

## **Draft New London Plan Examination in Public**

### **Statement of LB Camden**

**M58. Would policies SD4 and SD5 be effective in ensuring an appropriate mix of housing, offices and other development in different parts of, and outside, the CAZ to support:**

- a) the “strategic functions” of the CAZ (paragraph 2.4.4);**
- b) “locally orientated uses” in the CAZ (paragraph 2.4.5) and Policy GG1 “building strong and inclusive communities”;**
- c) Policy GG4 “delivering the homes Londoners need”; and**
- d) Policy GG5 “growing a good economy”?**

Camden Council's formal response to the draft London Plan indicates that the Council welcomes the support for residential communities and for CAZ strategic functions in Policies SD4 and SD5. The Council also supports the boundary of the Euston Opportunity Area in the new London Plan, which revises the boundary shown in the London Plan 2011 with amendments to 2016. However, the Council considers that Policy SD5 gives too much weight to the development of offices at the expense of development that supports other CAZ strategic functions and residential communities.

The minor suggested changes published in August 2018 do not address all of our concerns in relation to Policies SD4 and SD5 and supporting text. Consequently, the Council asks the Panel to consider its original representations on Policies SD4 and SD5 in the context of Matter 58.

This statement addresses the Panel's sub-questions (a) and (d) in the first section, and (b) and (c) in the second question, then proposes changes in relation to all aspects of the mix of uses in the CAZ.

**Would policies SD4 and SD5 be effective... to support:**

- (a) the “strategic functions” of the CAZ (paragraph 2.4.4); and...**
- (d) Policy GG5 “growing a good economy”.**

As currently worded, we do not consider that Policy SD5 will be effective in supporting the some of the strategic functions of the CAZ (such as the specialist cluster of academic uses at UCL/ University of London and the specialist cluster of health uses at University College Hospital) or achieving the objectives of Policy GG5.

We welcome the minor suggested change published in August 2018 which corrects Figure 2.16 by replacing the reference to the King's Cross – St Pancreas (sic) Opportunity Area with a reference to the King's Cross Opportunity Area.

We note the minor suggested change published in August 2018 which adds paragraph 2.4.4A in association with Policy SD4. We do not consider that the suggested paragraph should be added for two reasons:

1. the proposed paragraph 2.4.4A is not consistent with paragraph 2.5.6, which suggests a wider scope for development plan policies – "Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate"; and
2. proposed paragraph 2.4.4A would support Policy SD4, but it is Policy SD5 rather than Policy SD4 which deals with the weight to be given to different CAZ functions and residential development.

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, which collectively form part of the Knowledge Quarter, a hub of over 90 academic, cultural, research, scientific and media organisations located in a small area around King's Cross, the Euston Road and Bloomsbury.

These clusters make a major contribution to Camden's economy and employment. Across the Borough, data from the Business Register and Employment Survey for 2012 indicates that 12% of jobs were in the health sector, 10% of jobs in education, and 19% in other professional, scientific and technical sectors. Six publicly funded higher education institutions are based in Bloomsbury (out of 40 in London). Across London, Universities UK (the body that represents the higher education sector) estimates that for 2011-12, Universities generated a direct revenue of £5.8 billion, and combined with knock-on effects and student expenditure, generated 2.8% of London's gross value added.

As currently constructed, Policy SD5 clause (C) 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. They are subsumed in the phrase "Offices and other CAZ strategic functions are to be given greater weight relative to new residential development".

The Council does not consider that this overarching weight given to offices across the CAZ is appropriate. In Camden's part of the CAZ, 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. UCL has already established a site at the Queen Elizabeth Olympic Park in East London, and there is a real possibility that some of Camden's higher education institutions could leave the borough if further constraints are placed on expansion in the CAZ.

We acknowledge that paragraph 2.5.6 of the draft London Plan indicates that boroughs will be able set their own priorities for particular CAZ strategic functions. However, Camden Council adopted a new local plan in 2017, and does not have resources to review this in the short-term. We consider that the London

Plan should be altered to reduce the emphasis on offices within the CAZ specialist clusters now, rather than leaving it to the boroughs to give additional weight to the specialisms that define the clusters a few years down the line.

**Would policies SD4 and SD5 be effective... to support:**

- b) "locally orientated uses" in the CAZ (paragraph 2.4.5) and Policy GG1 "building strong and inclusive communities";**
- c) Policy GG4 "delivering the homes Londoners need"...**

As currently worded, we do not consider that Policy SD5 will be effective in supporting the locally oriented uses in the CAZ or achieving the objectives of Policy GG5. More specifically, we do not consider that Policy SD5 will provide for development to meet the needs of the longstanding residential communities in Central London or respect their quality of life.

As our formal response to the draft London Plan indicated, the three Camden's wards falling entirely within the CAZ provide 16.2% of the Borough's usual residents, 14.5% of its household residents and 14.4% of the Borough's residents in employment, within an area less than 4% of the Borough's total (2011 Census). These residential communities represent an enduring and important part of the character of Central London and a significant part of its workforce.

Many of these 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. For the most part, these communities do not occupy "wholly residential streets or predominantly residential neighbourhoods" that can be artificially separated from other areas in the way envisaged by sub-clause (3) of Policy SD5.

Figure 1 shows residential addresses across the southern part of LB Camden as red spots. The green line shows the Borough boundary, and the blue line shows the northern boundary of the CAZ. Though there are clearly some concentrations of residential addresses, there is a scatter between covering almost all parts of the CAZ within LB Camden except for the open spaces (Russell Square, Coram's Fields and Lincoln's Inn Fields), the railway stations, the British Library and the British Museum.

Figure 2 adds non-residential addresses as black spots. This illustrates clearly that almost all residential addresses in Camden's part of the CAZ are in mixed-use areas, and not in "wholly residential streets or predominantly residential neighbourhoods".

Figure 1. Address points in LB Camden's part of the CAZ: residential only (red)

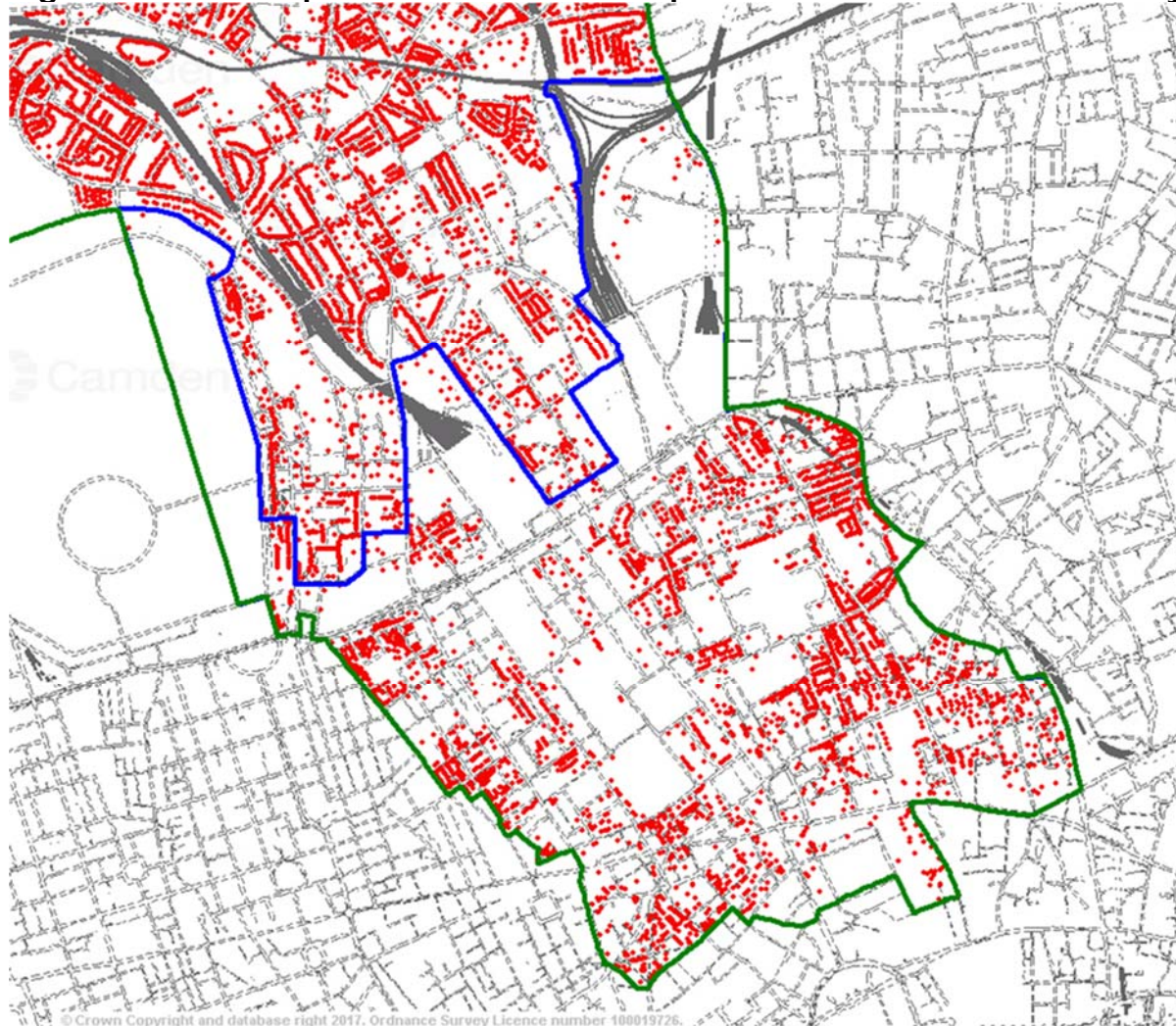
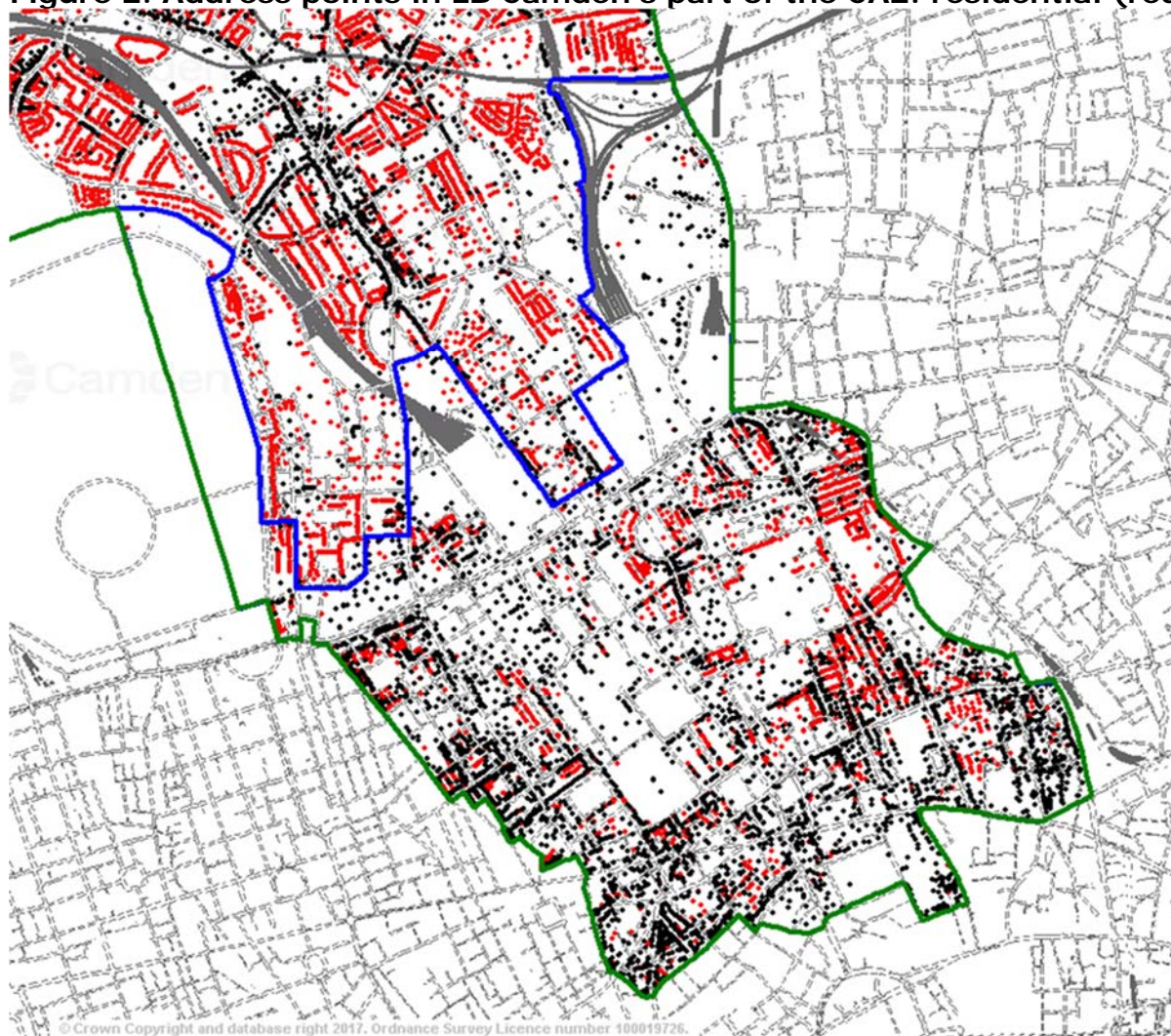




Figure 2. Address points in LB Camden's part of the CAZ: residential (red) and non-residential (black)



New and expanding communities are emerging at the Opportunity Areas of 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). The balance between homes and jobs in the Opportunity Areas is established in Table 2.1 of the London Plan minor suggested changes published in August 2018 (with further changes tabled at the Examination in Public on 23 January 2019). Given that the homes/ jobs balance for the Opportunity Areas is already established, requiring greater weight to be given to offices and CAZ strategic functions in the CAZ Opportunity Areas through Policy SD5 risks creating uncertainty over whether the homes will be delivered.

Our formal response to Policy SD5 set out in some detail how LB Camden has been using a mixed-use policy for over 10 years to seek half of additional floorspace in the CAZ as housing – giving equal weight to new residential development and new development for CAZ strategic functions (including offices). Camden's mixed-use policy has delivered, and continues to deliver, a significant proportion of the new homes within the CAZ and across the Borough. Looking at Camden's housing trajectory up to 2031, of around 7,500 homes anticipated from allocated sites, some 4,800 homes are expected to be delivered at King's Cross and Euston, and over 700 are expected to be delivered on other allocated sites in the CAZ.

Policy SD5's prescriptive requirement to give greater weight to office development than residential development right across the CAZ would prevent the continued operation of Camden's mixed-use policy, dramatically reduce the ability of Camden's Central London communities to sustain themselves (through reduction in housing supply and upwards pressure on rents and sales values), and harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by London Plan Table 4.1.

We acknowledge that sub-clause (3) of Policy SD5 and paragraph 2.5.6 of the draft London Plan indicates that boroughs will be able set their own policies identifying mixed use areas and other locations where residential development is appropriate. However, the distribution of residential addresses in Camden's part of the CAZ would not allow us to protect the interests of many Central London residents by identifying "wholly residential streets or predominantly residential neighbourhoods".

Furthermore, Camden Council adopted a new local plan in 2017, and does not have resources to review this in the short-term. We consider that the London Plan should be altered to reduce the overarching emphasis on offices throughout the CAZ now, rather than leaving it to the boroughs to seek to restore a balance with the needs of residential communities a few years down the line.

To ensure that Policy SD5 gives appropriate weight to residential communities and non-office CAZ strategic functions, and supports the objectives of Policies GG4 and GG5, we propose the following change to Policy SD5 clause (C).

***Proposed changes to Policy SD5 (C)***  
***(based on the minor suggested changes August 2018)***

- C Offices and/ or other CAZ strategic functions **(as appropriate to the particular area or specialist cluster)** are to be given greater or equal weight relative to new residential development in all other areas of the CAZ except:
- 1) the ~~Vauxhall, Nine Elms, Battersea and the Elephant & Castle~~ Opportunity Areas, where **indicative guidelines for new homes and jobs are set out in Table 2.1 and Figure 2.11** ~~offices and other CAZ strategic functions are given equal weight relative to new residential~~; and
  - 3) ~~wholly residential streets or predominantly residential and~~ neighbourhoods **with a high concentration of residential properties, where residential development may be given equal weight to development for CAZ strategic functions** (with ~~exceptions~~ **greater weight given to CAZ strategic functions** in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters).