Even if a significant proportion of planning resources were diverted into the task, it would be many years before boroughs enjoyed full coverage.

We are concerned that the presumption could harm boroughs' ability to ensure that developments complement and enhance the area, protect heritage assets and open spaces, and secure affordable housing.

Criterion D indicates that the presumption should apply to vacant and underused sites. Vacant or underused sites are often themselves part of the special character and appearance of conservation areas, as they can create a visual break in the built form and allow trees and greenery to grow. The presumption in favour of small housing development could lead to this character being eroded by skewing the planning balance towards development of inappropriate open sites. Green spaces, back gardens and trees are often important aspects of character and development of 'underused sites' could harm these.

Criterion D also encourages the demolition of buildings in accessible locations, including conservation areas. Most of Camden is well served by mainline, underground and

overground stations, and so most conservation areas are in accessible locations. The demolition and redevelopment of existing buildings in conservation areas could cause serious harm to their character, contrary to Council's statutory duties.

Criterion E conflicts with the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 s.72(1) to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. The term 'unacceptable harm' implies that a level of harm to a conservation area is acceptable and to be expected. This departs from the statutory requirement by encouraging an 'acceptable' level of harm through extensions, demolitions, new build and development on valued spaces. Furthermore small housing developments are treated as a public benefit regardless of the tenure, price or mix of homes in the development.

Criterion E specifies some types of harm that would be unacceptable, but this list is extremely limited. We do not support the 'presumption in favour' but if the approach is to be retained, we consider that this Criterion should be broadened to include a much wider view of harm, consistent with final bullet point of NPPF paragraph 14. As a minimum, we consider that the presumption should only apply to small housing developments that include any affordable housing provision required by policy, and the Criterion should be broadened to protect against harm to open spaces and non-designated heritage assets.

Criterion F also specifies some circumstances where a presumption in favour would not apply. If the 'presumption in favour' is to be retained, we consider that this Criterion should be extended to other circumstances. In particular:

- listed buildings can be harmed by insensitive development within their curtilage, not just to the building itself, so part (1) should refer to statutory listed buildings and their curtilages.
- part (3) implies the 'presumption in favour' applies to extensions to existing houses, and should be amended to exclude such extensions, as they provide no evident public benefit, but would be permitted where they cause an 'acceptable' level of harm to a conservation area, in conflict with both the statutory requirement of the 1990 Act and paragraphs 133 and 134 of the National Planning Policy Framework.

Wheelchair user dwellings – Criterion G

As drafted, Criterion G does not provide for boroughs to seek wheelchair user dwellings at ground floor level on sites accommodating ten or fewer new build homes. The Council considers that Criterion G should be amended to indicate that optional requirements M4(2) or M4(3) may apply at ground floor level.

Policy D5 Accessible housing provides for 10% of new build homes to meet optional Building Regulation M4(3), which would imply provision of one wheelchair user dwelling in any scheme involving 6 – 10 new build homes. Criterion G of Policy H2 is not consistent with Policy D5 as it would prevent the inclusion of any wheelchair user dwellings even where the scheme contains homes at ground floor level.

Paragraph 4.2.12 notes that for some boroughs, sites of ten or fewer units are the main source of supply and play an important role in contributing to affordable housing delivery. This is also the case for accessible housing.

Over the 10 years from 2005-2015, 92% of residential developments in LB Camden involved 1 - 10 homes, and 43% of completed homes were delivered as part of developments involving 1 – 10 homes. Wholly exempting such schemes from any requirement to meet M4(3) would significantly reduce our potential to increase the stock of wheelchair user

dwelling in the future. This would also be the case for other boroughs where a large proportion of homes are delivered through small schemes.

Proposed changes to Policy H2

The Council proposes Policy H2 should be amended to:

- place less emphasis on design codes;
- amend Criterion B(2) to indicate that boroughs should 'consider preparing' design codes;
- use an alternative form of words to 'presumption in favour' in Criteria D, E and F, such as 'proactively support';
- amend the opening sentence of Criterion D to refer only to sites outside conservation areas, i.e. 'To deliver the small sites targets in Table 4.2, outside conservation areas boroughs should...'
- amend the first sentence of Criterion E to make reference to developments which are in accordance with Conservation Area Appraisals and Management Plans;
- replace the second sentence of Criterion E with a requirement to have regard to all relevant Development Plan policies, including those for provision of affordable housing, protection of open space, and protection of heritage assets (including undesignated heritage assets);
- alternatively, amend the second sentence of Criterion E to indicate that where there is no design code or Conservation Area Appraisal and Management Plan, small housing developments should be permitted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Development Plan taken as a whole, or specific policies in the Development Plan indicate development should be restricted:
- amend Criterion F(1) to make reference to statutory listed buildings and their curtilages;
- amend Criterion F(3) to make reference to proposals that do not provide net additional homes (or dwellings);
- amend Criterion G to indicate that "New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should provide step-free access and meet the M4(2) standard for 'accessible and adaptable dwellings' or the M4(3) standard for 'wheelchair user dwellings' in accordance with Policy D5 Accessible housing. New build homes on these sized sites that are not on the ground floor..."; and
- amend Criterion H to include a positive statement actively encouraging boroughs to seek payment in lieu contributions to affordable housing from sites of ten or fewer units, in line with the statement included in paragraph 4.2.12.

Paragraph 4.2.11

We welcome the encouragement included in this paragraph for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. However, the Council considers that concerns regarding amalgamation should be included or cross-referenced in Policy H10 and paragraph 4.10.1, which directly address the loss of housing. We also consider that Policy H3 Criterion A should refer to "taking into account homes lost through demolition, amalgamation or change of use".

Policy H3 Monitoring housing targets

The Council generally supports the parameters for monitoring housing targets set out in Policy H3, but is concerned that the requirements of Criterion B could cause confusion in the case of mixed use schemes.

The Council proposes that Criterion B should either be amended to refer to "all sites that deliver between 1 and 25 additional homes, including mixed use schemes should contribute towards..." (removing the reference to 0.25 hectares),

or state that "delivery on housing and mixed-use development sites of less than 0.25 hectares should contribute towards...".

The Council welcomes the encouragement included in paragraph 4.2.11 for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. We note that in the case of larger blocks, the amalgamations involving small changes to the overall number of homes may not constitute development. However, for consistency, the Council proposes that Criterion A in Policy H3 should refer to "taking into account homes lost through demolition, amalgamation or change of use".

Policy H4 Meanwhile uses

The Council supports the principle of meanwhile use of development sites for housing, but has some concerns regarding how this will operate in practice.

We question whether it will often be possible to introduce meanwhile uses without some impact on the future development programme, especially where these involve the erection of temporary buildings and the establishment of residents with some rights of occupation.

In addition, we are concerned that meanwhile housing use could generate additional responsibilities for councils to tackle homelessness and provide replacement temporary accommodation when long-term development proposals are implemented. We therefore propose that paragraph 4.4.1 should require parameters for meanwhile housing use to include arrangements for rehousing the occupiers when the site comes forward for longer term development.

The Council also notes that GLA funding is likely to be necessary to enable meanwhile housing to be delivered in the form of precision-manufactured modular homes and re-used on alternative sites in the future.

Policy H5 Delivering affordable housing

The Council supports most elements of Policy H5, including the strategic 50% target for affordable housing, the threshold approach to viability testing and the general requirement for on-site delivery. However, we have some concerns in relation to more detailed aspects of Policy H5.

We support the principle set out in Criterion A(4) that public sector land should deliver at least 50% affordable housing, but propose that additional flexibility should be added to the criterion or supporting paragraphs acknowledging that a lower proportion may be appropriate where other significant public benefits being delivered (e.g. community investments such as schools and community centres).

Camden has introduced its Community Investment Programme (or CIP) in response to severe cuts in government capital funding, and the need for significant investment in schools, community facilities and the Council's housing stock. The programme generates investment that would not otherwise be available by ensuring that the Council makes the best use of its property assets, refurbishing or regenerating some sites and selling other sites where they are underused, surplus to requirements, no longer suitable to meet contemporary needs or too expensive to maintain.

CIP involves investment in schools, community facilities, and refurbishing and replacing homes. The scale and scope of the programme means that it is necessary to include a substantial component of new homes for sale as well as new affordable homes. Across the programme, the Council is building 3,050 new homes in total, including 650 replacement council rented homes, 450 new council rented homes, and 300 new homes for Camden

Living Rent (homes for residents who cannot afford market rent, but are ineligible for social housing). We are also building 1,650 homes for sale to fund the affordable homes, schools and community facilities.

Examples of CIP schemes that are primarily delivering new or improved community facilities include:

Scheme	Existing uses	Proposed uses	Status
Netley Primary School, 30 William Rd, NW1 2012/2089/P	Primary and nursery school; educational campus (autism spectrum disorder unit, community learning centre, primary pupil referral unit; primary learning support services, ancillary house for caretaker); garage block.	Redevelopment for: part replaced/ part refurbished school and educational campus (including all existing facilities and site manager's flat); 70 market homes (now to be used for HS2 replacement homes); and 10 affordable homes (social rent).	Completed 2014/15
1-30 Camden Street and 67-72 Plender Street NW1 2013/1969/P	Community centre, sports pitch, changing rooms, single storey shops and garages	Redevelopment for: improved community centre and changing rooms; new open space; replacement shops; 31 market homes; and 14 affordable homes (10 social rent, 4 intermediate).	Completed 2017/18
1-33 Liddell Road NW6 2014/7649/P 2014/7651/P	32 one-storey light industrial units B1c	Redevelopment for: new primary school buildings (Kingsgate Primary Lower School); new public space; mixed work spaces B1a-c (larger total floor area than existing units); 102 market homes; and 4 affordable homes (social rent).	Under construction, school building completed 2017/18
Highgate Newtown Community Centre, 25 Bertram Street N19 2016/6088/P	Community centre, 1 ancillary house for caretaker (vacant), 2 leasehold flats	Redevelopment for: improved community centre (27% more floor area); and 31 market homes.	Permitted June 2017

The Council also proposes that Policies H5 and H10 (or their supporting paragraphs) should be amended to clarify the relationship between them. On the basis of Policy H5 Criterion A(4), a 50% affordable housing target would apply to estate regeneration on Council-owned land. However, Policy H10 sets less demanding targets, with Criterion B indicating that where loss of existing affordable housing is proposed this should generally involve an uplift in affordable housing provision (presumably this is referring to demolition and replacement),

and Criterion C indicating that the delivery of additional affordable housing should be maximised.

The Council considers estate regeneration schemes should be assessed on the basis of Policy H10 rather than Policy H5 Criterion A(4), and that this should be stated in association with each of the two policies. When considering individual estate regeneration schemes or larger regeneration programmes on public land, it will rarely be possible to deliver 50% of affordable housing. What can be achieved will depend on the tenure of existing homes on the site, and whether they need to be replaced or refurbished. There may be cases where a large number of affordable homes need to be replaced, and the introduction of a high percentage of market homes is needed to fund the scheme and create a mixed and inclusive community. There may also be cases where a large number of leasehold homes need to be replaced at a cost the residents can afford, and this reduces the ability of the scheme to generate additional affordable housing. We consider that the paragraphs supporting Policy H5 should acknowledge such constraints on estate regeneration schemes.

With respect to Criterion A, and particularly Criterion A(4), the Council considers that the London Plan should clarify whether the affordable housing targets relate to net additional housing, or the overall number of homes, including replacement homes. As stated above, the Council does not consider that the 50% affordable housing target in Criterion A(4) should apply to estate regeneration schemes. However, if the target is applied, the potential for estate regeneration schemes to achieve 50% affordable housing will be greater if overall housing delivery is considered, and the replacement affordable homes are included within the 50%.

We note that Criterion B indicates that an off-site contribution to affordable housing or a payment in lieu of affordable housing should only be provided in exceptional circumstances. The Camden Local Plan 2017 (and its predecessors) have adopted an alternative cascade approach, where on-site provision is the usual approach, but off-site delivery may be acceptable where affordable housing cannot practically be provided on-site (e.g. for small schemes), or off-site provision would create a better affordable housing contribution (in terms quantity and/ or quality). The Local Plan regards a payment in lieu as the lowest tier of the cascade, and this tier (rather than off-site provision) is only accepted in exceptional circumstances.

We consider that Policy H5 Criterion B should be amended to adopt a similar cascade, giving greater flexibility for off-site delivery of affordable housing but maintaining the position that a payment in lieu should only be provided as an alternative in exceptional circumstances. This would be more consistent with the drafting of paragraphs 4.5.5 and 4.5.6, and more consistent with the advocacy of land use swaps, credits and off-site contributions through Policy SD5 and paragraph 2.5.8.

Policy H6 Threshold approach to applications

The Council generally supports the threshold approach to viability testing set out in Policy H6.

We note that for viability-tested schemes with short build-out periods, there may be little or no benefit in seeking both an Early Stage and a Late Stage Viability Review. In conjunction with Policy H2 Small sites, the GLA may wish to consider exempting schemes providing 1 – 25 homes from the requirement for both an Early Stage and a Late Stage Viability Review.

Policy H7 Affordable housing tenure

The Council supports the overall breakdown of 30% London Affordable Rent, 30% intermediate housing, and 40% borough-determined tenure, as set out in Policy H7.

In Policy H7, social rent and London Affordable Rent are referred to by the collective term "low cost rented homes". We consider this term to be misleading, as the phrase "low cost" has commonly been applied to intermediate products, notably "low cost home ownership". In our view, the Criterion A (1) should simply refer to a minimum of 30 per cent London Affordable Rent and / or Social Rent homes, allocated according to need for Londoners on low incomes.

In addition, in our view the London Plan should acknowledge that shared-ownership is not a suitable affordable tenure where house prices are high (including most of Camden), and should also allow more regard to be had to the relatively high incomes needed for London Living Rent in parts of London such as Camden.

House prices in Camden mean that shared-ownership will rarely be affordable to households with incomes below the £90,000 cap, and consequently the Camden Local Plan 2017 sets out a strong preference for intermediate rent. The Mayor's SPG on Affordable Housing and Viability recognises that shared ownership will not be appropriate where capital values of homes exceed £600,000, but this recognition is absent from the new London Plan.

Furthermore, we have recently adopted an Intermediate Housing Strategy and set up the company Camden Living. These aim to provide intermediate housing for Camden residents and workers (subject to a priority matrix) with incomes of £30,000 to £40,000, which is significantly lower than the cap for London Living Rent.

The Council considers that the London Plan should make greater reference to the provisions of the Mayor's SPG on Affordable Housing and Viability in relation to shared ownership, and particularly the £600,000 as the maximum value of a home that can be accessed at a range of incomes below the £90,000 income cap. These considerations could be included in paragraph 4.7.9. The London Plan should also provide greater flexibility to deliver local intermediate rent products, without a 'rent to buy' requirement (i.e. they continue to be available for rent after 10 years), and targeted at lower income groups in accordance with local priorities.

In particular, supporting paragraph 4.7.10 indicates that boroughs can set their own eligibility/ income cap criteria, but then states that these should be released to the London-wide eligibility criteria after a 3-month period, and should not apply to resales and relets. The Council considers that the London-wide eligibility criteria should only be imposed where GLA funding is provided, and that the GLA should restore the provision in existing London Plan paragraph 3.62 – this indicates that *"If boroughs wish to set eligibility criteria... agreements should secure them... for no more than three months from the point of initial marketing (whether that be when new or at re-sale or re-let)"*.

We note that in association with Policy H7, Table 4.3 sets out the findings of the 2017 SHMA with respect to the need for homes of different sizes (in terms of numbers of bedrooms). We have a number of observations in relation to Table 4.3:

- We consider that the categories used in Table 4.3 should better dovetail with the categories used in paragraph 4.7.3. As indicated in our comments above, we consider the term "low cost rent" to be misleading, as the phrase "low cost" has commonly be applied to intermediate products. Reference to the London SHMA 2017 indicates that the "low cost rent" category in Table 4.3 essentially gives an indication of the need for London Affordable Rent, and does not include households who would be able to afford London Living Rent. We note that the "intermediate" category in Table 4.3 gives an indication of the need for intermediate housing of all types, including London Living Rent and London Shared

Ownership. Consequently, in our view, the third row of the table should be labelled as London Affordable Rent and / or Social Rent homes.

- Table 4.3 relates more closely to the requirements of Policy H12 Housing Size Mix than the requirements of Policy H7. We suggest that Table 4.3 should be moved to the paragraphs supporting Policy H12, or that thorough cross-referencing with internal links should be introduced to connect Table 4.3 with Policy H12 and supporting paragraphs.

- The pan-London indication of needs in Table 4.3 does not necessarily relate closely to local needs at the borough level, and certainly does not closely reflect the needs identified by the Camden SHMA 2016. The Council's comments on Policy H12 seek greater recognition of local circumstances and local needs for homes of different sizes.

Policy H9 Vacant building credit

The Council agrees that it is unlikely to be appropriate to apply the Vacant Building Credit to sites in London, and therefore supports Policy H9.

Policy H10 Redevelopment of existing housing and estate regeneration

The Council generally supports Policy H10, but proposes some amendments in relation to detailed aspects of the policy and supporting text.

As stated in our comments on Policy H5, the Council considers that Policies H5 and H10 (or their supporting paragraphs) should be amended to clarify the relationship between them, and should state that estate regeneration schemes will be assessed on the basis of Policy H10. When considering individual estate regeneration schemes or larger regeneration programmes on public land, it will rarely be possible to deliver the 50% of affordable housing target envisaged by Policy H5 Criterion A(4).

Criterion A - As noted in the Council's comments on Policy H2 Small sites, the Council welcomes the encouragement included in supporting paragraph 4.2.11 for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. However, Policy H10 Criterion A and paragraph 4.10.1 directly address the loss of housing, therefore the Council considers that encouragement for measures to resist amalgamation should be included or cross-referenced here.

Criterion C – this indicates that where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost. The Council considers that Criterion C and supporting paragraphs should provide flexibility for replacement social homes to be let at target social rent levels.

Rent levels on Camden Council estates are currently below target rent levels in many cases. Where estate regeneration takes place, replacement homes provided through Camden's Community Investment Programme (CIP) will be higher quality, more energy efficient, and in many cases larger. To make estate regeneration viable, it will be necessary to charge target social rents for replacement homes. These rents are 'based on' the rents of the housing that has been replaced, but they may be a little higher (although heating costs will be lower in the replacement homes).

Paragraph 4.10.2

The Council suggests that the aims of estate regeneration projects included in this paragraph should include the delivery of additional homes.

Policy H11 Ensuring the best use of stock

The Council generally supports Policy H11, but considers that the London Plan should take a more active stance to ensure homes are available to long-term residents, and that Policy H11 should indicate that the Mayor's support for boroughs in resisting use of homes as holiday rentals for more than 90 days per calendar year.

The Camden Local Plan 2017 indicates that the Council will seek to use planning obligations ensure that new homes for sale are marketed and available to buy in London for at least two months before they are marketed more widely. The Council suggests that the London Plan could helpfully provide explicit support for this measure.

Policy H12 Housing mix

The Council generally supports Policy H12, but proposes some amendments in relation to detailed aspects of the policy and supporting text.

The Council's comments on Policy H7 Affordable housing tenure include a number of observations on the accompanying Table 4.3, and these are also relevant to Policy H12.

- Table 4.3 relates more closely to the requirements of Policy H12 Housing size mix than the requirements of Policy H7. We suggest that Table 4.3 should be moved to the paragraphs supporting Policy H12, or that thorough cross-referencing with internal links should be introduced to connect Table 4.3 with Policy H12 and supporting paragraphs.

- We consider that the categories used in Table 4.3 should better dovetail with the categories used in paragraph 4.7.3. As indicated in our comments on Policy H7, we consider the term "low cost rent" to be misleading, as the phrase "low cost" has commonly be applied to intermediate products, notably "low cost home ownership". Reference to the London SHMA 2017 indicates that the "low cost rent" category in Table 4.3 essentially gives an indication of the need for London Affordable Rent, and does not include households who would be able to afford London Living Rent. We note that the "intermediate" category in Table 4.3 gives an indication of the need for intermediate housing of all types, including London Living Rent and London Shared Ownership. Consequently, in our view, the third row of the table should be labelled as London Affordable Rent and/ or Social Rent homes.

- The pan-London indication of needs in Table 4.3 do not necessarily relate closely to local needs at the borough level, and certainly do not closely reflect the needs identified by the Camden SHMA 2016. The Council therefore considers that Policy H12 should recognise more fully that the provision of homes of different sizes should be informed by local circumstances and local evidence of needs; a single Londonwide approach is not able to reflect local needs.

The Camden SHMA 2016 indicates that the housing mix needed in LB Camden is quite different from the mix needed across London. Overall, there is less need for one bedroom homes and a much greater need for two and three bedroom homes.

Housing mix needed for Camden 2016-31 (source Camden SHMA 2016 figure 96)

	1-bedroom	2-bedroom	3-bedroom	4-bedroom +	All sizes
Market housing	1,000*	2,400*	2,700*	400*	6,600
Percentage	15%	37%	42%	6%	100%
Affordable	400	3,900	3,600	2,300	10,200
Percentage	4%	38%	35%	22%	100%

*Total market requirement is 6,600, but the rounded figure for the different sizes sums to 6,500, so 6.500 has been used to calculate percentages

The needs identified by the Camden SHMA reflect an extreme skew toward small units in Camden's existing housing stock. The 2011 Census indicates that 70% of all Camden households live in homes with two bedrooms or fewer, rising to 75% for households in social rented housing. Correspondingly, the Census indicates that 11.7% of households overall are

overcrowded (bedroom occupancy ratio of -1 or lower), compared with 19.3% for households in social rented housing, and 5.7% for households in owner-occupation and shared ownership.

In this context, the Council considers it essential that Policy H12 should ensure that Camden's particular circumstances are fully taken into account in determining the mix of unit sizes required locally.

In relation to Criterion A, the Council considers that:

- regard should be had to local assessments of housing need wherever they are up-to-date, and the words "where relevant" should be deleted from part (1);
- the list of considerations in Criterion A should include the "the mix of unit sizes in the existing local housing stock";
- in Camden, conversion of the existing stock more commonly takes the form of amalgamations rather than sub-divisions, and part (8) should reflect this by making reference to "pressure on conversion, *sub-division and amalgamation* of existing stock";
- the relationship between the appropriate mix of unit sizes and the potential for custom-build and community-led schemes is not clear, either part (10) should be deleted from the list of considerations, or its relevance should be explained in the supporting paragraphs.

In relation to Criterion C, the Council's response to Policy H7 sets out the difficulties of providing intermediate homes (including shared ownership and intermediate rent) that are affordable below the income caps of £90,000 and £60,000 respectively. These difficulties are particularly pronounced for shared ownership where the capital value of homes exceeds £600,000, as recognised by the Mayor's SPG on Affordable Housing and Viability. In Camden, the capital value of homes with 3-or-more bedrooms exceeds £600,000 in almost every case, and consequently the Council does not seek intermediate homes with 3-or-more bedrooms. We consider that Policy H12 should be amended to take this consideration into account, either by deleting the words "and intermediate" from clause C, or by including specific recognition in supporting paragraphs that boroughs where the capital value of homes is very high may wish to specify studio, 1-bed and 2-bed homes as their priority unit sizes for intermediate homes.

In relation to Criterion D, the Council considers that:

- as indicated in our comments on Table 4.3, the term "low cost rent" does not dovetail with the terms used in paragraph 4.7.3, and could helpfully be replaced by the term "London Affordable Rent", which more clearly excludes intermediate products including London Living Rent; and
- the list of considerations guiding the mix of affordable housing included in Criterion D and amplified in paragraph 4.12.6 should include any existing skew in the local housing stock towards small homes.

Paragraph 4.12.7 relates to the protection of houses in multiple occupation. The Council supports this paragraph, but does not consider that it relates to Policy H12 on Housing size mix. We consider that this paragraph should be moved to form part of the supporting paragraphs to Policy H10 Redevelopment of existing housing and estate regeneration.

Policy H13 Build to Rent

The Council generally supports more development of homes built specifically to rent and the provisions of Policy H13.

Policy H14 Supported and specialised accommodation

The Council generally supports the development of supported housing dedicated to groups with particular needs and the provisions of Policy H14.

However, we are concerned about the general reference in Criterion A (2) to accommodation for young people, as this could be interpreted as support for student housing, and 'co-living' schemes which are effectively equivalent compact living developments aimed at a wider range of young people. We consider that Policy H14 and the supporting text should be clarified to indicate that these provisions relate to dedicated provision where occupation is restricted to a specific groups with specialist housing needs, and provide cross-references to the policies providing for wider groups of students and other young people, namely Policy H17 Purpose-built student accommodation and Policy H18 Large-scale purpose-built shared living.

Policy H15 Specialist older peoples' housing

The Council generally supports the provisions of Policy H15 and the aim to develop more specialist housing aimed to older people.

However, we are concerned by the references to Use Class C2 and Use Class C3 in Criteria B and C. The Use Classes are defined by the Town and Country Planning (Use Classes) Order 1987 (as amended), and interpreted through case law. The interpretations we have seen suggest that retirement communities broadly equivalent to extra care or assisted living may be viewed as falling within Use Class C3, Use Class C2 or Sui Generis, depending on the level of care offered, the restrictions on those able to occupy the development, and the extent and nature of the supporting facilities. Development plans are not able to introduce their own interpretation of the Use Classes Order, and therefore the attempt in Policy H15 to specify that extra-care accommodation is in Use Class C3 and residential nursing care accommodation is in Use Class C2 is likely to prove ineffective.

The Camden Local Plan 2017 considers that the extent to which affordable housing and accessible housing should be sought should be based on whether or not the housing for older people is self-contained. On the basis of the Glossary of Terms for the 2011 Census, 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. This approach is broadly consistent with the approach adopted by the Mayor's Housing SPG March 2016, and we consider that a similar approach should be taken by London Plan Policy H15.

The Council proposes that:

- Criterion B should be amended to indicate that specialist older persons housing that is self-contained should deliver affordable housing and accessible housing; and
- Criterion C should be amended to provide the definition of self-contained houses and flats given above, and/ or indicate that sheltered and extra care accommodation generally refer to schemes that contain self-contained homes and should comply with Criterion B, but Criterion B does not apply to development where occupiers do not have sole use of a kitchen, bathroom and toilet, such as residential nursing care accommodation.

For consistency, equivalent amendments should be made to the supporting paragraphs.

Policy H16 Gypsy and traveller accommodation

The Council agrees that that the London Plan should seek to make provision for the accommodation needs of travellers, but does not consider that the provisions in criteria B and D of Policy H16 are appropriate or consistent with national policy.

In particular we object to the use of a distinct London Plan definition to require boroughs to plan to meet specialist needs of:

- those who have ceased to travel permanently;
- those who have a cultural preference not to live in bricks and mortar accommodation.

We object to the inclusion of those who have ceased to travel permanently because their inclusion directly contradicts the national definition provided in the Planning Policy for Traveller Sites (PPTS), which was amended in 2015 to exclude this group. In effect, Policy H16 redefines travellers to include people who do not have a nomadic lifestyle, and therefore do not need specialist accommodation to support it.

We object to the inclusion of 'preference' for a particular accommodation-type in the definition because 'preference' is not currently considered to be an aspect of housing need for any group, and its inclusion could have far-reaching implications. There are many other groups, including other groups who have protected characteristics in terms of the Equality Act 2010, who would have some justification for claiming a preference for a particular housing type.

We consider that the London Plan Policy H16 and the accompanying Gypsy and Traveller Accommodation Topic Paper 2017 are based on a misconception of which aspects of eligibility arise from the definition in the Planning Policy for Traveller Sites (PPTS), and which aspects arise from an interpretation of that definition based more broadly on case law. We appreciate that a number of need assessments have adopted an interpretation such that a traveller is only eligible for inclusion in the assessment if he/ she has regularly spent periods living in another location for work or economic purposes, and we recognise that many travellers find it very hard to demonstrate that they satisfy this test. However, the test is not intrinsic to PPTS definition.

It is perfectly possible for a needs assessment to be carried out on the basis of the PPTS definition whilst adopting a broader and more sensitive view of what constitutes travelling. In this respect, we note that PPTS indicates in paragraph 7 that authorities should cooperate with travellers, their representative bodies and support groups to understand accommodation needs, and we note that PPTS Annex 1 indicates that factors to be considered in determining whether persons meet the definition of gypsies and travellers include any previous nomadic habit of life, reasons for ceasing that, and any future intention to adopt a nomadic habit of life. The Council would not object to guidance in Policy H16 or supporting paragraphs that when needs assessments are carried out, these should be sensitive to the cultural traditions of gypsies and travellers, and should not take a narrow economic view of what constitutes a traveller.

The London Plan's proposed definition would be likely to lead to a significant increase in the assessed need for pitches. The effect of the definition would be that any individual or household could state a cultural preference not to live in bricks and mortar accommodation, and boroughs would need to plan to meet that preference. This would create expectations that simply cannot be met in terms of site availability and cost. The Mayor's estimate that there are 30,000 gypsies and travellers in London contrasts markedly with the 2011 Census count of 8,196 usual residents who identified as gypsies or Irish travellers.

The London Plan's proposed definition would be likely to lead to a significant increase in the assessed need for pitches. Preference for a particular accommodation-type does not usually form part of a definition of housing need, and could create expectations that simply cannot be met in terms of site availability and cost. The Mayor's estimate that there are 30,000 gypsies and travellers in London contrasts markedly with the 2011 Census count of 8,196 usual residents who identified as gypsies or Irish travellers.

In Camden, feasibility work carried out by officers suggests that minimum pitch sizes would need to be around 150 sq m to 200 sq m in order to accommodate a mobile home (or alternative light weight construction), a utility block and touring caravan. This site coverage is equivalent to a residential density of around 60 homes per hectare, which is extremely low compared with residential sites in and around Central London. A London Plan requirement to house a much larger number of households at this density is not consistent with other London Plan provisions seeking to make efficient use of land (such as Policy D6 Optimising housing density and Policy H1 Increasing housing supply), will make it almost impossible for Central London boroughs to bring forward local plans that are in general conformity with the London Plan in terms of provision for gypsies and travellers, and will harm the ability of LB Camden and other boroughs to deliver the number of homes envisaged by London Plan Table 4.1.

Our feasibility work also suggests the value of land needed for each pitch could be £830,000 to £950,000, and the income generated would be negligible. If provided on Council land that would otherwise be developed (or sold for development), this represents a significant financial loss; if provided on a private development site this would severely diminish our ability to secure other public benefits such as affordable housing. While the GLA has offered financial assistance towards provision and refurbishment of pitches, the cost of GLA funded schemes from 2011-15 ranged from £11,000 to £110,000 per pitch (average £49,000), which is a fraction of the likely cost of a pitch in the Borough.

The Council considers that the Mayor should collaborate with boroughs to carry out a new pan-London assessment of pitch needs on the basis of the national definition of gypsies and travellers. The Council also proposes that the Mayor should work with the boroughs to consider how needs can be met on a pan-London basis, and should provide meaningful assistance towards meeting those needs in terms of making suitable GLA land available and/or in terms of providing grant levels commensurate with the cost of providing land and delivering fully serviced pitches with utility blocks.

As stated above, the Council would not object to inclusion in the London Plan of guidance that when needs assessments are carried out, these should be sensitive to the cultural traditions of gypsies and travellers, and should not take a narrow economic view of what constitutes a traveller.

Policy H17 Purpose-built student accommodation

The Council acknowledges the huge economic and employment role of higher education in the Borough, and supports the provision of additional residential accommodation for higher education students. The Council generally supports Policy H17, which is consistent in most respects with the approach to student accommodation set out in the Camden Local Plan 2017.

However, the Council is concerned that the providers of student housing will consider the requirements of Policy H17 to be unduly onerous compared with the requirements of the London Plan as published with amendments in March 2016. The 2016 London Plan required student accommodation to subject to nominations agreements with one or more institutions, or to provide an element of affordable student accommodation, but not both. Policy H17 requires in all cases that the majority of bedrooms should be subject to nominations agreements and the scheme should provide 35% affordable student accommodation.

Supporting paragraphs indicate that where the accommodation is not subject to nominations agreements, it will be considered as large-scale purpose-built shared living.

The Council is concerned that this doubling-up of requirements may deter further investment in purpose-built student housing, and divert it into general purpose shared housing available for short-term lets (this is an emerging model, e.g. see www.thestayclub.com). The unintended consequence of the additional requirements could be a worsening supply of dedicated student housing relative to demand, and a 'casualisation' of student accommodation arrangements where students compete with young professionals, working visitors and tourists to let rooms on a short-term basis.

We accept that where affordable student accommodation will be provided, this could helpfully be linked to one or more specified institutions to provide a simple mechanism for identifying suitable occupiers who will benefit from reduced costs. However, where the affordable accommodation is in place, we don't consider that it is necessary for the remaining accommodation to be tied to specified institutions.

We therefore propose that Criteria A(3) and A(4) should be amended to form either/ or options, with A(3) providing for all the accommodation to be linked to specified HE institutions, and A(4) providing the alternative of at least 35% accommodation secured as affordable and allocated to suitable occupiers (e.g. by linking the affordable accommodation to specified HE institutions).

We also note that Criterion A(3) indicates that the accommodation should be occupied by members of one-or-more specified HE institutions, whereas paragraph 4.17.3 states that the majority of bedrooms must be covered by such an undertaking. These provisions are not consistent, especially bearing in mind that 'the majority of bedrooms' could refer to as few as 51%. If Criterion A(3) can be satisfied by less than 100% of bedrooms being tied to specified HE institutions, the minimum acceptable percentage should be specified in paragraph 4.17.3.

Paragraph 4.7.12

Paragraph 4.7.12 provides for student accommodation to be used on a temporary basis by other occupiers during vacations, subject to conditions ensuring that there is no material change of use of the building. We note that paragraph 6.10.4 also supports the use of student halls as visitor accommodation during university vacation periods, but adds the proviso that the accommodation should be in appropriate locations and the use should not disrupt the daily lives of resident students and their academic calendar. We consider that this helpful guidance should also be incorporated in paragraph 4.7.12, or cross-references and links should be provided to connect paragraphs 4.7.12 and 6.10.4.

Policy H18 Large-scale purpose-built shared living

The Council is not convinced that large scale purpose-built shared living has a role in LB Camden, given the relatively small scale of development sites coming forward in the Borough and the acknowledged needs for self-contained homes and dedicated student housing. The Council is also concerned that such models could encourage a 'casualisation' of accommodation arrangements for young people, where students and young professionals compete with working visitors and tourists to let rooms on a short-term basis.

In this context, the Council generally welcomes Policy H18 as providing a set of parameters to judge any proposals. In particular, the Council welcomes the inclusion of management requirements, a minimum tenancy length of 3 months, and a contribution to affordable housing.

However, the Council considers that Policy H18 and/ or paragraph 4.18.6 should make reference to the minimum standards for houses in multiple occupation (HMOs) adopted by many boroughs.

As drafted, paragraph 4.18.6 indicates that "There are currently no minimum space standards for these units", however boroughs are empowered adopted minimum standards for HMOs under the Housing Act 2004. For the purposes of the Housing Act 2004, a development of large-scale purpose-built shared living constitutes an HMO. The detailed definition of HMOs is contained within the Act, but broadly speaking an HMO is a property occupied by three or more persons (including children) who form more than one household. Although the requirements of the Housing Act are distinct from planning controls, a requirement to comply with HMO standards is frequently included in local plans, as it is in the case of the Camden Local Plan 2017 (Policies H9 and H10).

The Council notes that the Criterion A (1) sets a criterion that developments should meet an 'identified need', whereas paragraph 4.18.2 indicates that they should meet an 'identified market need'. The Council suggests that the terminology used should be consistent, and the nature of the test should be clarified; is the GLA proposing a test of whether there is a housing need in the area that can best be met by this form of housing, or is the GLA proposing a test of whether there is sufficient market demand to ensure that this form of housing will be occupied?

The Council has some concerns that the arrangements proposed for affordable housing contributions in Policy H18 and paragraphs 4.18.7 to 4.18.9 may not be possible to implement. The Council therefore suggests that the policy should simply provide for boroughs to accept a payment equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent.

In particular the Council doubts that it would be practical to enforce ongoing affordable housing payments in perpetuity. The Council also notes that there is very little data available that would enable rental costs to be compared per square metre. Policy H10 of the Camden Local Plan 2017 includes an option for HMOs to be provided as 100% low cost housing, considered to be at least 20% below the median rent of studio flats, and the Council considers that the London Plan could helpfully provide for a similar approach.

Chapter 5 Social Infrastructure

Policy S1 Developing London's social infrastructure

Camden supports the objective of developing social infrastructure outlined in policy S1. The policy is generally consistent with Camden's approach and we are using section 106 and CIL to secure and expand provision of social facilities. However, as the Mayoral CIL will divert funds away from this form of infrastructure a balance needs to be struck between the level of that charge and impact on funding for social infrastructure at the local level. The viability evidence supporting both this policy and the Mayoral CIL needs to demonstrate that meaningful funding for affordable housing, transport and social infrastructure can be secured without deterring development.

Criterion F and paras. 5.1.5 and 5.1.6 - To ensure consistent application of the policy, the Plan should be clear whether, when the loss of a facility forms part of a public service transformation plan, other forms of social infrastructure should be sought.

The London Plan should highlight here how health and wellbeing is considered across the London Plan, including good quality affordable housing, opportunities for physical activity including active travel, access to healthy food, and opportunities for social interaction.

Paras 5.1.8 Co-location of facilities

See also comment on policy GG2 F - Welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

Policy S2 Health and social care facilities

This policy should state that rents for health and social care facilities in private developments should be provided at affordable levels. If this is not the case, the long term provision of these facilities in private developments cannot be guaranteed. Health and social care provision also needs to be factored into the balance of what should be delivered through planning obligations.

Camden supports the principle of colocation of health facilities, although it is important to be aware of the complexities of making this happen in practice because of the different funding and decision making structures/arrangements of different providers/organisations.

Criterion A - Boroughs should work with their CCGs to understand the implications of lease expiry on primary care premises leased from the commercial centre, as well as impacts on the primary care estate of retiring single-handed practices where the GP owns the premises.

Criterion A (5) - Welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

Policy S3 Education and childcare facilities

Camden supports the approach to education set out in policy S3 and the funding of this provision is a section 106 and CIL priority. However, the need to fund this provision may affect the ability to fund some other forms of social infrastructure, which may undermine other policies in this section of the Plan.

Criterion A (3) - We support the principle that residential and commercial developments, where there is a need, contribute to childcare provision. However, the policy should give an indication of the size of schemes it is intended to apply to. It may not be realistic or viable for smaller developments.

Criterion B - The Plan could be strengthened by encouraging boroughs to consider health services in early years settings, particularly co-location of health visitors, breastfeeding support, etc..

Policy S4 Play and informal recreation

Criterion B (2) - The Council does not consider a standard of 10sqm per child for playspace provision is realistic or deliverable for an area such as Camden where a considerable component of the borough's housing supply is from small to medium sized sites, which will often be already developed.

The 10sqm appears as an indicative benchmark in the Mayor's Play and Informal Recreation Supplementary Planning Guidance; however, in practice it has not been possible to deliver this for the vast majority of schemes in the borough. The London Plan elevates this to a policy requirement which the Council does not support. Policy 3.6 of the current London Plan allows boroughs to establish how much play and informal recreation provision would be required based on local circumstances, stating this would be based on "the expected child population generated by the scheme and an assessment of future needs". The existing Plan also recognised the role of individual boroughs' playspace needs assessments and strategies being used to inform boroughs' policy requirements. This contrasts with

prescriptive approach of the Draft London Plan which introduces a requirement regardless of whether it is deliverable or supported by evidence boroughs have gathered to support their local plans. Successive open space evidence studies commissioned by Camden attest to the difficulty of providing new areas of open space, including playspaces, in a densely developed area. We therefore request that the more flexible approach in the current London Plan is retained.

The 10sqm figure for playspace is higher than the standard of 9sqm per occupant for all types of public open space in Camden's adopted Local Plan, which includes amenity areas and natural green space, as well as playspace. This standard has operated successfully in Camden since 2006 and is based on local evidence of Camden's particular circumstances and was again found sound at the recent examination into the Camden Local Plan. The London Plan should therefore state that boroughs are able to determine an appropriate playspace standard based on their individual characteristics, informed by local evidence studies.

If the standard is retained, the supporting text should state that it will only be sought in major schemes proposing an increase of 100 dwellings or more.

Due to the lack of evidence and extreme unlikelihood of this target being deliverable or appropriate for circumstances in some boroughs, we consider the 10sqm standard is also likely to raise issues in terms of compliance with statutory tests for developer contributions because it will not be "fairly and reasonably related in scale and kind to the development" (paragraph 204 of the National Planning Policy Framework).

Criterion B(2) - It should be recognised that different age groups may have competing interests in recreational space, and this needs to be taken into account when designed.

Criterion B (4) and Para 5.4.3 - The policy should be clear that incorporating incidental playspace will not remove the need for developers to provide an appropriate level of formal provision where borough standards/requirements apply. There is a risk that developers will try to maximise the provision of informal space at the expense of formal space when a mix is likely to be appropriate on most sites.

Camden Council gives priority to delivering formal, equipped play facilities. Generally, we will only expect informal play provision where it has been demonstrated that equipped provision will not be appropriate. This is because open spaces, such as amenity areas, being secured as part of a development will already often provide opportunities for informal play.

The Plan should state that the appropriate balance of play provision should be for boroughs to establish through their own policies and supplementary planning guidance and when taking the circumstances of individual schemes into account.

This policy should recognise that very young children are accompanied by adults, and therefore that the needs of supervising adults should be taken into consideration, e.g. somewhere to sit and interact socially with other parents/grandparents/carers whilst supervising children, as highlighted by paragraph 5.4.4

Policy S5 Sports and recreation facilities

Criterion b (4) - For consistency with the overarching approach to social infrastructure set out by S1, this policy should acknowledge that there may be opportunities for co-location/clustering of facilities and it may not always be viable to retain existing provision in its current form.

Para 5.5.1

"Many activities require minimal facilities, and often an open space or community hall can be sufficient" – while this may be true, they will normally need to be of a reasonable size and quality to ensure they are viable and fit for purpose over the long-term. Camden expects developers to provide detailed information showing a new community hall or public open

space plan to show how a facility is intended to be used and operate. Generally, facilities should deliver a range of benefits and be multi-functional.

Policy S6 Public toilets

This policy is welcomed.

Chapter 6 Economy

Policy E1 Offices

Camden supports the objectives of this policy. Consolidation of diverse office markets may have an impact on the affordability of office floorspace and the diversity of location.

Policy E2 Low cost business space

The provision and protection of low cost B1 business space is supported.

The policy requires the applicants to demonstrate that where the proposal involves loss of B1 floorspace, suitable alternative B1 accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development. This approach assumes that the businesses which are affected by the proposal are in need of relocation support. Therefore, as drafted it may put unnecessary burden on the applicants to provide support to those which do not need it.

Criterion C requires proposals for new B1 business floorspace greater than 2,500 sqm (as opposed to Camden's 1,000 sqm threshold) to consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. It is stated that what constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case. Although the flexible nature of this policy may benefit discussions with the applicants it does however create a level of uncertainty with regards to what is acceptable and what is not.

The Draft Plan states that evidence to assess the reasonable prospect of workspace being used for business purposes in cases where redevelopment is proposed should evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). Camden's policy approach expects 24 months of marketing evidence. It would be helpful if the wording of the Plan clarified that boroughs can seek evidence over a longer period where they consider it appropriate based on local circumstances.

In addition the Plan should specify that submitted evidence should demonstrate that premises have been marketed at the right prices/terms and through the right channels, related to the nature of the site and its locality.

Policy E3 Affordable workspace

This policy is supported. However, the requirement for the affordable workspace elements of a mixed-use scheme to be operational prior to residential elements being occupied may delay delivery of housing.

The policy should be more explicit as to what rental levels and lease arrangements constitute affordable space. Without this it will be difficult for Boroughs to secure and effectively monitor the provision of this affordable space on an ongoing basis.

Policy E4 Land for industry, logistics and services to support London's economic function

The objectives of this policy are supported.

Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function

The objectives of this policy are supported. We appreciate that it is important for the Plan to seek to guarantee the provision of the employment use. However, the requirement for replacement industrial, storage and distribution uses to be operational in advance of any residential component being occupied may harm the delivery of large sites which are likely to be delivered in phases due to site/delivery constraints and we therefore suggest the wording should be amended to avoid this unintended outcome.

Policy E8 Sector growth opportunities and clusters

This policy is supported and reference to the MedCity cluster is welcomed.

Policy E9 Retail, markets and hot food takeaways

Criterion B (4) Particularly support as many older people shop daily because this is a reason for going out and socially interacting with others.

Criterion C (takeaways) - Strongly support resisting new hot food takeaways within 400m of a school, as well as resisting overconcentration. Camden has previously sought to introduce a similar policy through its Local Plan.

Para 6.9.5

Over-concentrations of some uses such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing and for this reason the Plan should recommend that applications for such uses are subject to a health impact assessment.

Para 6.9.8

Agree that the Healthy Catering Commitment can play a key role in improving the food offer, and encourage the Mayor to raise the profile of HCC across food businesses in London.

Policy E10 Visitor infrastructure

The objectives of this policy are supported. However, Camden does not support permanent conversion of existing homes to short-stay accommodation intended for occupation for periods of less than 90 days.

The policy requirement for wheelchair accessible rooms should also state in what circumstances and to what size schemes it should apply. It may be viable or appropriate for proposals involving change of uses to existing buildings to implement these requirements.

Policy E11 Skills and opportunities for all

The objectives of this policy are supported.

Chapter 7 Heritage and Culture

Policy HC1 Heritage conservation and growth

The core principles for protecting heritage assets and their settings are in line with the National Planning Policy Framework. The greater recognition of non-designated heritage assets is welcomed.

The aspiration for securing the "highest standards of modern architecture" alongside the built heritage is also welcomed.

Policy HC5 Supporting London's culture and creative industries

We strongly support the objectives of protecting existing cultural venues and facilities and finding suitable sites, spaces and premises to support new cultural uses. The richness of

London's cultural offer is mirrored by the range and diversity in Camden, particularly represented by Camden Town and its live music scene and the West End (about a third of which is within Camden). Camden is also home to a wide range of creative industries and therefore the acknowledgement in paragraph 7.5.1 of the link between these and the cultural offer is welcomed. Camden's recently adopted Local Plan includes a policy that seeks to protect the Borough's cultural assets. We have consulted on supplementary planning guidance which provides detailed advice for applicants on how the Council will protect culture and leisure uses and highlights particular planning considerations applicable to specific types of cultural and leisure use.

Paragraph 7.5.5

The text should acknowledge that a replacement facility may sometimes be a last resort once all avenues for retention of the existing premises have been exhausted. Camden's Local Plan states in paragraph 4.62 that the *"scope for re-providing cultural and leisure facilities is constrained by factors such as cultural history, including associations (e.g. with prominent people or important periods or events) or experience, where these are intrinsic to a particular premises, as well as the benefits an attraction may enjoy from being located close to other cultural and leisure uses"*.

Camden Local Plan paragraph 4.57 recognises that cultural facilities can be heritage assets and that *"the civic importance of buildings, such as theatres and music venues, is often reflected by the quality of their architectural design and internal fabric and fittings"*. Many of Camden's cultural facilities are within listed buildings where the National Planning Policy Framework advises that *"heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance"* (para. 162) and *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation"*. We therefore suggest the following amendments to the text para 7.5.5:

"The loss of cultural venues... Assets of Community Value. Boroughs should also consider whether alternative cultural uses would avoid, or minimise the impact on the significance of a heritage asset, including its cultural value. Where a development proposal leads to the loss of a venue or facility, and having examined the feasibility of the existing facility continuing to support a cultural use, boroughs should consider requiring the replacement of that facility or use".

Policy HC6 Supporting the night time economy

The Council supports the objectives of protecting and promoting the night time economy.

We recognise the very significant contributions made by night time uses to the economy, the identity and attractiveness of London and quality of life. However, many residents also live within town centres or on the edge of these areas and councils have an obligation in discharging their planning functions to determine the impact of proposed night time activities on sensitive uses, such as residential. Particular care has to be taken when it is proposed that day or evening activities are extended to the early hours of the morning. The London Plan should therefore more clearly recognise that new night time uses need to be well managed and consider of impact on local residents.

Criterion B 6) could be misinterpreted as providing unqualified support for the uses listed.

Regarding the potential implications of areas being presumed as suitable for 24 hour activities due to an existing cluster or concentration of night-time economy uses, the impacts of night time uses on residential accommodation needs to be assessed on a case-by-case basis and we agree that *"boroughs should balance the needs of residents with the economic benefits of promoting a night-time economy"*. This would apply to all relevant planning applications. The supporting text in paragraph 7.6.2 should be clear that this 'balancing test' applies regardless of whether a development is located outside or within one of the centres

shown in Figure 7.7. Promotion of night time activity must also include the need to fully consider impacts on residential amenity and the locality.

The ability to intensify night time activity will also be contingent on other legislation, including licensing controls, in particular in “cumulative impact” zones. This would include Camden Town which the Draft Plan identifies as an area of “international/national significance”. The ability to deliver a “24-hour city” throughout Camden Town needs to consider licensing policy and impacts on residential amenity. As drafted, the Plan’s wording creates a concern that quieter streets or areas within/near centres with a residential character are considered by the Mayor to be suitable locations for 24 hour uses, or might be put under pressure to accommodate such uses. This concern could be overcome by amending the wording to make clear that proposals for greater 24 hour working should fully consider management arrangements and the impacts on local residents.

We welcome the policy’s recognition of the economic benefits of the night time economy. Its positive social effects should also be recognised. Many night time uses including music venues, nightclubs, theatres and pubs provide immense social and cultural benefit, often allowing people from different communities and social backgrounds to meet. This contributes to London’s social integration and diversity. Some venues will also be important in providing meeting places for people with protected characteristics, e.g. older people and LGBT communities. These social benefits are acknowledged in Camden’s draft planning guidance on “Community uses, leisure facilities and pubs”. We suggest that the London Plan includes acknowledgement of both the *social* and economic benefits of night time uses as well as recognition of impacts on residential amenity and the character of the area. This is necessary for the decision maker to reach a balanced judgement concerning the merits of a proposed scheme.

Paragraph 7.6.2

Suggest that paragraph 7.6.2 clarifies that consideration of the acceptability of night time uses must take into account potential impacts on the amenity of those living nearby and the surrounding area, regardless of whether the proposed scheme is located within the centres shown in Figure 7.7. Particular care should be applied to 24 hour uses which are likely to have a much greater impact on residents than activities which end before/around midnight.

Policy HC7 Protecting public houses

Camden strongly welcomes the Mayor’s approach to protecting pubs. We agree that they provide multiple benefits, in particular strengthening of social ties and reducing isolation. We also welcome that the policy acknowledges the threat to the continuing viability of pubs from the loss of particular elements, such as meeting rooms and beer gardens, which can be vital for their success. Policy HC7 is very closely aligned with Policy C4 of Camden’s recently adopted Local Plan. We, therefore share the Mayor’s objectives for the safeguarding of pubs and consider the need for a robust planning approach to be essential.

The Plan should, however, make it clear that the new London Plan policy does not supersede existing detailed borough policies on pubs where these are based on local circumstances and up to date evidence and are consistent with the objectives of the London Plan; rather that the policies should operate together in a mutually supporting and complementary way. Without this, the adoption of the London Plan will lead to a reduction in the ability of boroughs to implement more detailed or locally specific policies that contribute towards delivering the policy objectives of the Mayor.

Criterion B. The loss of historic pubs is a cause for concern. The strengthening of policy preventing the loss of pubs on heritage grounds is welcomed and will give greater weight to council decisions.

Paragraph 7.7.8 – the word “or” in the final sentence appears to inadvertently weaken the otherwise strong protection provided by the policy. Where the loss of part of a public house

is proposed, the acceptability of the proposal should be determined taking into account the impact on viability and the pub's community role. This assessment should not be removed simply because noise mitigation measures are provided, which the text currently implies. The following amendment to the text is suggested: "~~Boroughs are encouraged to resist such proposals~~ assess the impact of such proposals ~~or~~ and ensure developers put in place measures...residents".

Chapter 8 Green Infrastructure and Natural Environment

General Comments

This chapter should also address the issues around the management and maintenance of privately owned / managed public open space. Camden Council through its Public Open Space supplementary planning guidance expects that, where open space is to be privately managed, the proposed management arrangements to be made publically available and there will be a presumption these will be equivalent to by-laws applicable to open space the Council maintains unless the applicant can demonstrate appropriate reasons for not doing so.

Policy G1 Green infrastructure

Criterion B and Para 8.4.2 - The Council strongly supports increases in green infrastructure and has a number of policies seeking to increase greening in the Camden. Resource constraints are likely to mean it will not necessarily be possible for boroughs to develop Green Infrastructure Strategies as promoted in the Draft Plan. A quicker and more cost effective route for boroughs may be to participate in a review of the sub-area frameworks of the All-London Green Grid that are applicable to their area, as many of the key opportunities for establishing, or extending, green infrastructure networks are already set out in these frameworks. Potentially, this could include greater detail / updates about individual projects and proposals at borough level.

Paragraph 8.1.2

This paragraph could be strengthened by referencing the evidence that green space has a beneficial effect on health and wellbeing.

Policy G4 Local green and open space

Criterion E (1) - This matter is not relevant solely to areas where deficiencies currently exist. Growth in numbers of residents, workers and visitors will place additional pressure on existing spaces in London. They will therefore need to be protected as a resource to address future needs. Open spaces in inner London areas such as Camden are a finite resource and it is difficult to secure significant new areas of ground level open space.

Criterion E (2) - "with the potential for substantial change" - while this is supported, the Plan should be clear that green and open space contributions should be required for all developments subject to the need they generate. This can be used to fund new open spaces or to enhance existing provision.

Criterion E (3) - Camden already seeks many of the elements set out in Table 8.2 where it is feasible to do so. It is unclear whether the approach in the Draft Plan will be effective in delivering significant levels of biodiversity gain. To be certain it will lead to more green infrastructure, the policy needs to make clear that these greening measures are additional to borough's open space requirements. Greening measures should not be used as a substitute for development contributions which may otherwise be used to mitigate the impact of a scheme on existing open spaces.

Camden Council, through its planning policies, requires developers of all major applications to provide green roofs unless it can be demonstrated this would not be feasible or

appropriate. The current London Plan states that “*development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity*”. Camden has been able to establish what types of enhancement are appropriate in the borough through supplementary planning guidance, which itself has been informed by the Borough’s Biodiversity Action Plan. The package of enhancement measures will generally be proportionate to the scale of development/ size of site. Within this framework, planning officers are able to negotiate site appropriate measures. For example, on the recent Camden Goods Yard development (one of the largest schemes to be granted planning permission in recent years) the Council is securing a community managed wildflower meadow – this is equivalent to Factor 1 in Table 8.2 of the Draft Plan. There would appear to be a risk that the interim target scores set in Draft Plan Policy G5 will artificially reduce the number of enhancement measures councils will be able to achieve, as developers will benchmark against the interim standards. It would be difficult for the Council to argue there is an opportunity to deliver more on a site, if applicants can point to the Draft London Plan threshold having been met.

We also have a concern about the ability of the interim thresholds to be achieved where no green roof will be provided. On many sites, it will not be practical to provide the types of green suggested due to site characteristics. Measures such as trees and hedges (due to the site area covered) are likely to have a limited impact on the overall urban greening factors applied to a scheme. Rather than introducing, a policy requirement at this stage – which seems to give a unjustifiably high rating for amenity grassland - we consider it would be better to defer the setting of factors to the boroughs, allowing area wide circumstances to be taken into account. It would also be helpful if the policy could provide assurance that offsets, such as tree planting, in a different part of a borough to the site of the proposed scheme, comply with the statutory tests set out in paragraph 204 of the National Planning Policy Framework.

Currently boroughs can negotiate what is appropriate for a site taking into account the precise nature of the scheme, how it will be occupied and managed and circumstances of individual sites and buildings. It is vital that the urban greening factors cannot be used as a way for applicants to justify they do not need address the impact of their occupants on existing public open spaces.

Policy G6 Biodiversity and access to nature

Criterion C (2) - “minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site”: this is potentially too permissive. Many SINC’s (for example in Camden) are small and vulnerable to quite minor changes. Once land has been developed, the opportunity for it to be restored and contribute to biodiversity gains is lost forever. As worded, this criterion could be interpreted as supportive of partial development of SINC’s, which we do not support. The extent of deficiencies in access to nature conservation in inner London boroughs such as Camden means that the value of even the smallest sites becomes significant.

Policy G7 Trees and woodlands

Criterion A - “Trees and woodlands should be protected” – the supporting text should qualify that not all trees are of equal value. For example, it will not always be appropriate to protect dead or dying trees. Also it may be possible to increase biodiversity value through removing existing species and planting replacement native trees or trees with greater mass.

Criterion C - This is useful clarification in relation to criterion A by emphasising that it is “trees of quality” that should be retained. While we would normally seek replacement trees, it must be acknowledged that this will not be possible for every site. It could be argued by developers that there is no obligation for them to provide replacement planting when existing

trees are dead or diseased or have low biodiversity or amenity value. A council's ability to secure replacement planting is likely to depend on an evaluation of each individual trees merits following the principles and practice of BS 5837.

Chapter 9 Sustainable Infrastructure

Policy SI1 Improving air quality

Given the evidence of impact on poor air quality on health, the Council welcomes the provisions within the Policy which seek to improve air quality beyond that of the adopted London Plan, particularly regarding the aim for Opportunity Areas and EIA developments to be air quality positive. We note however that the policy is less prescriptive than Policy 7.14 of the current London Plan, presumably the intention of which is to enable innovation with regards to delivering 'design solutions' to meet the increased targets.

Camden considers that further policy support from the Mayor regarding how air quality targets could be met would be helpful. We therefore welcome para 9.1.11 which includes a commitment by the Mayor to publish guidance regarding how air quality positive and neutral standards could be met. The guidance should include details of permanent features of the building that could be acceptable and details regarding offset payments (referred to in para 9.1.9).

Para 9.1.2

The Plan should recognise that there is no medically recognised "safe limit" for levels of airborne particulate matter. Rather than developments being expected to "endeavour to maintain the best ambient air quality" we would welcome additional NO₂ and PM targets where legally feasible. This could provide a second tier of standards for developments, as air quality levels improve.

Para 9.1.3

This approach set out in para 9.1.3 is welcomed. Developments with above-average emissions (either absolute or relative to floor area/dwellings) should also be considered for inclusion as schemes that should aim to be air quality positive.

The minimum air quality positive requirement should be quantified, e.g. x% improvement against emission benchmarks. An air quality positive offset fund could then be established to help deliver measures in lieu of developers' own offsite measures. However, the price would need to be set at a suitable level to encourage developers to deliver measures themselves in the first instance.

Para 9.1.4

Camden generally requires a detailed AQA to be submitted with a major planning application and minor applications in existing critical AQ areas or having critical AQ impacts. A two-stage process should not be introduced at the expense of diluting the initial information requirements at the planning application stage, when councils have most ability to influence development schemes.

Para 9.1.5

A revised AQA is often necessary in light of post-consent changes at detailed design. We welcome the default two-stage process so long as the second assessment does not reduce the detail and weight placed on the first.

Para 9.1.6

We welcome standby generators being included in assessments. Existing generators should be included for proposals involving new construction or refurbishment. Assessment should also apply to any sites which include Short-Term Operating Reserve (STOR) generating equipment.

Para 9.1.7

Camden favours use of LAEI data in AQ Assessments over the lower resolution Defra national data and suggest the Mayor backs this approach.

Para 9.1.8

It is not clear whether there is to be different treatment of proposals in air quality focus areas and, if so, what this would be.

Para 9.1.9

In our experience, schemes failing to reach AQ Neutral standards has not been a widely encountered issue. We would not support the introduction of offsetting payments to reach Air Quality Neutral, since (unlike e.g. carbon offsets) the excess air pollution would affect human receptors in the locality of each specific development. Offsetting procedures would by definition risk failing to mitigate the development's specific health impacts.

Para 9.1.10

See our comments to para 9.1.2 above.

Para 9.1.11

We welcome the intention to publish further guidance on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts.

Policy SI2 Minimising greenhouse gas emissions

The Council welcomes the Mayor's policy which now applies the zero carbon target to non-residential major developments. This will enable the energy and CO2 of mixed use schemes to be assessed more consistently. To help achieve the zero carbon target however, the Council would like to see policy support for the use of feasibility studies so that any absence of renewable energy technologies within a development is fully justified.

Although the Council supports the principle of the targets cited in criterion C, the evidence supporting the policy indicates that non-residential developers in particular will find meeting these energy efficiency targets very challenging. We would therefore welcome a commitment from the Mayor to publish guidance regarding these targets; this would focus on the practical minimum demands around reporting (by applicants) and scrutiny (by councils) of the highly complex, building-specific factors lying behind reported (in-)ability to comply.

Camden supports consideration of energy cost to future occupants at the planning stage. We suggest publication of an acceptable calculation and reporting methodology, in order to simplify comparisons prior to building design stage.

In order that targets are achieved following completion of a building, we would like to see the Mayor give stronger policy support for the installation of energy metering/monitoring equipment.

In order to help Boroughs to secure the delivery of a carbon-offset fund more clarity would be helpful in terms of how this is intended to operate alongside the CIL regulations in terms of the definition of infrastructure and the pooling restrictions affecting s106 agreements.

Policy SI3 Energy Infrastructure

The Council welcomes the Mayor's commitment to continue the existing approach in relation to securing energy infrastructure.

Within the context of evidence published recently regarding the increased decarbonisation of the national grid, we welcome that criterion D places CHP lower down the hierarchy of preferred communal heating systems. Camden believes that non-CHP-led district energy networks could suffer in uptake due to lesser commercial viability and requests further

guidance on balancing the twin priorities of growing district energy networks whilst minimising the air quality impacts of CHP.

Policy SI4 Managing heat risk

We welcome the continued use of the energy hierarchy as means of reducing overheating.

Policy SI6 Digital connectivity infrastructure

The recognition of the importance of digital infrastructure is welcomed.

Policy SI7 Reducing waste and supporting the circular economy

Support for the circular economy is welcomed.

We support the new combined target of 65% recycling of municipal (household and business) waste by 2030, which replaces the previous separate recycling targets for each waste stream; however, the constraints to recycling in inner London should be noted.

Policy SI8 Waste capacity and net waste self sufficiency

Policy SI8 A.2 references policy SI9 but refers to safeguarding waste management sites rather than just waste sites. Given that “management” has a particular meaning in the London Plan, which excludes transfer stations, it would be useful if this wording was amended for clarity and consistency.

Para 9.8.7

This clarifies that land for apportioned waste includes sites and/or areas. However, it still requires boroughs to “allocate” and not “identify” this land. It is not possible to “allocate” areas for waste, therefore clearer wording is needed.

It also states that “*Mayoral Development Corporations should cooperate with boroughs to ensure that the boroughs’ apportionment requirements are met. This could be widened to cover boroughs in the relevant waste disposal authority.*” Camden works jointly with six other North London Boroughs to plan for waste. Parts of Hackney and Waltham Forest fall within a MDC and it would therefore be helpful if “could” was replaced with “should” in the last sentence.

Para 9.8.8

This says “*Large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them.*” It is not clear if this applies to all large-scale redevelopment opportunities or just those within SILs/LSIS. The wording therefore needs to be amended for clarity.

Policy SI13 Sustainable drainage

The Council supports the Mayor’s continued commitment to achieving greenfield run off rates and application of the drainage hierarchy.

Para 9.13.2

We would welcome guidance to confirm and reinforce the approach to sustainable drainage which will assist us in implementing our policies. This could incorporate stronger wording around greenfield run-off rates, for example a tightening up of the ‘backstop’ rate (currently 50% of existing), to be expressed instead in relation to greenfield rate, i.e. “greenfield plus 100%, or 50% of existing, whichever is lower.” We would also support additional compensatory measures being required when impermeable areas are expanded.

Policy SI14 Waterways – strategic role

This could be strengthened by referencing the evidence that London’s waterways have a beneficial effect on health and wellbeing.

Policy SI15 Water transport

Although we welcome the Mayor's continued support for the use of waterways to move freight, the Council has found it difficult to negotiate the use of Regents Canal to move construction materials in construction management plans secured through legal agreement – even at canal-side sites. We suggest that the policy should be amended to give support for feasibility studies so that decisions not to use waterways for the purposes of freight movement by water-side developments (either through construction or operation) are fully justified.

Policy SI16 Waterways – use and enjoyment

The Mayor's continued commitment to protecting and enhancing waterways and towpaths is supported. These can have beneficial effects on wellbeing of Londoners.

Chapter 10 Transport

Chapter 10 - general

Camden welcomes the focus of the draft London Plan on encouraging active travel, addressing air quality and the integration with the Healthy Streets agenda outlined in the Mayor's draft Transport Strategy (MTS) which we also support. In particular we support the target that 80% of all trips in London should be made on foot, by bike or public transport by 2041 and the need to rebalance the transport system to support these modes, to make them safer, more appealing and accessible.

Policy T1 - Strategic approach to transport

Camden fully supports the policy commitment to the importance of delivering the targets for sustainable travel, and making the most effective use of land to ensure that these modes are supported. However, we consider that delivering Healthy Streets and the targets for mode-shift require a two-pronged approach, providing facilities for active travel choices on the one hand but also minimising opportunities for inessential car ownership and use on the other. The strategic policy should therefore include an explicit commitment to minimise or restrict car ownership and use, in line with the draft Mayor's Transport Strategy (MTS). This would also provide the framework for other transport policies outlined in the Plan, particularly, for example, car free/ 'car-lite' developments and the new parking standards.

We strongly support the Mayor's approach to increasing active travel as this will have a demonstrable impact on improving healthy and wellbeing.

Policy T2 - Healthy Streets

For similar reasons to those above, Camden also supports and welcomes Policy T2. We particularly value the inclusion of 'lack of physical activity' as a potential harmful effect of traffic: this gives greater weight to the need to provide for walking and cycling outlined in the Plan, in addition to the measures which address air quality such as electric vehicles, and helps to make the case for minimising opportunities for car use.

We believe that the indicators of a healthy street can apply to many areas of public realm, including for example space around housing estates, as well as streets.

Paragraph 10.2.4

While Policy T2 does explicitly refer to reducing car ownership and use, as outlined in Section 10.2.4, the Plan only refers to 'reducing the dominance of vehicles through slower speeds and safer driver behaviour'. Camden considers that vehicle dominance is not only manifested through speed and dangerous driver behaviour; it is also a result of traffic volumes, the proportion of public space given to vehicles compared to other modes, as well as vehicle size. Section 10.2.4 should therefore refer to a range of measures to address all

of these dimensions of vehicle dominance, including for example, traffic restrictions, retiming deliveries especially those involving large vehicles (including construction vehicles), road space reallocation as well as parking policies, in line with the draft MTS.

Policy T3 - Transport capacity, connectivity and safeguarding

Camden supports the objectives of Policy T3 to increase public transport capacity and improve connectivity, which are vital for London's success. This also help to ensure that all Londoners can benefit from the capital's opportunities. Buses are the most accessible mode of transport and are therefore essential for people with a disability as well as older people who depend on them. They are also generally a more affordable option compared to rail services, and are often the only means of travel for shift workers such as those working in the night time economy. While we note the Mayor's intention to reduce bus services in Central London in order to improve provision in outer lying areas, we urge the Mayor to ensure that bus provision in Central London remains at levels that support and improve accessibility, particularly among more vulnerable and disadvantaged groups.

Criterion D should also refer to the comprehensive development of Euston Station as a co-ordinated world class sustainable transport interchange in the list of priority transport development decisions.

Table 10.3

In the Indicative List of Transport Schemes, the item on HS2 should be amended to read 'HS2 and associated National Rail changes, including ensuring sustainable construction and mitigation of impacts at street level'.

The timescale for HS2 is currently 2017-2033, rather than the 2020-2041 given in the table.

Para 10.3.4

This paragraph should state that Crossrail 2 needs to be completed prior to the opening of HS2 Phase 2 in 2033 to ensure Euston Station has sufficient capacity for passenger interchange.

Policy T5 Cycling

Table 10.2 requires a new higher level of cycle parking which is welcomed. Infrastructure that facilitates cycling is a key factor in encouraging active travel. However, the Plan also differentiates between different parts of London in the required level of parking, based on the fact that around 3.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle in inner London compared to around 1.5 per cent elsewhere in London. This suggests that the differentiated standard responds to existing demand, rather than future growth, both from increased population and cycle potential from modal shift. The draft Mayor's Transport Strategy (MTS) notes that cycling has huge untapped potential to replace many of the shorter car trips made in outer London. TfL's Strategic Cycle Analysis also notes that there are 8 million cycleable trips a day, 58% of which are made by car, many of which are in Outer London where both car ownership and use is much higher than inner London. Both the Analysis and the MTS also map key corridors and opportunities to improve the cycle network, where they predict a growth in cycling demand, including many areas in Outer London. We would therefore recommend a higher level of cycle parking in outer London to support and encourage this demand, consistent with the Mayor's Transport Strategy.

At the same, we request clarification on how the actual levels of cycle parking per square metre have been calculated as this would help boroughs to provide a robust justification to developers.

Paragraph 10.5.5

The Plan does not include the required quantity of adaptive cycle parking spaces. TfL generally requests 5% of the total number of cycle parking spaces be made for the use of

non-standard cycles, although Camden asks for up to 10%. Including a figure in the Plan (ideally 10%) will help boroughs defend a request to developers to provide cycle parking space and facilities for disabled cyclists. We also request that TfL provide more detail on the type of infrastructure required.

Policy T6 Car parking; Policy T6.1 Residential parking; Policy T6.2 Office parking; Policy T6.3 Retail parking; Policy T6.4 Hotel and leisure uses parking; Policy T6.5 Non-residential disabled persons parking

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion. Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure

accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

Policy T7 Freight and servicing

The Council supports the requirement to reduce mileage and emissions from servicing and deliveries, including retiming away from the peaks, moving from road to rail and water, and consolidation, with last mile by bike and electric vehicles

The principle of car parking design and management plans is supported. However, it is suggested that such plans should also cover cycle parking where appropriate. It is unclear if guidance on the preparation of such plans is available or intended (e.g. in a Supplementary Planning Guidance document or on Transport for London's website).

Paragraph 10.7.4

This should make reference to securing Construction Logistics Plans through the planning process, which will enable planning authorities to enforce in the event of non-compliance.

Paragraph 10.7.6

This refers to requiring CLOCS compliance which Camden, as a pilot borough for CLOCS, welcomes. However, the scope of CLOCS extends beyond the stated direct vision vehicles. The aim of CLOCS is to drive general improvements to off-site construction vehicle controls and their impacts on road safety for vulnerable road users as well as amenity. It therefore includes a wide range of safety standards, including compliance with FORS for the drivers, and agreement to routings and timings.

Policy T9 Funding transport infrastructure through planning

Camden supports the principle of an Mayoral CIL 2 as part of a package of measures to fund Crossrail 2, a project which has the potential to bring much economic benefit to Camden and London as a whole. However, it is not clear whether the need to fund other necessary public transport improvements (such as station improvements in Kentish Town and West Hampstead) have been factored into infrastructure budgeting and the setting of MCIL 2.

These wider public transport improvements may need to be funded through planning obligations and an increased MCIL2 may interfere with this unless funding is found for these improvements from other sources. Reduced transport funding to service these areas could limit their growth potential and the provision of housing and affordable housing.

Criterion A of Policy T9 states that Mayoral CIL could potentially be used to fund "other strategic transport infrastructure" as well as or instead of Crossrail 2. Camden would want to be consulted on the use of any MCIL generated in the borough which is not intended to be used on Crossrail 2 and would be concerned if any MCIL raised in the borough were to be spent on infrastructure that was not of benefit to Camden.

Chapter 11 Funding the London Plan

Policy DF1 - Delivery of the Plan and Planning Obligations

Criterion A - It should be made more explicit that applicants should take account of borough plans as well as the London Plan to ensure a balanced approach to infrastructure funding.

Criterion D - While Camden agrees that housing and transport are important priorities, a balanced approach needs to be taken to ensure that the whole range of infrastructure and other investment needs generated by growth and development can be met. In some cases the circumstances of an individual borough or development scheme may mean that other priorities (such as education provision) could take equal precedence. The need for a balanced approach to allow the full range of needs to be met should therefore be recognised in the final version of the Plan.

Criterion D refers to 'large sites' - what is meant by this needs to be defined.

Criterion E - As indicated above, while transport and affordable housing are recognised as important priorities, in setting their Regulation 123 lists for CIL, boroughs will need to take a balanced approach in order to ensure that the full range of infrastructure needs can be met. Investment priorities need to take into account current and future investment needs and available funding.

The wording of criterion E aligns poorly with the approach to economic viability set out in the government's guidance on setting CIL rates in that it places too much emphasis on the viability of development on key sites rather than looking at viability across the whole area.

The current wording may undermine the ability of boroughs to argue that, whilst a development on particular site may be unviable with a proposed set of CIL rates, development across the borough may still be viable and therefore the levels of CIL needed to fund necessary infrastructure can be charged. This could ultimately lead to a reduction in the amount of CIL that can be collected and infrastructure funded.

The wording should be amended to reflect closely CIL guidance which says: "*The authority will need to be able to show why they consider that the proposed levy rate or rates set a balance between the need to fund infrastructure and the potential implications for the economic viability of development across their area*".

Paragraph 11.1.1

This helpfully refers to the viability testing of both the London Plan and borough local plan documents. Camden Council is keen to ensure that borough level infrastructure investment needs including those funded through CIL have been taken into account and therefore request that the London Plan is amended to explicitly refer to Local Plans and CIL as well as the London Plan as follows:

"The policies in the London Plan have been subject to a viability assessment which has tested the cumulative impact of relevant standards, obligations and requirements to ensure they do not put implementation of the Development Plan at serious risk. Mayoral and borough level CIL charges and Local Development Plan Documents are also subject to viability testing. Therefore, applicants should take account of all relevant Development Plan policies (including those in the London Plan and Local Development Plan documents) as well as any relevant Mayoral and local CIL charging schedules when forming their proposals and when acquiring land".

Paras. 11.1.34-11.1.35

Levels of Mayoral CIL need to be set at a level which will allow boroughs to still be able to have the capacity to fund school provision from this source.

Paras. 11.1.55-11.1.57

A robust approach needs to be taken to economical viability to ensure that contributions to affordable housing and transport through section 106 and Mayoral CIL do not remove the ability of boroughs to fund these items through planning obligations. The Mayoral CIL needs to be set at a level which will leave a sufficient viability buffer to allow these items to be funded.

Paras. 11.1.58-11.1.62

Camden welcomes any approaches that can secure additional funding for infrastructure.

Paras. 11.1.66-11.1.67

Attempts to find new fiscal tools to support the provision of infrastructure are welcomed.

Chapter 12 Monitoring**Policy M1 Monitoring**

The Mayor should to commit to monitor waste management in London so it is known if the Plan's targets are being met.

Annexes**Annex 3 Glossary**

The Glossary should contain a definition of the term 'Circular Economy'.