Camden

Proposed Submission Draft

VELCOME TO

April 2025





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Camden Local Plan

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April 2025



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Introduction

1.1 The new Camden Local Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this. 1.2 It identifies how many new homes and how much employment floorspace is needed to support Camden's population, and where and how this should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods.

17 summer

1.3 The new Camden Local Plan will ensure that Camden continues to have robust, effective and up-todate planning policies that respond to changing circumstances and the borough's unique characteristics. It will contribute to the delivery of the ambitions, missions and challenges identified in We Make Camden, the Council's corporate strategy, and other local priorities set out in plans and strategies prepared by the Council and other bodies.

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1.4 The Local Plan will cover the period from 2026 - 2041. Once adopted it will replace the current Camden Local Plan (2017), the site allocations in the Fitzrovia Area Action Plan (2014) and relevant site allocation policies in the Camden Site Allocations Plan (2013). A policy replacement schedule is set out in Appendix 1.

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Camden's development plan

1.5 The Local Plan is a key document in Camden's development plan, the name given to the group of documents that set out the Council's planning policies. The Council's decisions on planning applications must be in line with the development plan unless there are significant matters (material considerations) that indicate otherwise.

1.6 Councils must have regard to the National Planning Policy Framework (NPPF) when drawing up their plans and it is a material consideration in decision making on planning applications. The NPPF is supported by more detailed National Planning Practice Guidance.

1.7 The NPPF includes a 'presumption in favour of sustainable development'. It states that for plan making the presumption means that local authorities should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Plans should be based upon, and reflect, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The new Local Plan has been prepared in accordance with the NPPF.

Figure 01: Camden Planning Document Hierarchy



Figure 02: Camden in context





Other documents in Camden's development plan

1.8 London Plan - The London Plan is the Mayor's planning strategy for Greater London. It sets borough level housing targets and identifies locations for future growth of London-wide importance. The London Plan forms part of all London boroughs' development plans and Camden's new Local Plan (and other development plan documents) needs to be in general conformity with it.

1.9 Camden Site Allocations – this identifies known development sites in Camden's main growth areas, and other locations across the borough, that are suitable for substantial development and sets out the Council's expectations for them. The Camden Site Allocations Plan was adopted by the Council in 2013 and will be replaced by the new Local Plan and the updated Euston Area Plan once they are adopted. A policy replacement schedule is set out in Appendix 1.

1.10 Fitzrovia Area Action Plan – was adopted by the Council in 2014 responding to the significant pressure for development in this area and co-ordinates development proposals across a number of significant sites. When it is adopted the new Local Plan will replace the policies and guidance relating to specific opportunity sites within the Fitzrovia Area Action Plan. A policy replacement schedule is set out in Appendix 1.









1.11 Euston Area Plan – this is a strategic plan to help shape future change in the area around Euston Station. It seeks to ensure that we can secure the best possible future for the residents and businesses of Euston and visitors to the area. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in 2015. The Council are updating the Euston Area Plan (EAP) to ensure it has an up-to-date policy framework to guide decisions at Euston. The new EAP sets strategic objectives and guidelines for development in the area, in addition to allocating sites for development to deliver new homes and jobs.

1.12 Neighbourhood Plans – neighbourhood plans have been made for Fortune Green and West Hampstead (2015); Kentish Town (2016); Highgate (2017); Hampstead (2018); Dartmouth Park (2020); Camley Street (2021); and Redington Frognal (2021). These plans set out the communities' visions for the designated neighbourhood areas, and include a range of planning policies, which are used alongside the Council's own adopted policies when making planning decisions in the neighbourhood areas.

1.13 North London Waste Plan – this sets out the planning framework for waste management in the seven north London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. It was adopted by each of the boroughs in 2022 and identifies a range of suitable sites for the management of all North London's waste up to 2031 and includes policies and guidance for determining planning applications for waste developments.

Neighbourhood plans

1.14 Communities can influence the future of their local areas by preparing a neighbourhood plan that sets out their vision for the area and general planning policies to guide development. Neighbourhood plans are led and written by the community, not the Council. They have to be in line with the overall strategic approach in Camden's adopted plans and with national policy.

1.15 A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. Once approved by referendum, a neighbourhood plan becomes part of the development plan for the borough and is taken into account alongside the Council's other plans when making decisions on planning applications in that area.

1.16 Further information about neighbourhood planning in Camden and adopted neighbourhood plans is available on the Council's website: <u>Neighbourhood planning - Camden Council</u>.





Supplementary planning documents

1.17 The Council has prepared a number of other documents that provide advice and guidance on how our planning policies will be applied for certain topics, areas or sites, known as Supplementary Planning Documents (SPD). These include:

- Camden Planning Guidance a series of documents that expand on the policies in the Local Plan to provide further guidance on how we will apply our planning policies. These can be viewed on the <u>Council's</u> <u>website</u>.
- Planning Frameworks a series of briefs and frameworks to help support and guide the redevelopment of specific sites and areas in Camden. These can be viewed on the <u>Council's website</u>.

1.18 These documents do not have the same weight in decision making as Camden's development plan documents, but they are important supporting documents and material considerations in planning decisions.

Other planning guidance

Cernden Planning Guidanou Access for all Merei 2013

1.19 The Council has also prepared a series of conservation area appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas, in addition to setting out how we consider they can be preserved or enhanced. These are material considerations in the determination of planning applications for development in conservation areas.



Local Plan policies map

1.20 The Local Plan Policies Map shows where the policies in the Local Plan apply geographically, including key sites for development. The policies map has been updated to reflect the policies in the new Local Plan.



Preparation of the new Local Plan

1.21 The decision was taken in 2022 to review the Camden Local Plan 2017, to ensure the Council continues to have a robust and up-to-date policy position which reflects local priorities.

1.22 To inform the review of the Local Plan the Council held an initial 'call for views' in late 2022 / early 2023 to enable residents, community groups, businesses and other interested parties to share their views on the current Local Plan and priorities for the future.

1.23 Prior to this, the Council had consulted on a draft Site Allocations Local Plan in 2020 and late 2021 / early 2022. However, the decision was subsequently made to incorporate the proposed site allocations into the draft new Local Plan.

1.24 The draft new Camden Local Plan was published for consultation and engagement from the 17 January 2024 to the 13 March 2024.

1.25 Consultation and engagement on the new Local Plan has been undertaken in accordance with the Council's Statement of Community Involvement. The comments received during each stage of consultation and engagement have been considered in preparing and updating the new Local Plan. A summary of the key issues raised through the consultation and the Council's response to them are set out in the <u>Consultation Statement</u>.

1.26 The proposed submission version of the Local Plan is now published for consultation and engagement.

1.27 Following the close of the consultation, the Plan, along with the consultation responses received and supporting evidence, will be submitted to the government for public examination by a Planning Inspector. If the Plan is found sound it will be adopted by the Council for use in planning decisions, superseding the Camden Local Plan 2017 and relevant site allocation policies in the Camden Site Allocations 2013 and Fitzrovia Area Action Plan 2014. A policy replacement schedule is set out in Appendix 1.

Duty to co-operate

1.28 Plans have to be prepared in accordance with the legal 'duty to co-operate'. The duty to co-operate requires local authorities and other public bodies to engage constructively, actively and on an ongoing basis on strategic matters that cross administrative boundaries. The Council has engaged with neighbouring boroughs, and other relevant organisations, in the preparation of the new Local Plan, and will continue to work with them on an on-going basis.

Sustainability appraisal and impact assessment

1.29 The new Local Plan has been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment), a Health Impact Assessment and an Equalities Impact Assessment.

1.30 The Sustainability Appraisal assessed the environmental, social and economic impacts of the new Local Plan, including an appraisal of alternative approaches for addressing a range of key Plan issues.

1.31 The Health Impact Assessment assessed the potential health impacts of the Plan and made recommendations to maximise the positive impacts and minimise the negative impacts, to ensure the policy approach in the Plan contributes to improving health outcomes and reducing health inequalities for Camden's communities.

1.32 The Equalities Impact Assessment considered the impact of the Plan on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It also considered the impact of the Plan on:

- foster carers;
- looked after children/care experienced people;
- low income households;
- refugees and asylum seekers;
- parents (of any gender, with children aged under 18);
- people who are homeless;
- private rental tenants in deprived areas;
- single parent households;
- social housing tenants; and
- gypsies and travellers.

1.33 The Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment are published on the <u>Council's website</u>.

Evidence to support the Local Plan

1.34 The policies in the Local Plan need to reflect up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the borough and must meet identified needs in accordance with the National Planning Policy Framework (NPPF). The Council has collected a wide range of information and commissioned studies to support and inform the new Plan, including studies on housing need, employment land, retail floorspace, flood risk, and biodiversity. A viability assessment of the policies in the new Plan has also been undertaken. This evidence can be viewed on the <u>Council's website</u>.



Site allocations

1.35 The new Local Plan includes a number of site allocation policies. The policies set out the Council's preferred approach to the development of the allocated sites to ensure that they deliver the objectives of this Local Plan and meet the needs of the local community.

1.36 Each site allocation policy responds to local and site specific issues and opportunities. However, all the site allocation policies are structured in the same way, setting out: site details; allocated use; indicative capacity; context; development and design principles; infrastructure requirements; and other considerations.

1.37 Sites have been identified and allocated taking into account national policy and guidance, the London Plan and the policies in the Local Plan. No sites in the Euston area are allocated in this Plan as they will be identified through the update to the Euston Area Plan.

1.38 Indicative housing capacities are identified for allocated sites. It is important to note that these are indicative and therefore are not fixed figures that must be adhered to exactly. Indicative housing capacities have been identified based on adopted area frameworks, neighbourhood plan policies, existing planning permissions and design-led site capacity work.

1.39 Where schemes come forward that propose substantial or full demolition of existing buildings on these sites, applicants will need to comply with the requirements set out in Policy CC2 (Retention of Existing Buildings). If it can be demonstrated to the Council's satisfaction that an existing building cannot be retained and improved upon, and demolition is permitted, then the development capacity of the site will be agreed as part of the planning application process, in accordance with the development plan.

1.40 A larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours. A lower number may be supported where this can be justified, having regard to the overall supply of housing in the borough compared with housing needs and demonstrable needs for other land uses.

Strategic and non-strategic policies

1.41 The National Planning Policy Framework (NPPF) states that Local Plans should include strategic and non-strategic policies, and that these should be clearly distinguished.

1.42 Strategic policies should set out an overall strategy for the pattern, scale and quality of development including housing and employment uses. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development.

1.43 All the policies in the Local Plan are considered to be strategic policies, with the exception of the following, which are considered to be non-strategic policies:

- Policy IE7 Hot Food Takeaways;
- Policy IE8 Gambling Uses;
- Policy SC5 Food Growing;
- Policy D6 Basements;
- Policy D7 Advertisements and Signage;
- Policy D8 Shopfronts;
- Policy A4 Noise and Vibration.

1.44 For the avoidance of doubt, all policies in the Local Plan have full statutory development plan weight and the Local Plan should be read as a whole.



The challenges we face

^{1.45} Camden's planning strategy has been prepared in the context of the social, economic and environmental changes we face as a borough. Some of the key challenges and issues we need to address in our planning policies are outlined below.





Adapting to Camden's changing population

1.46 Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. Camden's population is also ethnically diverse, with the 2021 Census showing that 40.5% of Camden's residents were from Black, Asian or other ethnic communities. Furthermore, the 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This is the second highest proportion amongst London boroughs and is higher than the London average (13.2%). A key challenge for the Plan is to therefore ensure that development celebrates and reflects the diversity of Camden's communities and supports the provision of accessible services and facilities to meet their needs.

The supply and cost of housing in the borough

1.47 Many people want to live in Camden but there is a limited supply of homes and prices are high. This is primarily due to the limited availability of land in Camden and competition from other uses, which have high returns on investment.

1.48 It is important to ensure that we help keep Camden's social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing both more homes and a more varied range of housing to meet existing and future housing needs, in particular those of young people and families, who often struggle to find suitable and affordable homes in Camden.







Responding to the climate and ecological emergency

1.49 The Council declared a climate and ecological emergency in 2019, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems. We Make Camden, the Council's corporate strategy, emphasises the need for Camden to adapt to meet the climate challenge that faces us, address the causes of the climate emergency, and work towards becoming net-zero, while ensuring that we are supporting and protecting the most vulnerable members of our communities from the impacts of climate change. This is supported by our biodiversity strategy 'Making space for nature in Camden' which sets out a vision for how we will make Camden a place where nature thrives.

1.50 A key challenge for the Plan is therefore to ensure that development in Camden seeks to mitigate and adapt to climate change and enhance biodiversity by:

- making the best use of sites in the most accessible locations;
- using less energy;
- minimising the use of resources;
- following the principles of a circular economy, where re-use and recycling are prioritised;
- delivering net gains in biodiversity;
- supporting tree planting; and
- ensuring that buildings and spaces are designed to cope with more extreme weather.

Supporting Camden's centres

1.51 Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole. They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange, by providing places where people can meet and interact.

1.52 However, traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out-of-centre retail locations. Our centres are under pressure from a range of issues, for example the cost-of-living crisis and hybrid working are impacting on 'footfall' (how many people use a centre), particularly in the south of the borough. A key challenge we face is therefore supporting our high streets to diversify and adapt over time in terms of managing land uses whilst ensuring that the vitality and role of individual centres is not put at risk.





Creating a sustainable and inclusive economy

1.53 Camden has a very successful and diverse economy, which makes a significant contribution to the UK economy, as well as being a key part of central London, with its concentration of businesses, retail and tourism uses. The Council wants to maintain and strengthen Camden's economic position, maximising opportunities for residents, businesses and the voluntary sector to contribute to and share in the success of Camden's economy through local procurement, business support, education, training and skills.

1.54 Whilst there remains a strong demand for high quality offices in the south of the borough and a growing demand for laboratory and research space. At the same time, there is a need to retain a diverse range of neighbourhood workspace to support a variety of local businesses, including for makers and creative industries.

1.55 Furthermore, employment is the biggest factor affecting income inequality in the borough, so we need to ensure that we help more people to get into work and develop their careers in the long-term. This can be supported through a range of measures, including helping people to access training and establishing links with businesses.

Inequalities



1.56 The success of Camden's economy is not shared by all. The borough has some of the most deprived neighbourhoods in London as well as some of the most prosperous. Inequalities, particularly felt by our often 'easy to ignore' communities, are compounded when taking an intersectional view. Therefore, it is even more crucial that the Local Plan aids achieving equitable outcomes in Camden for all.





Health and well-being

1.57 Camden has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards. We know that health is intrinsically linked to early life experience, education, employment, housing, leisure, and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live. Planning can play a pivotal role in influencing key health determinants, addressing inequalities, and improving the physical and mental health, and well-being, of Camden's population.

Improving transport

1.58 Camden benefits from some of the best transport accessibility in the country and this will be enhanced by HS2 and potentially Crossrail 2. It is well served by bus, tube and rail, providing links within London, to other parts of the country, and to mainland Europe. We need to go further, however, to change the way we move about, to ensure that travel becomes healthier, safer, more inclusive (for example by increasing number of step-free stations), more efficient, more sustainable, and more affordable. Achieving this will help to improve air quality, personal health, equality and community cohesion, access to opportunities and services, and economic growth. In addition, it will support the Council's commitment to being a net zero borough by 2030 by reducing transport's contribution to climate change, help to tackle congestion on the transport network, and create more inclusive streets that better meet the needs of Camden's communities.





Quality of the environment

1.59 Good quality, inclusive design is essential in creating and maintaining places where people want to live and work, now and in the future. Good design is not just about making places visually attractive. It has an important role in mitigating the effects of climate change; promoting active travel; delivering high quality, accessible and adaptable accommodation that meets the needs of occupiers; and creating healthy and safe communities. The Council has developed a Diversity in the Public Realm strategy, that seeks to create a borough with places and spaces that are truly representative of the people we have within our communities, and it is important that new development helps to deliver this.

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

1.61 Planning also has an important role to play in shaping public spaces to be safe, inclusive, accessible and welcoming for everyone – designing equality, connection, play and community into our streets, estates and neighbourhoods and ensuring that public spaces and new developments reflect the shared history, culture and diversity of Camden to promote a sense of belonging.



Crime and safety

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

Vision and objectives

The Council's vision for the borough is set out in We Make Camden. The vision for the Local Plan is therefore based on the vision of We Make Camden.

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



1.65 This Local Plan is a key mechanism for delivering the priorities of We Make Camden and other Council strategies including the Climate Change Action Plan, Clean Air Action Plan, Camden Health and Well-being Strategy, Transport Strategy and Biodiversity Action Plan.



1.66 We Make Camden sets out six ambitions for the borough:





1.67 These are supported by four missions and six challenges, which aim to bring to life the Council's ambitions and help make them a reality in every community in Camden.

1.68 The key missions set out in We Make Camden for the Local Plan are:

- Young people: Every young person has access to economic opportunity that enables them to be safe and secure;
- **Food:** Everyone eats well every day with nutritious, affordable, sustainable food;
- Estates and neighbourhoods: Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity.

1.69 The key challenges set out in We Make Camden for the Local Plan are:

- **Safety:** Everyone is safe at home and safe in our communities;
- Digital: Everyone in Camden can access and be part of a digital society;
- Loneliness: No one in Camden is socially isolated without the means to connect to their community;
- **Housing:** Camden has enough decent, safe, warm, and family-friendly housing to support our communities;
- Climate emergency: Camden's local economy tackles the climate emergency.

Strategic objectives

1.70 We have developed a series of objectives for the Local Plan to help deliver the vision and ambitions of We Make Camden.

1.71 The strategic objectives of the Plan are set out below, alongside the six ambitions of We Make Camden (see above) and the relevant policies in this Local Plan, to show how they will contribute to and work together to achieve the objectives.

Table 1 | Strategic Objectives

Strategic Objectives	We Make Camden Ambition	Local Plan Policy
To ensure that development in Camden responds to the climate emergency by delivering zero carbon development, reducing energy use in existing buildings, optimising resource efficiency, achieving the highest possible environmental standards, and requiring buildings and spaces to be designed and constructed to adapt to, and reduce, the effects of climate change.	6	DS1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC10, CC11, D1, D2, D3, D4, D5, NE1, NE2
To increase the supply of homes to meet existing and future needs, with an emphasis on the provision of genuinely affordable homes. Self- contained housing is the priority use of the Local Plan.	1, 5	DS1, H1, H2, H4, H5, H6, H7, H8, H9, H10, H11
To make sure that development meets the needs of Camden's diverse communities and enables safe, strong, inclusive, cohesive, open, resilient and multi- generational communities, to help reduce inequality and isolation in the borough, and support the provision of accessible facilities and services to meet community needs.	1, 3, 4	DS1, H6, H8, D1, SC1, SC2, SC3, SC5, SC6, CC1, A2, T1, T2, T3, T4, IE1, IE6, DM1
To strengthen Camden's nationally important economy and maximise opportunities for Camden's residents, businesses and voluntary sector to contribute to, and share in, the success of Camden's economy, through local procurement, business support, education, training and skills.	2	DS1, IE1, IE2, IE3, IE4, IE5, IE6
To ensure our designated centres are accessible and sustainable, to enhance their unique character and support their varied roles as centres of trade, community activity, creativity, business, tourism and learning.	2	DS1, IE1, IE5, IE6, SC3, SC6, D1, D7, D8, T1, T2, T3, T4
To promote high quality, inclusive and sustainably designed development which protects resident's amenity, respects and conserves the unique character and history of Camden's neighbourhoods, celebrates and reflects the diversity of Camden's communities, and enables families to remain in the borough and thrive.	1, 3, 4, 6	DS1, CC1, D1, D2, D3, D4, D5, A1, A2, H1, H6
To promote active and sustainable transport, where walking, wheeling and cycling are the safest and most convenient options; invest in public transport; and reduce reliance on private cars, to reduce air pollution and improve health and well-being.	3, 4, 6	DS1, T1, T2, T3, T4, T5, A3, CC1, SC1, D1
To improve access to parks and green spaces and enhance biodiversity, by protecting and enhancing existing assets and providing new green spaces and habitats.	6	NE1, NE2, NE3, SC4, SC5, DS1, D1
To promote health and well-being and reduce physical and mental health inequalities through good design and place making; improving access to nature; enabling affordable healthy food choices; supporting people to lead healthy and active lifestyles; and improving access to healthcare and sports facilities.	4, 6	SC1, DS1, H6, H8, D1, D2, D3, SC2, SC3, SC4, SC5, SC6, NE1, NE2, T1, T2, T3, T4, A1, A2, A3, A4