

Shaping Camden

Camden's Local Development Framework

Preferred Development Policies



Have your say

Consultation October – November 2008

We want to hear your views on our preferred options in this document. The consultation will allow you to influence the direction of the Development Policies before we move onto the next stage.

Please reference the option or topic you are commenting on.

You can send you comments to:

Forward Planning

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Or you can email your comments to:

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Or you can comment via our website:

www.camden.gov.uk/ldf

Please send your comments by 20 November 2008

(Please note that all comments received will be available for public inspection)

Shaping Camden

Camden's Preferred Development Policies

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Introduction

1. We are currently preparing the next generation of Camden's planning policies. All councils have to produce a group of documents setting out their planning strategy and policies called a Local Development Framework (LDF). Our Local Development Framework will eventually replace the Camden Unitary Development Plan (UDP) which was adopted in June 2006 and sets out our current planning policies.

Role of Camden Development Policies

2. **Camden Development Policies** will support and help to implement the **Core Strategy** – our lead LDF document which sets out our overall planning vision and strategy for the borough – by setting out detailed planning policies that the Council will use when determining applications for planning permission in the borough. It will be a key tool in achieving the objectives of the Core Strategy and the vision in Camden's Community Strategy.
3. Our Development Policies stem from the Core Strategy and must be consistent with it. Development Policies should also be consistent with national and London-wide policies (unless there is strong evidence that a different approach is more appropriate in Camden). They should not duplicate them, rather they should set out our local approach to the matters covered responding to Camden's unique circumstances.
4. Late last year we asked for views on the key issues and challenges that will face the development of Camden over the next twenty years and options dealing with them. Following this we considered the responses we received along with the background evidence and information we have collected, the sustainability appraisal we carried out (see below) and national and regional policy. Using these, we developed our preferred Development Policies, which are set out in this document.
5. The relationship between our preferred options for Camden's Core Strategy and our preferred Development Policies are set out in Table 1.

Other Local Development Framework documents

6. In addition to Development Policies, Camden's Local Development Framework will contain a number of other documents. These are:
 - **Core Strategy** – this will set out the key elements of the Council's planning vision and strategy for the borough. Our Development Policies and all of our other planning documents must be consistent with it. Consultation on our preferred approach for Camden's Core Strategy is taking place alongside consultation on this Development Policies preferred approach document.
 - **Site Allocations** – which will set out the Council's proposals for places that are expected to experience major development.
 - **North London Waste Plan** – this will set out policies relating to waste and identify sites for major recycling and other waste handling facilities in North London. It will be prepared jointly by Camden and the six other boroughs in the North London Waste Authority area.
 - **Supplementary Planning Documents (SPD)** – these documents will provide additional guidance on how the Council's planning strategy and policies will be implemented for specific topics, areas or sites. Although they will not form part of the statutory development plan for Camden, and will therefore not have the same weight in decision making, they will be important considerations in the Council's planning decisions. We will review our main Camden Planning Guidance supplementary planning document to ensure its consistency with the adopted Core Strategy, Development Policies and other relevant LDF documents.
7. A list of the planning policy documents that Camden will be preparing over the next few years and the timetables for their production are set out in Camden's Local Development Scheme.

Camden's Community Strategy and other strategies

8. Our Local Development Framework documents need to take into account other plans and strategies that influence the use of Camden's land and places. They will seek to contribute to achieving the vision in **Camden Together – Camden's Community Strategy 2007 – 2012** and other relevant strategies. The Community Strategy sets out the shared vision and strategy for the borough of the Camden and its partners.
9. Camden has many other strategies that cover the broad range of the Council's work. Strategies relevant to the Local Development Framework include Camden's Housing Strategy, the Safer Camden Strategy, our Air Quality Strategy, Camden's Children and Young People's Plan and our Local Implementation Plan (LIP), which sets out Camden's transport objectives, schemes and programmes.

Monitoring

10. The Council will monitor the effectiveness of our Development Policies in delivering its objectives by assessing its performance against a series of indicators. These are set out in a separate Local Development Framework Monitoring Indicators document. A number of indicators will be included for each policy. These will include core indicators, set by the government, and local Camden-specific indicators. Each year we will publish an Annual Monitoring Report. This will:
 - assess the performance of our LDF documents;
 - identify the need to reassess or review any policies or approaches;
 - make sure the context and assumptions behind our approach are still relevant; and
 - identify trends in the wider social, economic and environmental issues facing Camden.

Our Preferred Approach

11. The main body of this document sets out the Council's preferred approach to our detailed planning policies. These have been developed taking into account a number of sources, including:
 - the responses to consultation on key issues and options;
 - evidence we have collected and commissioned;
 - the policies and plans of the government and the Mayor of London (our approach must be in line with these unless we have strong evidence that a different approach is more appropriate in Camden);
 - Camden's Community Strategy and other Council plans and strategies;
 - other relevant plans and policies.
12. When our Development Policies are finalised (see What happens next below), we will use them, alongside the approach and policies in our Core Strategy, when we assess planning applications. They therefore will be a key tool to achieving the objectives of the Core Strategy and the vision in Camden's Community Strategy. Please refer to the relevant part of the Core Strategy for further information on the Council's overall strategy for the matters covered in this document.
13. As in the Core Strategy, we have grouped the topics covered in this Development Policies document into six themes, as set out below. Please see the Core Strategy for information on how these relate to the vision and themes in Camden's Community Strategy.

- 1 **Managing Camden's growth**
- 2 **Providing housing and affordable housing**
- 3 **Promoting a sustainable Camden and tackling climate change**
- 4 **Improving Camden's environment**
- 5 **Improving the quality of life of Camden's communities**
- 6 **Securing a strong economy that includes everybody**

14. For each issue within these themes this paper sets out: our preferred policy and how we will implement it, any alternative options considered and the reasons they have not been chosen, plus key references and evidence. A summary of the comments received during consultation on issues and options is included for each theme.

Sustainability Appraisal

15. We need to carry out a sustainability appraisal of the Core Strategy, Development Policies and other Local Development Framework documents. This promotes sustainable strategies and policies through an assessment of their environmental, social and economic impacts. It helps us to identify and minimise any potential harmful impacts of our strategy and policies and to maximise the beneficial impacts.
16. As the first stage of the sustainability appraisal of Camden Development Policies we prepared a Scoping Report, which looked at the baseline information and relevant plans, policies and programmes. This was sent to statutory consultees for comment in line with the regulations. Following this we have carried out a full appraisal of the options considered in the Development Policies Issues and Options paper and any other options raised during consultation, and this has informed the development of the Council's preferred options.

What happens next?

17. The process for preparing our Development Policies document, which includes three rounds of public consultation, is set out below –
- gathering background information and consulting on key **issues and options** for the future of Camden;
 - developing the Council's **preferred policies** and consulting on them, alongside the sustainability appraisal. This is the current stage;
 - preparing the Development Policies document for submission to the government and further consultation (**'submission'**);
 - a public **examination** where the document is assessed by an independent inspector;
 - publication of the **Inspector's report**;
 - **adoption** of Camden Development Policies by the Council.
18. When the Council adopts the Development Policies it will, along with other Local Development Framework documents including the Core Strategy, replace the Council's current Unitary Development Plan. These will then, with the Mayor's London Plan, form the basis for planning decisions in Camden.

Core Strategy Preferred Approach		Supporting Development Policy	
Managing Camden’s growth			
CS2.	Making the best use of our limited land	DP1.	Mixed use development
Providing housing and affordable housing			
CS4.	Providing quality homes	DP2.	Additional housing
		DP3.	Addressing the needs of specific groups
		DP4.	Affordable and market housing proportions
		DP5.	Housing size mix
		DP6.	Preventing the loss of housing and affordable housing
		DP7.	Housing with shared facilities or support facilities
		DP8.	Groups using housing with shared facilities or support facilities
		DP9.	Gypsies and travellers
Promoting a Sustainable Camden and tackling climate change			
CS5.	Tackling climate change through promoting higher environmental standards	DP10.	Sustainable design and construction
		DP11.	Tackling climate change
		DP12.	Water
CS6.	Dealing with our waste and encouraging recycling	See the North London Waste Plan	
CS7.	Promoting efficient transport with a low environmental impact	DP13.	Development and transport assessments
		DP14.	Walking, cycling and public transport
		DP15.	Making the best use of highways and street-spaces
		DP16.	Parking and the impact of development
		DP17.	Parking standards and limiting the availability of car parking
		DP18.	Movement of goods
Improving Camden’s environment			
CS8.	Promoting high quality places	DP19.	Alterations and extensions
		DP20.	Basements
		DP21.	Archaeology
CS9.	Improving and protecting our parks and open spaces and encouraging biodiversity	DP22.	Provision of, and Improvements to, open space, sport and recreation facilities

Core Strategy Preferred Approach

Supporting Development Policy

Improving the quality of life of Camden's communities

CS10. Supporting community services and facilities

DP23. Community and leisure uses

CS14. Improving and protecting amenity

DP24. Amenity

DP25. Noise and vibration

DP26. Clear Zones

Securing a strong economy that includes everybody

CS15. Promoting a successful and inclusive Camden economy

DP27. Employment premises and sites

DP28. Local training schemes and enterprise development

DP29. Live/work premises

DP30. Tourism development and visitor accommodation

CS16. Promoting our town centres and shops

DP31. Managing the impact of food, drink, entertainment and other town centre uses

DP32. Helping and promoting local shops

DP33. Markets

DP34. Shopfronts

1 Managing Camden's growth

- 1.1 It is estimated that Camden's population will increase by around 35,000 people (about 15%) between 2006 and 2026. This growth in population will be accompanied by an increase in the number of homes, offices and other land uses in the borough. As Camden is already highly built up and has many places that are highly valued by local people, we face specific challenges in how to adapt to our growing population while improving and protecting our environment and how to get the right developments in the right places.
- 1.2 **A sustainable Camden that adapts to a growing population** is one of the key themes in Camden Together – Camden's Community Strategy. Our Local Development Framework documents are one of the main mechanisms for achieving this. The **Managing Camden's Growth** section of our Core Strategy sets out the Council's overall strategy in relation to growth, where it happens and how it is managed. Preferred Approach CS1 – **Distribution of growth** sets out our overall strategy for the location of new development in the borough. This is to promote a concentration development at King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange, with some development at other highly accessible locations (in particular Central London and the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town and Kilburn High Road) and more limited development elsewhere.
- 1.3 Preferred approach CS2 – **Making the best use of our limited land** promotes the most efficient use of land and buildings in Camden by, among other things, encouraging a mix of uses and expecting the provision of a mix of uses in schemes in the most accessible parts of the borough, including an element of housing where appropriate.
- 1.4 The **Managing Camden's Growth** section of the Core Strategy also covers the infrastructure needed to make development work and support local communities, our use of planning obligations; and our approach to Central London, with its unique character and challenges.
- 1.5 This Development Policies document provides detailed planning policies to help implement our Core Strategy. The **Managing Camden's Growth** section in the Core Strategy sets out our overall approach where growth will happen and how we can make sure it works positively for Camden. As this is predominately a strategic matter, there only one issue – mixed use -under the **Managing Growth** theme for which there is a need for a detailed development policy.

WHAT YOU TOLD US

- 1.6 The main points raised on mixed uses during consultation on Issues and options are summarised below. Consideration of mixed use issues was contained in the Core Strategy Issues and Options paper. Please see the Core Strategy Issues and Options Consultation Statement for a summary of the comments we received on mixed use development and other issues relating to managing Camden's growth and the Council's response to them.
- Mixed use development was generally supported, although some respondents commented that a mix of uses would not be appropriate in all circumstances and a number felt that any policy should be applied flexibly.
 - On-site provision of secondary uses was supported by some respondents but some private sector respondents felt that payments in lieu and off site provision should be accepted in more cases.
 - There was support for exempting some land uses/users from the need to provide mixed use, with education, health, markets and cultural uses specifically mentioned.
 - There was some support for offsetting the need to provide a mix of uses with the provision of other benefits.

- 1.7 The Development Policies Issues and Options Consultation Statement contains a summary of the comments we received on this matter and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on promoting managing Camden's growth during consultation on issues and options for the Core Strategy and the Council's response.

Mixed use development

- 1.8 Core Strategy Preferred approach CS2 – **Making the best use of our limited land** promotes the most efficient use of land and buildings in Camden. This approach includes encouraging a mix of uses in development and expecting the provision of a mix of uses in schemes in the most accessible parts of the borough. Preferred policy DP1 helps to deliver this by setting out our detailed approach to mixed use development.

Preferred Policy DP1 – Mixed use development

The Council will seek a mix of uses in suitable development, including a contribution towards the supply of housing. We will:

- expect up to 50% of additional gross floorspace to be housing where more than 200sqm additional floorspace is provided in the Central London Area (except Hatton Garden), Camden Town, Swiss Cottage/Finchley Road and Kilburn High Road;
- resist development that reduces the amount of floorspace in secondary uses unless particular circumstances make a mix of uses inappropriate.

When considering the mix of uses the Council will take account of:

- the site and surrounding area;
- the need for the existing use;
- whether the new floorspace is for the existing user;
- the need for an active street frontage and natural surveillance;
- the extent to which a development is purely publicly funded and may not seek a mix of uses in such cases.

The Council may not seek the introduction or retention of secondary uses where the sole or primary use proposed is housing.

- 1.9 If we are going to adapt successfully to Camden's growing population, we need to make the best use of the borough's limited land. Part of this is making sure there is an appropriate mix of uses in areas and buildings. Large parts of the borough have a well-established mixed-use character and the Council seeks to retain and extend this. As well as making efficient use of land, a mix of uses can reduce the need to travel between homes, jobs and services and also increase the provision of housing. It can contribute to the success and diversity of places, ensuring they have a range of activities and are used throughout the day, increasing safety and security.

- 1.10 The Council will therefore seek to secure a mix of uses in suitable developments in appropriate locations. Camden's Central London Area, Camden Town, Swiss Cottage/Finchley Road and Kilburn High Road are the parts of the borough which have the best access to public transport and offer the best potential for a mix of uses. The Council assesses mixed-use schemes in terms of the "primary" use, which is the largest land-use by gross floorspace, and "secondary" uses, which are all uses with smaller gross floorspaces. Where the primary use of a building is not housing, our priority secondary use is permanent housing (in Use Class C3). This reflects that housing is the priority use of Camden's Local Development Framework due to the scale of housing need in the borough and the need to secure land for homes. Consequently, the Council will expect development schemes in Central London and our larger town centres to provide a mix of uses, and will seek to negotiate up to half of all additional floorspace as residential use (Use Class C3). Additional housing in these locations will help provide a balance with commercial uses and to support shops, services and local facilities.
- 1.11 Residential accommodation provided in mixed-use schemes should be independent of other uses and have a separate access at street level. Affordable housing will be required in appropriate circumstances in line with Core Strategy Preferred Approach CS4 – **Providing quality homes** and Development Policy DP4 – **Providing affordable housing**.
- 1.12 The adoption of a mixed-use approach means that there will inevitably be occasions when new business development adjoins new or existing residential accommodation. By definition, business uses within Use Class B1 should be capable of operating in residential areas without having an adverse impact on residential amenity. The Council is concerned, however, that in some instances noisy plant and extended hours of operation can have a harmful effect on amenity. We will therefore use control over design and planning conditions to protect the amenity of existing and future residents in new mixed-use schemes.
- 1.13 The need for secondary uses and the precise mix and proportion appropriate will vary in different locations and will be a matter for negotiation. Considerations will include:
- the nature and variety of existing uses on the site and in the area;
 - the character, diversity and vitality of the surrounding area;
 - the impact of the balance of uses proposed;
 - any over-dominance of a single use in the area;
 - the scale of premises and blocks;
 - vacancy levels; and
 - levels of street activity at different times of the day.
- Secondary uses that may be sought include shops, community facilities, open space and workshops for light industry.
- 1.14 Where housing is the sole or primary use proposed, the Council will not seek secondary uses unless there is a shortfall of facilities in the area that will be needed for the development (for example, open space or health facilities), or the secondary uses are needed to provide an active street frontage (for example, shops in or adjacent to a shopping parade).
- 1.15 To support mixed use development, the Council will not grant planning permission for schemes that reduce the amount of floorspace in secondary uses, unless we consider that particular characteristics of the proposal, site or area would make development of housing or a mix of uses inappropriate.

OFF-SITE PROVISION AND PAYMENTS IN LIEU

- 1.16 As a guideline, it is considered that a development adding 200 sq m or more is sufficient to contribute to mix of uses on the site, including a contribution to the supply of housing. Housing may be sought where a proposed increase in office floorspace is less than 200 sq m, where it appears clearly practical for such provision to be made. Where a secondary use is appropriate for the area and cannot be achieved on the site, the Council may seek a contribution to secondary uses in the area, directly related in scale and kind to the development proposed, by means of a planning obligation. It is anticipated that development adding 1,000 sq m or more should provide for mixed use on-site unless the applicant provides clear evidence that off-site provision of secondary uses is more appropriate.
- 1.17 In developments adding less than 1,000 sq m of floorspace, where a secondary use is appropriate for the area but cannot be achieved on site, the Council may accept a contribution to secondary uses directly related in scale and kind to the development proposed, either off-site or, exceptionally, a payment in lieu of provision. Financial contributions will relate to the value of land or airspace needed to provide the secondary use elsewhere. The formula for calculating this will be regularly reviewed and included in supplementary guidance. In either case the expectation will be for the secondary use to be provided in the same locality as the primary use.
- 1.18 Where an off-site contribution to housing is appropriate, the Council will take into account both sites when assessing the level of housing provided. It will seek to negotiate half of the total additional floorspace across both sites as housing. For example, where a scheme provides 1,000 sq m of additional commercial floorspace on the original site, the Council will seek matching provision of 1,000 sq m of housing on the recipient site.

HATTON GARDEN

- 1.19 The replacement of any business space (in Use Classes B1, B2 or B8) by housing in the Hatton Garden area could place pressure on the stock of premises available for small jewellery workshops and related light industry. This could harm the special character of the area as a nationally and internationally important location for the manufacture and trading of jewellery. Therefore the Council will make an exception to the approach set out in DP1 in Hatton Garden. We will accept a smaller proportion of additional floorspace to be provided as housing in mixed use developments in the Hatton Garden area and the inclusion of workshops suitable for the jewellery industry. Please see Core Strategy Preferred Approach CS15 and Development Policy DP27 for more on our approach to Hatton Garden.

SITUATIONS WHEN MIXED USE DEVELOPMENT MAY NOT BE REQUIRED

- 1.20 Circumstances where a mix of uses may not be appropriate include the following:
- where a floorspace increase is required to accommodate an existing user on a single site, for example to provide for expansion of a business;
 - where housing is not compatible with the primary use, such as where noise levels from an industrial use would compromise residential amenity, or where the operational requirements of a specialised use, such as a hospital, academic, or educational institution, would not allow the incorporation of housing;
 - where a secondary use cannot be satisfactorily accommodated by the site or buildings owing to their scale, limited access to street frontage, or heritage considerations.

FURTHER GUIDANCE

- 1.21 Further guidance on mixed use developments, in particular in relation to the inclusion of housing in such schemes is set out in the Council's Camden Planning Guidance supplementary document. The Council's Site Allocations document will allocate specific sites for a mix of uses and provide guidance for their future development.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 1: Delivering Sustainable Development; ODPM; 2005

ALTERNATIVE OPTIONS

- 1.22 Other options considered or suggested regarding mixed use during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. As this issue was considered as part of consultation on issues and options for the Core Strategy, please see the Core Strategy Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Make no requirement for a mix of uses	Promoting a mix of uses is considered to help make the most efficient use of land, provide housing and other beneficial uses, promote the use of buildings and places throughout the day and reduce travel. It is consistent with government guidance in PPS1 – Delivering Sustainable Development, PPS6 – Planning for Town Centres and PPG13 – Transport and the London Plan. Not requiring mixed use in appropriate developments would fail to achieve these benefits and therefore scored poorly in the Sustainability Appraisal.

2 Providing housing and affordable housing

- 2.1 People's well-being is strongly related to their housing and consequently a key policy goal is for national, regional and local government to ensure that everyone has the opportunity to live in a decent home, in a place they want to be, at a price they can afford. Government housing policy seeks to achieve an increase in housing supply, wider access to home ownership of housing, high quality affordable and market housing, quality housing for people who are vulnerable or have specific needs, and sustainable communities that include a range of household types, needs and incomes.
- 2.2 Camden's Core Strategy Preferred Approach CS4 – **Providing quality homes** sets out the general principles of our approach to providing housing and affordable housing. This includes:
- making housing the priority land use of Camden's Local Development Framework;
 - seeking to maximise the overall supply of housing in the borough;
 - providing a range of housing to meet the needs of different groups;
 - seeking affordable housing;
 - requiring homes to meet appropriate standards of amenity and accessibility;
 - preventing the loss of existing homes.
- 2.3 The section below provides detailed planning policies where these are necessary to achieve the approach to providing housing and affordable housing set out in our Core Strategy.

WHAT YOU TOLD US

- 2.4 The main points raised on providing housing and affordable housing during consultation on issues and options for the Development Policies are summarised below.
- There was no consensus on whether we should require a different mix in affordable homes compared to market homes.
 - A number of private sector respondents felt that the Council should not specify a mix in market schemes.
 - Higher education bodies supported the provision of student housing and felt that this should not have to include affordable housing.
 - Measures to promote housing for elderly people were supported; the need for this to properly meet their needs was stressed.
- 2.5 The Development Policies Issues and Options Consultation Statement contains a detailed summary of the comments we received on this matter and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on housing during consultation on issues and options for the Core Strategy.

Additional housing

- 2.6 There is an acute need for additional housing in Camden and a limited supply of land for development. Maximising the supply of housing in the borough is therefore a priority for the Council. We will seek to increase the supply of homes to assist households in unsuitable and overcrowded housing, to cater for a growing population, and to reduce the upward pressure on housing rents and prices.

- 2.7 Core Strategy Preferred Option CS4 – Providing quality homes sets out our overall strategy to ensure that Camden residents have access to a decent home. Preferred Policy DP2 contributes towards delivering this strategy by protecting sites that are suitable for housing development, and maximising the use that is made of them.

Preferred Policy DP2 – Additional housing

The Council will seek to maximise the supply of housing in the borough by:

- expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, unless they are protected for another use;
- protecting sites that are considered suitable for housing, including sites identified in the Site Allocations document and sites with a valid planning consent for housing.

- 2.8 In order to maximise the supply of housing in the borough, the Council will look favourably on schemes for new residential development, new build, conversions and extensions that provide accommodation of an acceptable standard. Please also see Preferred Policies DP3 – **Addressing the needs of specific groups**, DP7 – **Housing with shared facilities or support facilities**, Core Strategy Preferred Approaches CS4 – **Providing quality homes** and CS8 – **Promoting high quality places** which provide more details on the provision of sustainable and inclusive accommodation.
- 2.9 The targets in the London Plan are measures of additional housing units (whether dwellings, rooms in shared accommodation, or pitches for caravans). Given the limited supply of sites in Camden, the targets could most easily be met by developing primarily one-bedroom flats and studios. However, Camden's most pressing housing need is for three- and four-bedroom family dwellings, with two-bedroom dwellings also forming a high proportion of housing need. The maximum use of sites will not be considered solely in terms of the number of dwellings that is proposed, but also in terms of the mix of dwelling sizes needed in the borough and the floorspace that could reasonably be accommodated on the site. Habitable rooms will not generally be adopted as a way of measuring site usage as this encourages the provision of large luxury homes with a small number of occupiers.
- 2.10 High densities will be an important means of making the best use of the scarce amount of land available in Camden by increasing the number of homes provided on a given site. High densities can contribute towards sustainable development and contribute to the viability of local facilities and services by increasing their catchment population. As stated in Core Strategy Preferred Approach CS2 – **Making the best use of our limited land**, the Council will expect the density of housing development to take account of the density matrix in the London Plan (Table 3A.2), and to be towards the higher end of the appropriate density range. Transport accessibility is one of the variables included in the matrix. Preferred Approach CS2 also notes that quality of design, surroundings and amenity will be taken into account.
- 2.11 There is a significant market in Camden for luxury homes that has a high number of habitable rooms and a low number of residents per dwelling. The London Plan density matrix assumes that the number of habitable rooms per dwelling will average between 2.7 and 4.6. If habitable rooms are used to measure density for assessment under the density matrix, dwellings with larger numbers of habitable rooms will distort outcomes to allow a disproportionately low dwelling density. Consequently, the Council will refer primarily to dwelling densities, measured in units per hectare. Given that the majority of the borough has relatively high public transport accessibility and is suitable for development of flats, densities in dwellings should generally fall within the cells towards the right and bottom of the matrix, i.e. 45 to 405 dwellings per hectare.

- 2.12 To maximise the protection of sites identified as suitable for additional housing, the Council will include them as proposed housing sites in the Site Allocations document, and will resist their development for an alternative use. However, a high proportion of the developments that come forward are on small sites, and a high proportion involve redevelopment of sites that are currently in use, which are hard to anticipate. Given the large number of potential housing sites in Camden that cannot be included in the Sites Allocations document, we will also protect:
- sites that have a valid consent for housing, on the basis that their suitability for housing has already been demonstrated; and
 - sites that are not protected for another use by a different policy and are not rendered unsuitable for housing by another constraint.
- 2.13 There are many different types of housing, including many different types of self-contained dwellings (Use Class C3) and many different types of accommodation with shared or support facilities. The Council seeks to protect housing sites for a mix of different types, but not all types will be appropriate on every site. We consider that the greatest numerical need is for self-contained dwellings to meet general needs across a range of household incomes and sizes, rather than for housing with shared or support facilities. This position is consistent with the London Plan's annual monitoring target for Camden, which proposes an annual addition of only 100 units (or 16.8% of the housing total) in the form of non self-contained accommodation. In most circumstances, sites that are considered suitable for housing will therefore be protected for self-contained housing to meet general needs. However, this general protection may be relaxed to provide for other housing types in some circumstances.
- 2.14 **Affordable housing** – Additional affordable housing in Camden will usually be take the form of self-contained housing, forming a part of the provision to meet general needs. Core Strategy Preferred Approach CS4 sets Camden's affordable housing target at 50%, which reflects the level of need in the borough having regard to viability. However, many housing developments in Camden will not deliver 50% affordable housing, either because they are too small to trigger the requirement, or because viability is reduced by a high existing use value or a high development cost. Consequently, it will be extremely difficult for Camden to meet overall affordable housing need across the borough. Existing affordable housing is protected by other policies. The Council will also protect sites that have valid planning consents for an element of affordable housing, or are identified in the Site Allocations document to be developed, in full or in part, for affordable housing. For the proportion of the site allocated for affordable housing, or with a valid planning consent for affordable housing, the Council will resist development for an alternative housing use.
- 2.15 **Specialist housing uses**- It is difficult to identify appropriate sites for some residential uses, such as residential care homes and sites for gypsies and travellers. Sites that are already in these specialist housing uses are protected for that specialist use in the future (subject to appropriate criteria) by other policies. Further sites are expected to be identified for specialist housing uses in the Site Allocations document. Where a site is used or allocated for a specialist housing type, it will protected for that purpose, and the Council will resist development for an alternative housing use. We will also consider releasing sites that are protected for general needs self-contained housing to meet specialist housing needs, however an element of affordable housing will be required for any part of the site that has a valid planning consent for affordable housing or is allocated for affordable housing.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

ALTERNATIVE OPTIONS

- 2.16 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Apply a more flexible approach by not expecting the maximum appropriate contribution to housing supply on appropriate sites	<p>Planning Policy Statement 3 (Housing) and the London Plan emphasise the need to make efficient use of housing land. The Sustainability Appraisal of Core Strategy issues and options highlighted that policies that seek the highest appropriate densities for housing development would provide the greatest benefits in terms of housing delivery and efficient use of land.</p> <p>Given the acute need for additional housing in the borough and limited land, there is a need to maximise the supply of housing throughout the borough and on individual sites.</p>

Addressing the housing needs of specific groups

- 2.17 Planning traditionally takes a stock-based approach to housing. This reflects the Council's powers as a planning authority, which provide very little control over the tenure of housing and the nature of the people that manage and occupy it. Nevertheless, the government's planning policy statement on housing (PPS3) makes it clear that planning authorities must plan for the mix of housing that is likely to be required, and take into account the requirements of particular groups, such as families, older people and people with disabilities. It follows that the Council should consider not only the overall mix of stock that will be needed in future in terms of size and affordability, but also consider how housing can best be planned to meet the requirements of particular groups in terms of the networks that tie them to a particular location, designs that meet social and cultural needs as well providing for different household sizes and physical disabilities, and support models that look beyond formal care in an institutional environment.
- 2.18 These considerations are cross-cutting in every sense. For example, the affordability of housing is often a huge concern for people with disabilities, older people include people with low and high incomes, and people with disabilities include children in large households and adults with dependent children. Religion, cultural and ethnic requirements affect a proportion of the people who require every different type of housing. In considering the types of accommodation appropriate in an individual scheme, the Council will need to pay close attention to evidence in the Housing Needs Survey Update 2008, to the Council's Housing Strategy, and to other related strategies such as the Serving Older People Strategy.

Preferred Policy DP3 – Addressing the needs of specific groups

In considering the mix of housing types across the borough and on individual sites, the Council will take into account the needs of specific groups for:

- links to family and community support networks
- affordable housing
- accommodation suitable for large families and extended families
- accommodation that meets religious, cultural and ethnic requirements
- accommodation with support facilities
- accommodation that is designed or adapted to be suitable for people with particular disabilities.

All additional housing should meet Lifetime Homes standards. 10% of additional housing should either meet Wheelchair Housing standards, or be easily adapted to meet them.

- 2.19 Core Strategy Preferred Approach CS4 – **Providing quality homes** sets out the Council's target of 50% affordable housing as the proportion sought in negotiations on individual sites. It also indicates that affordable housing should be provided as 60% social rented housing and 40% intermediate housing. Preferred Policy DP4 indicates factors that will be taken into account in negotiations to agree the proportion appropriate for a particular site. A key consideration for individual sites will be to consider the variety of household needs that arise within the market housing and affordable housing elements, the differences between them, and the way that this affects the creation of a balanced community.
- 2.20 Preferred Policy DP5 – Housing size mix sets out the Council's expectations regarding the mix of self-contained dwellings sought in developments, looking specifically at the number of bedrooms required. However, in considering the design of housing to meet the different types of household, the Council will also need to have regard to tenure, affordability, culture and religion. For example:
- there is a relative surplus of four-bedroom housing for market rent, but a significant relative need for such housing by people who require market property to buy;
 - worklessness is an issue that goes hand-in-hand with a need for affordable housing, which creates additional pressures on living space from adults, and limits the potential for children to study and to play – small living areas, combined kitchen-diners and shared bedrooms should ideally be avoided for families in affordable housing, as these can reinforce social deprivation;
 - for households of some religious and cultural backgrounds, preparation of food within the living area is not appropriate, and a proportion of separate kitchens should be provided to meet these requirements wherever possible.
- 2.21 Accommodation with support facilities may be needed by a wide variety of groups, including older people, people with learning disabilities, homeless people, and people with alcohol or drug dependencies. See Preferred Policy DP7 for more consideration of the housing requirements of these groups. In many cases, provision for people in these groups will be made in housing with shared facilities and on-site support, under the approach set out in Preferred Policy DP8. However, in planning for accommodation with on-site support facilities for a particular group such as older people, a key consideration will be the extent to which support can be provided within the community, enabling people to live relatively independent lives in their own homes.

- 2.22 Core Strategy Preferred Approach CS4 considers that additional homes should be designed to meet the accessibility needs of different age-groups, and include a proportion of wheelchair housing. In accordance with the London Plan, the Council expects all additional housing to meet Lifetime Homes standards. A Lifetime Home is an ordinary home that supports the changing needs of a family's lifecycle, from raising children through to mobility issues in old age – essentially allowing people to live in their home for as much of their life as possible. Lifetime Homes involve 16 design features that have been tailored to foster accessible living, helping to accommodate pregnancy, pushchairs, injury, disability and old age. These features also allow a dwelling to be easily adapted for even higher levels of accessibility in the future, if the need arises.
- 2.23 Lifetime Homes standards have been developed by the Joseph Rowntree Foundation, and exceed the requirements of Building Regulations (Part M). They are applied to all developments of self-contained housing, including conversions, reconfigurations and changes of use. The standards do not apply to student housing. The Council acknowledges that the design of some existing properties will preclude meeting all 16 standards, particularly where constraints such as Listed Building status apply, but considers that achieving as many features as possible will still be helpful to future residents. Proposals should be accompanied by a submission showing how each of the 16 standards will be met, and full justification for failure to meet any individual standard. New build schemes are expected to incorporate all 16 features. Further information on Lifetime Homes can be found in our Camden Planning Guidance supplementary documents.
- 2.24 To provide independence and quality of life for wheelchair users, a proportion of housing is required to meet their needs, which the Council sets at 10%, in accordance with the London Plan. Ideally, wheelchair housing should be tailored to the specific needs of an individual wheelchair user and their household. Wheelchair Housing standards are concerned primarily with outcomes in terms of how rooms and spaces can be used, rather than specifying fixed heights and widths. Tailoring housing to the occupier is rarely possible in proposals for speculative market housing developments, however it can be achieved for affordable housing, where future occupiers can be identified by local housing managers, from the Housing Register (waiting list), and from transfer lists.
- 2.25 The Council expects 10% of market dwellings either to meet wheelchair housing standards, or be designed so a future occupier can easily adapt the dwelling to meet wheelchair housing standards. The Council expects 10% of social rented dwellings and 10% of intermediate housing to be designed and built to meet the wheelchair housing standards.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Accessible London: achieving an inclusive environment – London Plan Supplementary Planning Guidance; Mayor of London; 2004

ALTERNATIVE OPTIONS

- 2.26 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not set out criteria for addressing the housing needs of specific groups

The alternative option is not considered to be consistent with the London Plan which states that borough plans **should identify and address the needs of the diverse groups in their area (Policy 3A.17)**. The Council's preferred approach is aim for Camden residents to have access to a decent home, which involves planning for the housing needs and accommodation types of the range of groups that make up Camden's community.

Providing affordable housing

- 2.27 Core Strategy Preferred Approach CS4 – Providing quality homes sets out the Council's target proportions for affordable housing, social rented housing and intermediate housing. There are many constraints and considerations that will affect the proportions appropriate on individual sites and Preferred Policy DP4 indicates the Council's approach to site specific negotiations.
- 2.28 DP4 sets out our approach to proposals for self-contained housing in Use Class C3. The Camden Housing Needs Survey Update 2008 proposed an appropriate proportion of affordable housing for the borough based on an assessment of households that require self-contained accommodation. However, affordability is a consideration that applies to all different housing, as indicated in Preferred Policies DP3 and DP8. When considering proposals for other forms of housing, the Council will take into account their affordability to prospective occupiers, and may seek legal agreements to control housing costs and secure an affordable element. Through Preferred Policy DP6, the Council also seeks to protect existing affordable housing, whether or not it is self contained.
- 2.29 Preferred Policy DP4 does not apply to genuine student housing, and nor does student housing constitute affordable housing. Student housing does not meet general housing needs, is not commonly available for the full calendar year, and usually includes shared facilities, so elements cannot be allocated to meet the Council's priority affordable housing needs. To ensure that student housing developments will genuinely meet student needs, the Council will seek to ensure that units cannot subsequently be let or sold as general market housing, and that accommodation costs per student are less than general market housing costs for a one bed flat in the borough. In accordance with Preferred Policies DP2 and DP6, a student housing development should include an element of affordable housing if any part of the site is allocated for affordable housing, has a valid planning consent for affordable housing, or was last used for affordable housing.

Preferred Policy DP4 – Providing affordable housing on individual sites

The Council will expect all residential developments with a capacity for 10 or more dwellings to make a contribution to the supply of affordable housing.

The Council will apply the 50% affordable housing target flexibly, with regard to a sliding scale from 10% to 50% for developments with capacity for fewer than 50 dwellings.

In considering the scale and nature of the affordable housing contribution sought on individual sites, the Council will also take into account:

- site size, and feasibility of providing a mix of market and affordable tenures;
- economics of the development and any particular costs associated with it;
- access to public transport, services and facilities;
- other planning objectives considered to be a priority for the site.

The Council will normally expect the affordable housing contribution to be made on site, but where this demonstrably cannot practicably be achieved on site, the Council may accept the provision of affordable housing off-site, or exceptionally a payment-in-lieu.

DEFINITIONS

- 2.30 Core Strategy Preferred Approach CS4 indicates that Camden will apply an affordable housing target at 50%, and within this a split of 60% social rented housing and 40% intermediate housing, to reflect the level of need in the borough, the ability of households in housing need to meet the costs of different types of affordable housing, and the viability of housing development. Social rented housing is housing managed by the Council or a Registered Social Landlord, such as a Housing Association, and subject to target rents determined through a national rent regime. Intermediate housing is housing that is affordable to those on moderate incomes, including essential workers (also known as 'key workers'). Intermediate housing may involve a variety of housing types and tenures, but should be available at housing costs substantially below the local market price or rent for standard self-contained accommodation suitable for households in need.
- 2.31 Detailed definitions of affordable housing, social housing and intermediate housing are contained in the Government's Planning Policy Statement on Housing (PPS3) and the London Plan. Where development involves affordable housing, the Council will seek a legal agreement to secure the continuing availability of the affordable element at costs in line with the London Plan, and to ensure that the affordable element is targeted at those in need of affordable housing, either by nomination arrangements or occupancy criteria. The target incomes at which households should be able to access affordable housing are regularly updated through the London Plan, the London Plan Supplementary Planning Guidance on Housing and the London Plan Annual Monitoring Report.

CAPACITY FOR 10 OR MORE DWELLINGS

- 2.32 The Council considers that all developments with capacity for 10 or more dwellings should contribute to affordable housing in Camden, but that capacity needs to be considered carefully, and a flexible approach is needed towards developments with capacity for 50 or fewer dwellings, on the basis of the following considerations:
- small sites provide a high proportion of the additions to housing stock in Camden¹, and if they are developed for market housing they currently make no contribution to affordable housing;
 - experience suggests that wherever a threshold is set in terms of dwelling numbers, many schemes that might otherwise exceed the threshold are reduced in scale to avoid triggering an affordable housing requirement ² ;

¹ Camden's 2006/07 Annual Monitoring Report indicates that 64% of completed dwellings in 2006/07 were in schemes of 14 dwellings and fewer. Taking a threshold of 10 dwellings, the proportion of dwellings completed in schemes below the threshold drops to 53% for 2006/07 (unpublished LB Camden Development Monitoring).

² Thresholds for Affordable Housing Requirements (Three Dragons and others), GLA 2003, paras 3.32 and 3.40; Camden 2006/07 Annual Monitoring Report, para 4.17.

- experience suggests that wherever a threshold is set in terms of dwelling numbers, many schemes that might otherwise exceed the threshold are reduced in scale to avoid triggering an affordable housing requirement ;
- development costs per unit are higher for small schemes³; and
- management costs can be high for affordable housing within small developments of flats.

- 2.33 The consideration of site capacity will take into account the density matrix in the London Plan (Table 3A.2), and the guidance given about how the matrix should be used in Camden associated with Core Strategy Preferred Approach CS2 and Preferred Policy DP2. Other considerations will include whether:
- large dwellings are proposed, or the site could more appropriately be used for a dwelling mix with a high proportion of small dwellings;
 - the appropriateness of the proportion of non-residential floorspace included as part of a mixed-use development, and whether non-residential elements meet other planning objectives or meet a demonstrable need, and;
 - adjacent sites could be incorporated in the development site to increase its capacity, and the applicant has not demonstrated that potential for a comprehensive development has been fully explored.
- 2.34 The Council adopted a threshold of 15 or more units to trigger affordable housing requirements in 2000, and has subsequently monitored a disproportionate number of proposals for 14 dwellings. We will therefore seek to operate the 10 dwelling capacity and the 50% target in a way that ensures that sites make the maximum contribution they can to the overall supply of housing and supply of affordable housing. The Council considers that a floorspace of 1,000 sq m is capable of accommodating 10 family dwellings. The affordable housing requirement expressed in Preferred Policy DP4 will apply to all developments that would provide additional built residential floorspace of 1,000 sq m (gross). This is consistent with the cells in the London Plan density matrix that apply to most parts of Camden. Policy DP4 may also be applied to schemes of less than 1,000 sq m (gross) residential floorspace where the factors noted in the preceding paragraph suggest that the site has capacity for 10 or more dwellings. Our Camden Planning Guidance supplementary document gives further information on how capacity for 10 dwellings and 1,000 sq m should be assessed.
- 2.35 The Council is aware that the 50% affordable housing target cannot be delivered for schemes that are close to the threshold, and is unlikely to be deliverable for schemes which provide less than 3,500 sq m of housing (approx 35 dwellings). This situation arises because smaller schemes have a relatively low viability, and because a 50% target implies that an 20 dwelling scheme would be needed to produce more than 9 market dwellings. The Council will take the following positive measures to encourage developers to bring forward schemes that reach or exceed the 10 dwelling threshold:
- Affordable housing targets will not apply to residential floorspace already on site (whether retained or replaced as part of a redevelopment), although all existing housing floorspace and affordable housing floorspace will be protected by Preferred Policy DP6.
 - The 50% target will operate on a sliding scale, subject to development viability, with a norm of 10% for 1,000 sq m (gross) of additional housing and 50% for 5,000 sq m (gross) of additional housing – considered to be sites with capacity of 10 dwellings and 50 dwellings respectively.
 - The Council will take a flexible approach to provision of off-site housing for schemes close to the affordable housing threshold – between 1,000 sq m (gross) of additional housing and approximately 3,500 sq m (gross) of additional housing.

³ Thresholds for Affordable Housing Requirements (Three Dragons and others), GLA 2003, para 4.8.

Our Camden Planning Guidance supplementary document will give full details of the Council's approach to ensuring that the threshold and target levels do not reduce the overall supply of housing.

FACTORS TO TAKE INTO ACCOUNT IN NEGOTIATING THE PROPORTION OF AFFORDABLE HOUSING

- 2.36 **Feasibility of providing a mix of market and affordable tenures** – The Council acknowledges that it is not usually possible for social rented housing and market housing to share the same stair core and communal inside spaces. This is due to the higher costs and maintenance requirements associated with the management, materials and finishes that are favoured for market housing, and the legal provisions that prevent a differential service charge between market housing and affordable housing that share common service arrangements. Introducing additional entrances and stair cores for affordable housing will be difficult on constrained sites, and can reduce the viability of development. These factors will be taken into account in negotiations, particularly where relatively small sites are involved or an off-site affordable housing contribution is being considered.
- 2.37 **Development economics and costs** – In negotiating the provision of affordable housing and the level appropriate to a particular site, the Council will consider the full range of costs, benefits and planning objectives associated with a development. These may include costs associated with contaminated land, heritage considerations (such as restoration of a listed building), and environmental considerations (such as environmental improvements for regeneration of an area). Where a development will not meet the Council's affordable housing target, the Council will seek a financial appraisal to justify the proportion of affordable housing proposed. Further details of financial appraisal mechanisms are provided in our Camden Planning Guidance supplementary document.
- 2.38 We recognise that achieving the affordable housing target on most sites will require public subsidy. The Council will therefore regularly review its supplementary documents to indicate how we will negotiate provision in the light of government funding, the extent of the Council's own affordable housing fund, and prevailing land values and construction costs.
- 2.39 **Access to public transport, services and facilities** – Generally, sites within the borough have a sufficient level of access to local amenities and public transport to allow for on-site provision of affordable housing. The Council will not exempt a site from on-site provision on these grounds unless there is a demonstrable lack of essential services accessible from the site.
- 2.40 Preferred Policy DP5 will be taken into account when considering the appropriate mix of units on a site. There are very few opportunities for housing development in the borough where all units have direct ground floor access. The Council will not consider a lack of direct ground floor access to justify exempting a site from providing a mix of affordable units, including large units.

CONTRIBUTING TO THE SUPPLY OF AFFORDABLE HOUSING OFF-SITE

- 2.41 Identified housing sites in the borough are scarce, and there are particularly few sites available at land values that enable them to be developed entirely for affordable housing. Consequently, developer contributions to affordable housing should generally be made on-site (including on mixed-use sites). However, the Council acknowledges that there may be situations where a site is suitable for affordable housing, but it can be demonstrated that it is not practical to include affordable housing as part of a market housing development. In these situations, the Council will initially seek off-site provision on a specified site or sites. If a site cannot be identified for the off-site affordable housing contribution, the Council will then consider an agreement to secure a specified affordable housing contribution within a specified timescale on an unidentified site or sites. If a specified affordable housing contribution cannot be agreed, the Council may exceptionally agree to accept a financial contribution towards affordable housing.

- 2.42 In negotiating the extent of any off-site contribution, the Council will consider the factors set out in Preferred Policy DP4, including the sliding-scale applied to the 50% target. The 50% affordable housing target applies across the borough as a whole, so the Council will seek to ensure that the target is applied collectively across all sites involved in any agreement. The provision across the sites together should approach 50% as closely as possible, having regard to the sliding scale and to development economics and costs. For example, where a site is developed for 20 dwellings, the sliding target would be 20%. If an off-site affordable housing contribution is agreed, the target for off-site provision will not be 20% of the on-site element, but 20% of the schemes together, i.e. 5 dwellings. Applied in this way, the target calculation takes account of the additional market housing achieved on the original site. Further guidance on the calculation of affordable housing proportions for off-site contributions are given in our Camden Planning Guidance supplementary document.
- 2.43 In considering whether an off-site contribution is appropriate, the Council will also consider whether:
- a) physical constraints of the site or premises would make on-site affordable elements impractical for management purposes;
 - b) the management or service charges of an on-site scheme would be too costly for Registered Social Landlords or affordable housing occupiers to meet;
 - c) a reduced percentage of affordable housing is appropriate on-site, for example because it is not practical to include both social rented and intermediate housing;
 - d) particular costs associated with the development would require an excessively high amount of subsidy for on-site provision, but the economics of the development do not preclude making an off-site affordable housing contribution;
 - e) Housing Corporation or alternative funding is unlikely to be secured within a reasonable time scale to enable an on-site scheme;
 - f) an off-site contribution will maximise the overall delivery of housing and affordable housing.
- 2.44 In order to achieve balanced communities, where off-site provision of affordable housing is to be made by the developer, the Council will seek a legal agreement to ensure that the provision is made in reasonable proximity to the proposed market housing. The method for calculating an appropriate level of financial contribution will be set out in our Camden Planning Guidance supplementary document.

VARYING THE PROPORTION OF SOCIAL RENTED HOUSING AND INTERMEDIATE HOUSING

- 2.45 The Council may grant planning permission for developments led by affordable housing. Schemes are considered to be affordable housing-led if they provide substantially more than 50% affordable housing. Although the guideline proportions for social rented and intermediate housing will generally apply, schemes led by affordable housing may exclude social rented or intermediate housing where this is warranted by the characteristics of the site or area or the economics of the development, provided that there is a demonstrable need for the type of housing proposed. Some forms of intermediate housing are being developed that require limited or no public subsidy, but are still offered for rent or sale at prices that are affordable compared with standard self-contained flats, and proposals that provide 100% dwellings of this type may be viable and acceptable. When considering proposals for development led by affordable housing, the Council will take account of their likely impact on the social balance of the local community.

CAR PARKING FOR AFFORDABLE HOUSING

- 2.46 Many of those in need of affordable housing, particularly existing social housing tenants, already own a private car. In some cases, affordable housing residents may need a car in association

with their job. So that new affordable housing is able to meet the housing needs of such residents, it will sometimes be appropriate to provide parking spaces for new affordable housing. The Council therefore considers that where development involves market housing in conjunction with social and/ or intermediate housing, a proportion of any off-street car-parking spaces should be available to households in each housing type.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Thresholds for Affordable Housing Requirements (Three Dragons and others), GLA 2003
- Planning Policy Statement (PPS) 3 – Housing

ALTERNATIVE OPTIONS

2.47 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Maintain a threshold of 15 units at which housing developments contribute to affordable housing	The Council’s preferred option is for a 10 unit threshold for affordable housing. This is consistent with the London Plan and reflects the fact that small sites provide a high proportion of Camden’s housing provision. Camden has been applying a 10 unit threshold since the publication of the Further Alterations to the London Plan in February 2008 and therefore this approach has been demonstrated to be viable in the borough.
Apply a more flexible approach in terms of accepting payments in lieu for particular types of schemes, such as schemes just over the threshold.	Government guidance on housing (PPS3) sets out a presumption that affordable housing will be provided on development sites. Our preferred approach that payments in lieu should be accepted only in exceptional circumstances is consistent with PPS3. This provides more certainty in the delivery of affordable housing than the alternative option and is therefore considered to better contribute to meeting housing needs in the borough.

Housing size mix

2.48 The need to provide a balanced housing stock of various sizes is recognised by Core Strategy Preferred Approach CS4 – **Providing quality homes**. Camden’s Housing Needs Survey Update 2008 identified the need for a range of property sizes in all sectors, and most particularly for large family accommodation in the social housing sector. Preferred Policy DP5 aims to secure housing developments with both large and small units. This policy applies to new build housing schemes, schemes to reconfigure or subdivide residential properties and to all changes of use to housing (in use class C3) from other uses.

Preferred Policy DP5 – Housing size mix

The Council will seek to create a balanced supply of small and large dwellings by:

- ensuring that residential development provides an appropriate mix of dwelling sizes, including large and small units;
- considering the mix and sizes appropriate to the development in terms of affordability, tenure and child density, taking into account the character of the development and the locality; and
- having regard to the proportion of market housing needed for each household size, and the proportion of one, two and three-or-more bedroom affordable dwellings required.

- 2.49 In order to achieve mixed and balanced communities, the Council will seek a mix of unit sizes in all developments of self-contained housing (Use Class C3) intended to meet general needs – including market and affordable housing. This aim will be applied with some flexibility, particularly for conversions and for small developments on constrained sites, and the Council will have regard to achieving efficient layouts and vertical stacking arrangements for flats.
- 2.50 For proposals intended to meet special needs, for specialist housing proposals, and for sites (or parts of sites) protected for specialist housing uses, the Council will have regard to the forms of housing best able to meet the needs of the likely occupiers, taking into account Preferred Policies DP3, DP7 and DP8. The Council will consider the potential for including these types of housing in association with development of general needs housing, subject to the overall borough housing target, subject to the overall priority the Council gives to people who are unable to access market housing or are vulnerable, and subject to the approach set out in association with Preferred Policy DP2 – **Additional housing**.
- 2.51 In considering the mix appropriate to a general needs development, the Council will pay attention to the needs of larger households and children. We will seek to take advantage of the potential for family housing in locations where there is existing open space nearby, or external amenity space can be made available, but will have regard to the potentially negative impacts of high child densities. The Council will also take into account the flexibility that larger dwellings create, allowing for arrangements such as shared households and adults caring for elderly or infirm relatives, as well as adults with young children. Given the dense urban character of much of the borough, Camden's need for large dwellings will not be met if large dwellings are sought only in areas where amenity space is available, or restricted to areas away from main roads, Central London and town centres.
- 2.52 The Housing Needs Survey Update 2008 provides detailed information on the size of affordable dwellings required. It provides less information relating to the types of households needing market housing, which reflects the wider range of choices available to these households (for example, their ability to afford larger dwellings outside the borough).
- 2.53 For social rented housing, the 2008 Update indicates a need for dwellings of every size, from one-bedroom through to 4-or-more bedrooms⁴. If the annual supply is taken into account, the need that would take the longest to meet is for 4-or-more bedroom social housing – the annual need is over ten times the annual supply⁵. The annual social housing need is also over twice the supply for two- and three-bedroom dwellings.

⁴ LB Camden Housing Needs Update 2008 table 6.9

⁵ LB Camden Housing Needs Update 2008 table 6.10

2.54 For intermediate housing, the 2008 Update also indicates a need for dwellings of every size, with 1-bedroom dwellings needed by the largest number of households, and 2-bedroom dwellings by a substantial (but very much smaller) group⁶. The annual supply of existing intermediate housing is too small to have a significant bearing on the intermediate housing mix required in future developments. A cautious approach must be taken to the mix of households needing intermediate housing. A large proportion of these households can only afford something marginally more expensive than social housing, and are unlikely to find intermediate dwellings that they can afford in Camden. Those that can afford costs close to the cost of market housing will often stretch their incomes to move into the market. Consequently, other types of housing are likely to take up a considerable proportion of the need that could theoretically be met by intermediate housing.

2.55 Where development includes affordable housing, the appropriate mix will take into account:

- the focus of social-rented housing need on 4-or-more bedroom dwellings, and on other dwellings with 2-or-more bedrooms; and
- the focus of intermediate housing need on dwellings with one bedroom, and to a lesser extent two-bedroom dwellings.

More detailed guidance on the preferred affordable housing mix is contained in the Council's Camden Planning Guidance, supplementary document.

2.56 For market housing, the 2008 Update suggests a different methodology, taking into account the annual target for additions to the housing stock, and the likelihood that households will stretch their incomes to move into the market, will continue to live in an existing household (with parents for example), will move outside the borough, or will remain outside the borough⁷. Private rented accommodation and owner occupation are calculated separately, although the tenure of permanent market housing is not controlled by the planning system. Broadly, the 2008 Update suggests there is a need for market housing across all dwelling sizes, from one-bedroom through to 4-or-more bedrooms. The need can be broadly met by existing supply for most dwelling sizes, however, there is a shortfall for all dwelling sizes involving 2-or-more bedrooms. The 2008 Update suggests that 51% of the additional market housing need is for 2-bedroom dwellings, 22% is for 3-bedroom dwellings, and 27% is for 4-bedroom dwellings⁸. The Council considers that dwellings with 3-or-more bedrooms are sufficiently flexible to meet the majority of market housing needs, and will seek a proportion of these as part of developments wherever appropriate to the character of the development and the locality.

2.57 Specifically, development of market housing should generally contain at least one dwelling with 3-or-more bedrooms if external amenity space or open space can be made available, or there is existing open space nearby. Where conversion to a different mix of market housing is proposed in similar circumstances, the Council also expects retention of at least one 3-or-more bedroom dwelling where any exists. The Council will resist development proposals for self-contained general needs housing (whether for new-build dwellings, changes-of-use or residential conversions) that contain only one-bedroom and studio flats. Developments should be arranged to provide access as directly as possible from the 3-or-more bedroom dwellings to the external amenity space, open space or street entrance.

2.58 The Council produces residential space standards that indicate the amount of internal space appropriate for dwellings intended to accommodate different numbers of occupiers. These are published in our Camden Planning Guidance supplementary document.

⁶ LB Camden Housing Needs Update 2008 table 6.9

⁷ LB Camden Housing Needs Update 2008 chapter 7

⁸ LB Camden Housing Needs Update 2008 table 7.9

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

ALTERNATIVE OPTIONS

- 2.59 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Set out specific targets for housing size mix, including for larger housing	The Camden Housing Needs Survey Update 2008 contains information on the mix of homes needed in the borough. It provides detailed information on the size of affordable dwellings required, but less information relating to the types of households needing market housing, which reflects the wider range of choices available to these households. The Survey identifies a need for a range of sizes of homes, including large and small homes. Detailed targets setting out specific proportions of housing sizes sought in every development is not considered to be appropriate as this would not allow the specific circumstances of individual schemes and locations to be taken into account.

Preventing the loss of housing and affordable housing

- 2.60 The need to retain existing housing and affordable housing is listed as a key aim for the Council within the Core Strategy Preferred Approach CS4 – Providing quality homes. The net loss of residential floorspace and dwellings would undermine this aim and the objective to meet our housing target of 595 additional homes per year as set out in the London Plan. Preferred Policy DP6 will support this aim by preventing the loss of permanent residential floorspace (including permanent residential accommodation within hospitals and care homes), preventing the conversion of permanent residential accommodation to short-stay accommodation, resisting the loss of affordable housing, and resisting significant net losses of dwellings. Preferred Policies DP7 and DP8 protect other types of residential accommodation, excluding hospitals and care homes where patients are not permanent, and hostels aimed at backpackers and tourists.

Preferred Policy DP6 – Preventing the loss of housing and affordable housing

The Council will seek to prevent the loss of housing and affordable housing in the borough by:

- protecting residential uses from development that would involve a net loss of residential floorspace, except where the loss would allow provision of small-scale health facilities that are needed locally and cannot be provided on an alternative site;
- protecting permanent housing from conversion to short-stay accommodation intended for occupation for periods of less than 90 days;
- protecting affordable housing from development that would involve a net loss of affordable housing floorspace;
- resisting the developments that would involve the net loss of two or more homes, unless they:
 - > create large affordable dwellings, or
 - > create large homes a part of the Borough with a relatively low proportion of large dwellings, or
 - > enable sub-standard units to be enlarged to meet residential space standards.

RESIDENTIAL FLOORSPACE THAT IS PROTECTED, AND THE EXCEPTION FOR HEALTH FACILITIES

- 2.61 Preferred Policy DP6 is concerned primarily with protecting floorspace that provides permanent self-contained housing (in Use Class C3). The vast majority of households in Camden live in self-contained housing, and this form is expected to account for approximately 495 additional homes annually within Camden's housing target of 595⁹.
- 2.62 The Council will consider Preferred Policy DP6 alongside Preferred Policies DP7 and DP8 when considering proposals to develop residential institutions (within Use Class C2) for an alternative use. In these cases, the floorspace protected will apply to those parts of the institution previously in permanent residential use. This includes staff housing, dormitories, residential patients' accommodation, and the internal communal and circulation space associated with them.
- 2.63 Small-scale healthcare facilities (such as GPs and dentists) are often provided in residential areas to ensure they are easily accessible to the people that need them. In the past, surgeries have sometimes been converted from housing, although such conversions will often not now easily meet modern space requirements and fully provide for people with mobility difficulties. Nevertheless, the Council acknowledges that the loss of housing to provide health facilities may sometimes be the only available option, for example where redevelopment or refurbishment creates a temporary need to relocate a service nearby. Where such a development is proposed, the Council will expect supporting evidence to show that the Primary Care Trust have identified a local need for the use, no alternative non-residential site is available in the local area, and that development will serve a local catchment area. If there is no longer a need for these health facilities, then the site will be expected to return to residential use.

SHORT-STAY ACCOMMODATION

- 2.64 There is a demand for short term and temporary accommodation in the borough, primarily to provide for visitors. This accommodation falls outside the Council's land-use priority for housing, and new demand should be met from appropriate sites in non-residential rather than permanent

⁹ The London Plan (Consolidated with alterations since 2004) annex 10A

residential use. The Council will resist development that changes permanent housing into accommodation let for periods of less than 90 days¹⁰. Proposals relating to hostels that provide for special needs groups (such as people at risk from domestic violence and homeless people) will be assessed with regard to Preferred Policies DP7 and DP8. However, housing and other permanent residential accommodation (generally within Use Classes C2 and C3) should not be lost to uses that are generally intended for stays of less than 90 days.

AFFORDABLE HOUSING

- 2.65 Redevelopment and changes-of-use of use that involve the loss of existing affordable housing would worsen the acute shortage of affordable housing referred to in connection with Core Strategy Preferred Approach CS4 – **Providing quality homes**, and will generally be resisted. Existing affordable housing referred to in connection with Preferred Policy DP6 relates primarily to stock let by the Council or Registered Social Landlords (primarily Housing Associations), and to affordable housing within residential institutions (within Use Class C2). Affordable housing within residential institutions usually takes the form of housing for nurses and other healthcare workers within hospitals and residential care homes.
- 2.66 The Council will not generally resist proposals to redevelop, refurbish or reconfigure existing affordable housing where these do not reduce the overall affordable housing floorspace. Also we will not seek to resist changes to the uses of floorspace within the existing site boundary of a residential institution where it does not change the overall C2 use of the site.
- 2.67 Replacement affordable housing may take the form of redeveloped or refurbished floorspace. It should generally include at least as much social housing floorspace and intermediate housing floorspace as previously existed. However, the mix of affordable housing sought under Core Strategy Preferred Approach CS4 and Preferred Development Policies DP4 and DP5 will also be taken into account. The Council will take a strategic approach to estate renewal, ensuring that there is no net loss of affordable housing floorspace, but taking into account regeneration potential and the benefits of mixed and balanced communities. Preferred Policy DP4 will guide the assessment of any proposals to provide replacement affordable housing on an alternative site.

THE LOSS OF HOMES

- 2.68 As indicated in connection with Core Strategy Preferred Approach CS4 – Providing quality homes, the annual target of 595 additional homes per year is a net figure, and given projected housing delivery in the Borough, there is no scope for loss of existing homes. Where development involves the demolition or other loss of housing, the Council will generally expect a similar or greater number of replacement dwellings, to an equivalent or greater standard than the housing removed.
- 2.69 There is currently considerable downwards pressure on the number of dwellings in Camden from proposals to combine a number of smaller units into larger ones. Such change may well be justified within the affordable housing stock, where there are severe problems of overcrowding and a relative surplus of one-bed dwellings. However, there is no comparable mismatch across the borough's market sector, and typical layouts suggest that merger of existing market homes is largely geared to a demand for high value housing with luxury facilities rather than the creation of additional bedrooms for large families. Consequently, schemes that would create a loss of more than one residential property will generally be resisted¹¹.

⁹ LB Camden Housing Needs Update 2008 table 6.9

¹⁰ A change to lets of less than 90 days is considered to be a material change-of-use under the Greater London Council (General Powers) Act 1973 (as amended)

¹¹ Changes which involve the loss of a single unit will commonly be outside planning control.

- 2.70 There is a particular shortage of large family houses for social rent in Camden, as identified in connection with Preferred Policy DP5. Opportunities to reduce this shortage and reduce overcrowding could arise by reconfiguring or redeveloping existing housing stock, especially the existing stock of Council housing, which contains a disproportionate number of one-bedroom dwellings. The Council will favourably consider proposals that create large affordable housing for families by combining or redeveloping smaller dwellings provided that there is no overall loss of residential floorspace.
- 2.71 Some housing in the borough does not conform with current residential space standards, usually homes that were developed before the standards were introduced or were developed without the benefit of planning consent. Where existing homes fall substantially below the residential space standards set out in our Camden Planning Guidance supplementary document, the Council may consider proposals involving the loss dwellings in order to meet the standards. We will consider proposals favourably if existing homes are 20% or more below the standards and the loss of dwellings is no greater than is necessary to meet the standard.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

ALTERNATIVE OPTIONS

- 2.72 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not seek to protect existing housing	This option would fail to address the need to provide significant additional housing to meet need and demand in the borough, and could jeopardise the achievement of the borough's housing target as any homes lost would need to be replaced elsewhere putting greater pressure on the limited number of housing sites in Camden. It would also be contrary to London Plan policy 3A.15 which states that DPD policies should prevent the loss of housing without its planned replacement at existing or higher densities.
Allow the loss of flats throughout the borough when this creates larger homes	This approach would lead to a loss of smaller units, reducing the number of homes available in Camden and reducing choice for those on middle incomes. It would also fail to make the most efficient use of land by reducing residential densities. In addition the alternative approach is considered to be contrary to London Plan policy 3A.15.

Housing with shared facilities or support facilities

- 2.73 There is a significant stock of housing in the Borough that is not self-contained, which includes different categories of housing with subtly different roles. The categories covered under these preferred options are as follows.
- 2.74 **Houses in multiple occupation** – These are commonly known as bedsits. Individual rooms are let out separately, and there is no particular link between the occupiers of different rooms, but some facilities such as bathrooms and kitchens are shared. They do not fall into a use class, so any material change to the use is classed as development.
- 2.75 **Hostels (excluding youth hostels and backpackers' hostels)** – There is usually a link between occupiers in terms of age group or circumstances. The type of occupier varies widely, from students to people at risk from domestic violence. A hostel involves some kind of common management regime, which may involve little more than letting arrangements, but may provide communal eating arrangements or meet other support needs. Hostels do not fall into a planning use class, so any material change to the use is classed as development.
- 2.76 **Nurses' or healthcare workers accommodation within hospitals and residential care homes** – This often takes the same form as hostel accommodation, but it falls within Use Class C2 (residential institutions) if it is provided primarily to people who work on-site. A change of use is not involved if the accommodation is converted for other hospital or care home activities. However, planning controls apply if the accommodation is refurbished or redeveloped for a use outside Use Class C2.
- 2.77 **Residential care homes** – These provide a significant level of support or nursing care, for example to elderly people and people with disabilities. They are part of Use Class C2, which includes residential colleges and hospitals.
- 2.78 In addition to its land-use planning function, the Council has a wide variety of roles in connection with this type of housing. We manage a stock of care homes and hostels, find accommodation for people who need it, and inspect facilities to make sure they meet appropriate standards under the Housing Act 2004.
- 2.79 There is little direct government guidance on planning for these types of housing. Guidance nevertheless indicates that authorities should plan for a mix of different households, should consider tenure and price, and should plan for specific groups including older and disabled people. The London Plan goes further, referring to the housing choice and the housing requirements of different groups, requiring development policies for special needs housing and care homes, protecting existing hostels and shared accommodation, and including housing that is not self-contained in the targets for additional provision.

Preferred Policy DP7 – Groups using housing with shared facilities or support facilities

The Council will have regard to the housing needs of groups that traditionally use housing with shared facilities or support facilities, and will seek to meet their needs as far as possible in the context of the overall housing stock, the potential for them to live in self-contained housing, and competing demands for resources.

- 2.80 Housing with shared facilities or support facilities has traditionally accommodated people from a vast range of groups. Housing some of these groups is the direct responsibility of the Council as the housing authority, and for many the Council will also have a social care role. The Council also has a partnership role in housing or supporting some groups, in conjunction with Camden Primary Care Trust, Housing Associations, charitable groups and the private sector. For some groups, Camden's primary housing role is to provide information. As a planning authority, the Council's role is to secure a range of housing stock to meet different needs as fully as possible.
- 2.81 Groups whose accommodation needs are often met by housing with shared or support facilities include the following:
- **Young adults and students** – A large proportion of young adults and students will find accommodation by forming small household groups and renting family-sized flats. A proportion of intermediate housing (in the affordable sector) is also aimed at nurses and other key workers falling within this group. However, people in this group also commonly rent rooms in houses in multiple occupation in the private sector, or rooms in student hostels/ halls of residence (some provided by higher education institutions, some by the private sector).
 - **Older people** – Older people usually prefer to stay in their own homes, live independently in sheltered housing, or be cared for by their families. Those older people that do have significant support needs will often live in residential care homes, provided by the Council, Housing Associations, charities and the private sector. The Council supports the provision of Extra Care homes, which involve accommodation for independent elderly people and people with support and nursing needs on the same site.
 - **People with learning disabilities** – People with learning disabilities have different housing options, depending on their independence and support needs. Groups of people with learning disabilities who live together as a single household with a limited amount of support may occupy general needs family dwellings.
 - **People at risk from domestic violence** – This group will commonly need specialist refuge accommodation, provided by the Council or another specialist organisation on a temporary basis until a permanent housing solution can be found.
 - **Single homeless people** – In the past, people in this group have been housed in Council-managed hostels for long periods. Often, other factors such as mental health problems or alcohol dependency have contributed to homelessness. The Council now adopts a pathways approach, which is intended to equip single homeless people for independent living, and give them support in finding permanent accommodation.
 - **Homeless families** – The Council currently manages a significant stock of housing for homeless families, but we are establishing more support mechanisms to help homeless families find permanent accommodation, reducing the need for shared family accommodation.
 - **Looked-after children** – There is no significant stock of housing in the borough for looked-after children.
 - **Other groups at risk of homelessness or needing managed accommodation** – There are many other people whose circumstances mean they are unlikely to be able to access independent accommodation, including young people leaving care, people with mental health problems, people with alcohol or drug dependencies, people awaiting trial and ex-offenders. These represent small groups in Camden, but with very different needs that should be taken into account in decision making regarding the stock of housing with shared or support facilities.
- 2.82 Where people have support needs related entirely to a physical disability, the Council will seek to provide them with support in their own home.

- 2.83 The Council does not have rank these groups in terms of the priority given to meeting their housing needs. However, we recognise that resources are limited, and it is unlikely to be possible to fully meet the needs of all groups. In this context, the Council will prioritise housing for the most vulnerable groups.

Preferred Policy DP8 – Creating and protecting a stock of housing with shared facilities or support facilities

The Council will support provision of housing with shared or support facilities provided the following criteria are met:

- there would not be a loss of permanent residential floorspace in Use Class C3;
- the accommodation will be affordable to the intended type of occupier;
- the development will provide an appropriate standard of facilities, support or care;
- the intended type of occupiers would have access to public transport, services and facilities appropriate to their specific needs;
- the development will take account of the intended type of occupiers' links to family and community support networks; and
- the development would not have an unacceptable impact on the locality, either individually or cumulatively with similar uses nearby.

The Council will resist the total or partial self-containment of housing with shared or support facilities, unless:

- no material change to the type of occupier is proposed;
- a reasonable standard of residential accommodation will be achieved;
- loss of bedspaces is kept to a minimum; and
- the accommodation will be continue to be affordable to the existing type of occupier.

The Council will resist the loss of housing with shared or support facilities, or a material change of use to serve a different type of occupier, unless:

- an appropriate replacement property is provided for the existing type of occupier, taking into account the criteria that apply to new provision; or
- the accommodation is no longer needed by the previous type of occupier; or
- the property no longer has potential to provide appropriate shared accommodation for the existing type of occupier or an alternative type of occupier.

Where the Council is satisfied that housing with shared or support facilities has been replaced, is no longer needed, or has no potential to provide for either the existing or an alternative type of occupier, we will expect conversion to permanent housing in Use Class C3, including an appropriate amount of affordable housing.

PROVISION OF HOUSING WITH SHARED FACILITIES OR SUPPORT

- 2.84 Overall, the Council considers that there is a growing need for housing with shared facilities or support facilities, which is consistent with the London Plan's housing target for the borough. There is considerable demand for additional student accommodation from private sector providers, and a continuing need for low cost accommodation for young people who cannot afford to buy or rent a self-contained flat. The Council is taking steps to reduce the reliance on such accommodation for homeless people and elderly people by improving opportunities to remain in, or to access, permanent housing, and by providing support for people to live in their own homes. However, Camden's strategy is dependent on restructuring its own stock of hostels and care homes, which is likely to involve an element of new provision.
- 2.85 Provision of housing with shared or support facilities should generally be geared towards a specific group of occupiers, taking into account the characteristics and needs of the group in question. The range of potential occupiers is very broad, as indicated by examples given in connection with Preferred Policy DP7 – **Groups using housing with shared facilities or support facilities**. The needs and impacts of the different types of occupiers are equally broad in range, in terms of provisions that may be needed on-site and in the wider area, and in terms of the social networks that apply. Consequently, it is not possible to design a speculative hostel block that could be managed to accommodate whichever demand arose after construction. Changes from one type of hostel to another are subject to development control where the character of the occupation changes and the impact changes. Where it considers that a change of occupier would cause harm to the amenity of occupiers or the area, the Council may use conditions to explicitly control the group or groups that occupy a development for housing with shared or support facilities.
- 2.86 Affordability is a critical factor affecting people's ability to access the kind of housing they need. Income levels widely vary within each group that potentially occupies housing with shared and support facilities – for example, many students are given financial help by their parents, and elderly people in rented accommodation have no housing capital. There are no targets for an affordable element within housing with shared or support facilities. However, affordability to intended occupiers will be considered, and may be controlled by legal agreements where this is appropriate to prevent potential occupiers putting extra pressure on other parts of the housing stock.
- 2.87 In most cases, Camden's standards for houses in multiple occupation will apply to housing with shared facilities or support. Houses in multiple occupation are defined more broadly under the Housing Act 2004 than they are in planning legislation. The standards set minimum sizes for bedrooms, bathrooms and kitchens, and the minimum facilities that should be provided for occupiers. The Council will have regard to these standards when considering proposals for shared accommodation, and will refer proposals to the Environmental Health team, which is responsible for licensing houses in multiple occupation.
- 2.88 The availability of facilities on-site or in the wider area will affect quality of life for all occupiers of all kinds of shared accommodation. Needs will vary widely, including washing machines or launderettes, shared kitchens or cafes, visiting nurses or neighbourhood surgeries, and day centres or social areas. The intended occupiers, the size of individual and shared rooms, and the location of the accommodation will influence the facilities needed and the ability of the locality to cope with a new housing with shared or support facilities. Access to social networks also profoundly affect quality of life, particularly for elderly people, people with mobility difficulties, and people linked to a locally based ethnic, cultural or religious groups. If shared accommodation is intended to house people drawn from within Camden, it should be located so they can maintain connections with family and community. The Council will resist proposals that are located where services and support networks cannot be secured, and use legal agreements where appropriate to secure the necessary social infrastructure on- and off-site.

- 2.89 In some parts of the borough there have been problems in the past where homeless hostels have been too large or clustered together, and have become a focus of anti-social behaviour. In general terms, housing with shared or support facilities remains housing, and should be compatible with residential and mixed-use areas. However, a concentration of large facilities all dealing with people with specific characteristics or difficulties, can unbalance the social mix in an area, create noise and disturbance and damage the amenity and quality of life for other local residents and visitors. The size and location of shared accommodation should be planned so that occupiers contribute to the social mix in the area and can be accepted as part of the community.

SELF CONTAINMENT

- 2.90 As indicated in paragraphs relating to new provision, alterations which involve a change in the group occupying the property can have implications for the amenity of future occupiers and the area. A material change to the group occupying the property will be judged firstly against criteria concerned with loss of shared accommodation (considering the existing occupiers) and with the criteria concerned with provision (considering future occupiers).
- 2.91 Self-containing units that previously formed part of accommodation with shared facilities or support will usually be development that is subject to planning control if it creates separate dwellings which can be occupied independently of the shared element. These changes can be beneficial if they improve the amenity and facilities available to occupiers, or otherwise enable the accommodation to better fit the needs of the occupiers. For example, provision of a range of self contained and supported accommodation can be helpful for homeless single people, so that they can prepare for a return to independent living, and can be appropriate for elderly people so that they can remain in the same community if their need for support and care increases.
- 2.92 However, the self-containment can be harmful if the flats created are not large enough to properly accommodate the self-contained facilities, if creating large flats reduces the number of people that can be housed in the property, or the self-contained units are no longer affordable to the type of occupier accommodated by the existing layout. These are factors that need to be weighed against each other and against any benefits of self-containment.
- 2.93 The standards that now apply to shared accommodation are more demanding than those previously in operation, which means that changes to layouts may be necessary to meet current licensing requirements. Unless there is considerable scope for extension, meeting current standards is likely to lead to some loss of bedspaces and reduction in the number of people who live in the property. This is an inevitable consequence of increasing standards, and is not subject to planning control unless an external change or the creation of separate dwellings is involved. Changes of layout that respond to licensing requirements in this way create financial pressure on private landlords, who need to meet the cost of layout change, may well have fewer tenants paying rent, and may well find that the improved facilities do not command higher rents.
- 2.94 Self containment is often a response by private landlords to the need to reconfigure accommodation in response to new standards, and wish to increase the value of each unit, whether for rent or sale. The Council sets different residential space standards for self-contained dwellings, which are given in our Camden Planning Guidance supplementary document. Space standards for self-contained units are higher, primarily reflecting the absence of any shared or communal spaces. The creation of self contained units that meet residential space standards is likely to reduce the number of people that can be accommodated in the property by 25% or more, is likely to significantly increase the cost of the accommodation to occupiers, and will usually lead to a change in the type of occupier. This type of self-containment will be judged against criteria concerned with loss of shared accommodation.
- 2.95 It may be possible to create self contained units that do not meet residential space standards within the context of a property that retains communal spaces, and a local area where services are available to make-up for lack of facilities in the home (e.g. launderettes). Our Camden

Planning Guidance supplementary document gives guidance on the circumstances in which this may be acceptable. Although a shortfall against residential space standards may be acceptable, the space available to each self-contained flat should significantly exceed standards for houses in multiple occupation. In considering whether such self-containment is appropriate, the Council will also take account of any submitted evidence on the cost of the works needed to enable the property to provide the appropriate standard of facilities and support for the existing type of occupier. Loss of bedspaces may be acceptable if appropriate standards cannot otherwise be met, if replacement spaces are available elsewhere, or if there is evidence of a reduced need for spaces.

- 2.96 Shared accommodation forms a significant stock of relatively cheap housing available to people who cannot afford to buy or rent a self-contained dwelling, for example young people and students. Affordability is the primary reason for many people to seek shared accommodation, and can remain a significant factor for people who are also meeting a specific support need. Self-containment will be resisted if the cost of the self-contained accommodation would not be affordable to the existing type of user, and affordability may be controlled by legal agreement.

LOSS

- 2.97 There is thought to have been a large reduction in the amount of shared accommodation in Camden in recent years, offset only by a modest increase in the amount of purpose-built student accommodation. Given the upwards pressure on housing costs in Camden in the decade up to 2008, shared accommodation is considered to be an important source of relatively low cost accommodation, which should be retained as a housing option in a balanced community. Specific forms of shared accommodation are also appropriate to provide for the support needs of certain groups, as set out in connection with Preferred Policy DP7 – **Groups using housing with shared facilities or support facilities**. Consequently, Camden generally seeks to prevent reductions in the stock of housing with shared or support facilities.
- 2.98 When considering the case for a loss of shared accommodation, two of the criteria we will assess are whether appropriate replacement accommodation has been provided, and whether there is now a need for shared accommodation to meet the needs of the existing type of occupier. If loss is considered acceptable under these two criteria, the Council will support conversion or redevelopment to provide an appropriate form of self-contained housing (in Use Class C3). Accepting a loss under these criteria allows a number of changes to the housing stock that are beneficial in terms of the mix of provision and meeting the needs of occupiers.
- 2.99 For public bodies such as the Council to adapt its stock of shared accommodation to meet current standards, it will often be necessary to make new provision in an alternative location. Provided the new accommodation is appropriately located for occupiers and meets their needs in terms of amenity, support and social infrastructure, conversion of the previous provision to self-contained housing will be an appropriate measure to fund the new accommodation, and will maintain or increase the borough's overall housing stock. As detailed in other parts of this section, it can also be difficult for private landlords to reconfigure houses in multiple occupation to meet current standards, and it may be acceptable for replacement provision to be made elsewhere, under the terms of a legal agreement. Again, the location of the replacement provision will need to be appropriate, and the Council will wish to consider whether the replacement might add to an existing concentration of shared accommodation that unbalances the area's social mix.
- 2.100 There are also circumstances where there is no longer a need for shared accommodation for a particular type of occupier. This is likely to happen where former occupiers are being provided with housing in a different way. Examples include hostels for homeless people, where the Council now focuses efforts on equipping and enabling homeless people to live independently in permanent housing, and hostel accommodation for nurses and key workers, which is now

provided primarily by Housing Associations as permanent housing which is low cost and self-contained. In allowing conversion of this type of accommodation, the Council will need to be satisfied that the needs of the former type of occupier have been met by sufficient and appropriate forms of housing.

- 2.101 A further criterion relates to the potential for the property to provide appropriate accommodation for the existing type of occupier. This potential will relate to the extent to which alterations are needed to meet current standards and expectations relating to the specific type of occupier, the adaptability of the property in terms of structure, layout, design and conservation, and the costs of the alterations necessary. The Council will also wish to consider whether there is any concentration of shared accommodation locally which has a negative impact on the area, and whether this might warrant making new provision elsewhere rather than seeking to adapt premises that do not meet current standards.
- 2.102 If housing with shared facilities or support no longer had potential to meet the needs of an existing occupier, the potential for it to remain as shared accommodation for an alternative user should be considered. Given the downwards pressure on the stock of residential accommodation with shared facilities, this further test is necessary where no replacement housing of any kind is being provided for the existing occupier. The appropriateness of the making the property available to a new user should be assessed with regard to the criteria that apply to new provision. Potential to adapt the property for an alternative type of user should be assessed in the same way as potential for the existing type of user, except that the alternative type of user will have different needs. If the loss of shared accommodation is considered acceptable under these two criteria, the Council will support conversion or redevelopment to provide an appropriate form of self-contained housing (in use class C3).
- 2.103 Where new self-contained housing in use class C3 is provided, whether through conversion or redevelopment of shared accommodation, the targets for affordable housing set out in the Core Strategy will apply. Preferred Policy DP6 relating to the loss of affordable housing will also apply where formal arrangements restricted the occupation and cost of the shared accommodation. For example, where the shared accommodation took the form of affordable hostel accommodation for nurses, unless replacement affordable accommodation for nurses has demonstrably been provided elsewhere, an equivalent amount should be re-provided as part or all of the new self-contained housing provision.

Key references/evidence

- Camden Housing Needs Study Update 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 3 – Housing

ALTERNATIVE OPTIONS

- 2.104 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Allow accommodation with shared facilities to be converted into self-contained dwellings without restriction

Whilst the Council considers that there are circumstances in which it may be appropriate for non-self contained housing to be replaced by self-contained housing (see preferred policy DP8), in general it is considered that non-self contained housing plays an important role in meeting specific forms of housing need, including for vulnerable people and those on low incomes, and thus should be protected. Protecting accommodation with shared facilities preformed more strongly in the Sustainability Appraisal, as it would ensure the retention of accommodation for people on lower incomes.

Allow a hostel to move from one type of occupier to another without restriction.

Consultation responses on issues and options highlighted the important difference between different forms of non-self contained accommodation. The Council considers that the important roles played by different forms of accommodation are not easily interchangeable, given the specific needs met by each. It is therefore essential that a move from one type of occupier to another should only be permitted either where there is no longer a need for shared accommodation to meet the needs of the existing type of occupier; or where appropriate replacement accommodation has been provided.

Gypsies and travellers

2.105 Core Strategy Preferred Option CS4 aims to provide for the housing needs and accommodation types of different groups, including gypsies and travellers. Preferred Policy DP9 provides more detail on our approach to providing sites to accommodate gypsies and travellers.

Preferred Policy DP9 – Gypsies and travellers

The Council will protect existing lawful sites, plots and pitches for gypsies and travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations.

The Council will seek to identify sufficient additional plots for households of travelling showpeople and for gypsies and travellers in accordance with the findings of the London Gypsy and Traveller Accommodation Needs Assessment.

New sites, plots and/or pitches for gypsies and travellers and travelling showpeople will be expected to:

- provide a satisfactory layout and facilities in terms of pitches, hardstandings, parking, turning space, amenity blocks, open space and play areas;
- be capable of connection to energy, water and sewage infrastructure;
- be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;

- provide safe access to and from the main road network;
- not cause harm residential amenity or the operational efficiency of nearby properties;
- not cause harm to open spaces, Metropolitan Open Land (MOL), Sites of Nature Conservation Importance (SNCIs), woodland, water courses etc, and
- incorporate appropriate landscaping to prevent harm to the character and appearance of the surrounding area.

- 2.106 Gypsies and travellers are among the most disadvantaged sectors of society in terms of their accommodation. The Council recognises the needs of gypsies and travellers within the borough, many of whom have established local connections and have developed links with local services. There are 5 gypsies and travellers pitches in Camden (at Carol Street and Castlehaven Road). There is a single site 4 households of travelling show people (the North Fairground Site at the Vale of Health). The Council will protect these sites from change to alternative uses unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations.
- 2.107 The London Gypsy and Traveller Accommodation Needs Assessment calculated that to meet the needs of gypsies and travellers and travelling showpeople to 2017, there is a need for a minimum of 2 and a maximum of 5 additional pitches for gypsies and travellers and for 2 plots for travelling showpeople in the borough. The Council will seek to identify sites to meet this need through the Camden Sites Allocations document.
- 2.108 We will aim to ensure that new sites/pitches are both adequate and appropriate to the needs of the gypsy and traveller communities and integrated with adjoining communities. Proposals will also be expected to satisfy all other relevant development plan policies, including Preferred Policy DP3 – **Addressing the needs of specific groups**, DP14 – **Walking, cycling and public transport**, DP15 – **Making the best use of highways and street spaces**, Preferred Policy DP24 – **Managing the impact of development on occupiers and neighbours**, and Core Strategy Preferred Approach CS9 – **Improving and protecting our parks and open spaces and encouraging biodiversity**.
- 2.109 The Council will use the definition of gypsies and travellers as defined in Circular 01/2006 “Planning for Gypsies and Traveller Caravan Sites” and the definition of travelling showpeople as defined in Circular 22/91 “Travelling Showpeople”, which set out national policy on site provision for these groups.

Key references/evidence

- London Gypsy and Traveller Accommodation Needs Assessment 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites
- Circular 22/91 – Travelling Showpeople

ALTERNATIVE OPTIONS

2.110 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Do not protect existing, or provide new, accommodation for Gypsies and Travellers	This approach would be contrary to the London Plan and Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites. The London Gypsy and Traveller Accommodation Needs Assessment indicated a need for net additional accommodation in the borough. Allowing the loss of existing pitches, or not providing for additional pitches would fail to meet identified needs.

3 Promoting a sustainable Camden and tackling climate change

- 3.1 Promoting a sustainable Camden and tackling climate change is a key element of Camden's Community Strategy and Core Strategy. The borough's highly built-up, inner urban environment means that we face specific environmental issues such as poor air quality, surface water flooding and dealing with our waste. Also, the measures we can take to reduce the impacts of climate change and adapt to its effects need to consider and be appropriate to the borough's dense and historic character and sensitive environments.
- 3.2 Camden's preferred planning strategy for promoting a sustainable Camden and tackling climate change is set out in our Core Strategy Preferred Approach. This seeks to:
- make Camden a low carbon borough and tackle climate change through:
 - > expecting the highest feasible environmental standards and sustainable design;
 - > promoting decentralised energy and heating networks;
 - > reducing water consumption and limiting the potential for flooding; and
 - > adapting to climate change (Preferred Approach CS5);
 - manage and reduce our waste to make Camden a low waste borough (Preferred Approach CS6); and
 - promote sustainable transport that reduces the environmental impact of travel in Camden, for example through:
 - > reducing the need to travel and promoting travel choice;
 - > promoting walking, cycling and public transport use and sustainable movement of goods;
 - > promoting transport facilities, services and street space arrangements usable by all;
 - > limiting the availability of private parking (Preferred Approach CS7).
- 3.3 This section of Camden's Development Policies helps to implement the approach in Core Strategy by setting out detailed planning policies that focus on sustainable design and construction, tackling climate change and detailed transport matters. Our detailed approach to waste will be contained in the North London Waste Plan which we are preparing in conjunction with our partner boroughs in the North London Waste Authority area. This will identify sites to deal with our waste and contain detailed policies for waste facilities.
- 3.4 Our overall approach to the social elements of sustainability are covered in the Core Strategy and Development Policies sections on **Improving the Quality of Life of Camden's Communities** and the economic aspects in the sections on **Securing a strong economy that includes everybody**. However, how we make Camden more sustainable is an overarching issue that runs through all of our Local Development Framework documents.

WHAT YOU TOLD US

- 3.5 The main points raised on a sustainable Camden and tackling climate change during consultation on issues and options for Camden's Development Policies are summarised below.
- Most respondents on the issue felt that sustainability and climate change considerations are important but should be given equal weighting, not override, other important issues, e.g. design and housing
 - Most respondents stated that the BREEAM and the Code of Sustainable Homes assessments are useful tools to assess the sustainability of a development. However, Private sector respondents felt that existing targets are often difficult to achieve and resisted increased targets

- There was no consensus on whether developments should re-use and recycle materials from other development sites
- A number of respondents commented that achieving a target of 20% of a site's energy from renewable sources would be challenging, particularly if the use of biomass is restricted. There was no consensus on whether biomass should be used in Camden.
- There was wide support for developments being designed to take into account of the potential effects of climate change.
- There was general support for sustainable transport measures.
- There was no consensus on parking and car-free housing.

3.6 The Development Policies Issues and Options Consultation Statement contains a summary of the comments we received on this matter and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on promoting a sustainable Camden during consultation on issues and options for the Core Strategy and the Council's response.

Promoting sustainable design and construction

3.7 Promoting a sustainable Camden is a key element of our Core Strategy. Core Strategy preferred approach CS5 – **Tackling climate change through promoting higher environmental standards** sets out part of our overall approach to tackling climate change, which includes promoting higher environmental standards in design and construction. Development policy DP10 contributes towards delivering the strategy in CS5 by providing detail of the sustainability standards we will expect development to meet. Preferred policy DP10 should be read in conjunction with DP11 – **Energy efficiency and renewable energy** and DP12 – **Water**.

Preferred Policy DP10 – Promoting sustainable design and construction

The Council will promote sustainable design and construction by:

- expecting schemes to be designed with regard to sustainable development principles including – location, density, mix of uses, possibility for re-use, design, choice of materials and provision of infrastructure and services of the building to meet sustainable design principles. (A full list of measures is set out in paragraph XX below.)
- adopting the government target that all new build housing will be zero carbon by 2016 (Code Level 6), along with the stepped targets of Code 3 by 2010 and Code 4 by 2013, and expect a similar level of sustainable design and construction from commercial developments, with the requirement that they are zero carbon from 2019;
- requiring new build housing to achieve 50% of the credits in the categories of Energy, Water and Materials under the Code for Sustainable Homes;
- requiring developments of 500sqm of floorspace or 5 or more dwellings to achieve 'excellent' in BREEAM or EcoHomes assessments and achieve 60% of the credits in Energy, 60% of the credits in Water and 50% in Materials. These targets will increase to a rating of 'outstanding', and energy and water targets will rise to 70%, in 2016.

- expecting designs to enable the installation of green/brown roofs and green walls wherever suitable;
- ensuring all developments have considered and implemented any climate change adaptation measures, including summer shading and planting to reduce the urban heat island effect and provide a cool refuge for occupiers, limiting run-off to prevent flooding, reducing water consumption, reducing air pollution and not locating vulnerable uses in basements in flood prone areas

3.8 The construction and occupation of buildings are major consumers of resources and can produce large quantities of waste. The choice of building location, its mix of uses, design, mechanical services and materials can all have a major impact on how efficient premises are to build and occupy. The Council will expect all schemes to consider the development principles identified in policy DP10 from the start of the design process. Developments of 5 or more dwellings or 500sqm of floorspace should address sustainable development principles and the BREEAM/EcoHomes/Code for Sustainable Homes standards above in their Design and Access statements. When justifying the chosen design with regards to sustainability the following points should be covered:

- the layout of uses;
- location, size and depth of windows;
- level of insulation;
- choice of materials, including re-use and recycled content;
- limiting excessive solar gain;
- the need for artificial lighting;
- the use of natural ventilation;
- efficient heating, cooling and lighting systems;
- the source of energy used;
- design for and inclusion of renewable energy technology, including micro-renewable technologies;
- impact on existing renewable and low carbon technologies in the area;
- floorplates size/depth;
- floor to ceiling heights;
- shading structures;
- efficient water use;
- re-use of water;
- sustainable urban drainage, including provision of a green/brown roof;
- enhancement of/provision for biodiversity;
- providing adequate storage space for recyclable material, composting where possible and bicycle storage;
- measures to adapt to climate change (see below);
- whether elements can be used as educational tools, for example visible meters;
- on-going management and review.

- 3.9 All proposals for demolition and reconstruction should be fully justified in terms of the use of resources and energy, and the efficiency of the existing and proposed buildings.
- 3.10 The Council's Camden Planning Guidance supplementary document contains detailed guidance on further elements of sustainable design and construction.
- 3.11 BREEAM (Building Research Establishment Environmental Assessment Method) and EcoHomes assessments, which apply to non-residential developments and residential development arising from conversions and changes of use respectively, are tools which enable us to assess the environmental sustainability of developments. The government has also set environmental targets in **Building a Greener Future. Towards Zero Carbon** which apply all new dwellings. The Code for Sustainable Homes is the tool used to assessed these targets.
- 3.12 These assessment tools contain several categories, e.g. Energy, Water, Materials, Waste, Surface Water, Management, Transport, Land use, Ecology, Health and Well-being and Pollution. Each category contains credits that can be obtained to achieve the overall score required. For the Code for Sustainable Homes and BREEAM 2008 certain credits are compulsory.
- 3.13 For developments in Camden it is generally easy to obtain the transport credits outlined in BREEAM and EcoHomes as the borough is well served by public transport and services. In addition, the credits in the management category are reasonably easy to obtain. Therefore we have set sub-targets within the categories of Energy, Water and Materials to ensure developments have fully addressed the main issues of sustainable design and construction and climate change. We will expect developments to achieve any higher energy/carbon reduction, water and sustainability targets set by the government in the future.
- 3.14 Green and brown roofs and green walls can play important roles in achieving a sustainable development. They can retain rainfall and slow its movement, provide additional insulation, provide valuable habitat to promote biodiversity, provide opportunities for growing food, reduce the heating up of buildings and the wider city and provide valuable amenity space. They should be designed to enable the benefits that are most suitable for the site. This will include ensuring a sufficient soil depth is provided and selecting the correct substrate and vegetation. Green walls can provide additional insulation, habitat and an improved micro-climate as well as reducing the overall heating of the city. The design of green walls should ensure sufficient irrigation for plants without the need for excessive energy consumption for pumping water.
- 3.15 Green and brown roofs can be easily incorporated into a flat roof. Therefore it is important that the inclusion of a flat roof is considered at the initial design stage. Flat roofs on the street elevation of properties may not be appropriate everywhere in the borough, for example in historic areas, but it may be possible to include them where they would not be visible.
- 3.16 It is predicted that in the future we will experience warmer and wetter winters and hotter and drier summers. These changes could lead to more intense rainfall events and local flooding, subsidence due to increased shrinking and expansion of the Camden's clay base, poorer air quality, increased summer electricity demand and a hotter micro-climate due to increased demand for cooling. Developments should include measures to enable occupants to cope with these climatic changes. Measures to consider include natural ventilation, summer shading, the planting of trees and vegetation, openable windows, provision of external space, pervious surfaces to enable water to infiltrate the ground to reduce clay shrinking and limit the incidence of flooding.
- 3.17 The provision of air conditioning can result in an increase in the local external air temperature due to the heat expelled by this equipment. Where air conditioning cannot be avoided, we will expect the inclusion of some form of external cooling to counter the heat expelled by the air conditioning units. The external cooling can be the inclusion of a green roof, a green wall and

tree planting. Details regarding plant equipment and noise can be found in DP25 – **Noise and vibration**.

- 3.18 To limit the potential effects of extreme rainfall that is predicted to occur as the result of climate change, development should:
- include sustainable urban drainage systems, which attempt to mimic natural drainage systems, to improve water quality and minimise the potential for flooding,
 - carefully design the ground and basement levels of buildings to limit the effects of any flooding and,
 - in areas known to be susceptible to surface water flooding, limit the use of basements to reduce the potential for loss of life and damage to equipment. Further details on basement can be found in DP20 – **Basements and lightwells**.
- 3.19 Predicted climatic changes will also have an effect on air quality and biodiversity in the borough. Our approach to improving Camden’s air quality is set out in Core Strategy Preferred Approach CS14 – **Improving and protecting amenity** and Development Policy DP26 – **Clear Zones**. Policies to preserve and enhance biodiversity are included in Core Strategy Preferred Approach CS9 – **Improving and protecting our parks and open spaces and encouraging biodiversity**.

Key references/evidence

- Towards a Sustainable Camden. Camden’ Environmental Sustainability Delivery Plan 2008-2012
- Camden Sustainability Task Force Report on Energy and Energy Efficiency; 2007
- Planning Policy Statement: Planning and Climate Change – Supplement to Planning Policy Statement 1; CLG; 2007
- Building A Greener Future; CLG; 2006
- Sustainable Design and Construction – Supplementary Planning Guidance; Mayor of London; 2006
- Building A Brighter Future. A Guide to Low Carbon Building Design; Carbon Trust; 2005
- Building Research Establishment Environmental Assessment Method (BREEAM); Building Research Establishment; 2006 and 2008

ALTERNATIVE OPTIONS

- 3.20 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Do not use BREEAM assessments/the Code for Sustainable Homes as tools to measure overall sustainability	The use of sustainability assessment tools is recognised as appropriate by the government. From 2010, Level 3 of the Code for Sustainable Homes will be a national requirement as set out in Building A Greener Future . This option did not perform as well as the Council’s preferred option with regards to environmental sustainability in the sustainability appraisal.

Alternative option	Reason option was not chosen
Relax, or do not raise over time, the sustainability standards required, including those for Energy, Water and Materials	National requirements for the Code for Sustainable Homes will increase over time, as set out in Building A Greener Future. The Council's preferred approach is consistent with this. In addition, the alternative option did not perform as well as the Council's preferred option with regards to environmental sustainability in the Sustainability Appraisal.
Raise or maintain the current thresholds for BREEAM assessments and Code for Sustainable Homes for schemes of more than 1000m ² and/or 5 or more homes	Raising or maintain the current threshold would mean fewer developments would be expected to meet higher environmental standards in Camden than under the Council's preferred approach. This would affect our ability to secure sustainable development, as promoted by government guidance and the London Plan. In addition, the alternative option performed less well than Council's preferred option with regards to environmental sustainability in the Sustainability Appraisal.
Do not require planning applications to demonstrate how their design will reduce the need for mechanical heating, cooling and lighting for the lifetime of the development	This approach would not enable the Council to ensure that a high level of energy efficiency is secured in developments in accordance with PPS1 and the London Plan, which support sustainable development and reduction in energy use. In addition, this approach did not perform as well as the Council's preferred approach in the Sustainability Appraisal.

Energy efficiency and renewable energy

- 3.21 Our buildings are the largest consumers of energy and therefore the largest emitters of carbon dioxide. Therefore it is important that buildings are designed to enable occupiers to be as energy efficient as possible. Core Strategy Preferred Approach CS5 – **Tackling climate change through promoting higher environmental standards** sets out part of our overall approach to tackling climate change, which includes through reducing our carbon emissions by 60% by 2050. It sets out our approach to reducing carbon emissions from the construction and occupation of buildings by ensuring developments use less energy, make use of energy from efficient sources and use renewable energy.
- 3.22 Preferred policy DP11 contributes to the implementation of the strategy set out in CS5 by outlining further energy measures that should be incorporated into developments. Preferred policy DP11 should be read in conjunction with preferred policies DP10 – **Sustainable design and construction** and DP12 – **Water**. The Council's Camden Planning Guidance supplementary document contains detailed guidance on further elements of energy efficiency, efficient energy supply and renewable energy.

Preferred Policy DP11 – Energy efficiency and renewable energy

The Council will seek to tackle climate change through reducing energy consumption and carbon emissions by:

- requiring all major developments with an appropriate mix of uses or located within 500m of a use with a large heating load to:
 - > assess the feasibility of installing a combined heat and power (CHP) system where the energy is to be used on-site or exported to nearby developments, and
 - > implement such an energy system where feasible;
- requiring major developments to reduce the site's carbon emissions by 20% through on-site renewable technology;
- seeking a contribution towards the installation of an area wide CHP, decentralised energy network or other carbon reduction measures within the borough, where the Council is satisfied that a development has reduced its energy demand as low as practical and feasible and cannot reduce 20% of its carbon emissions from on-site renewable technology;
- promoting on-site renewable energy sources.

- 3.23 The development principles outlined in preferred policy DP10 – **Promoting sustainable design and construction** should be the first considerations when developing a scheme. Once these have been addressed the potential to include a combined heat and power (CHP) system for the site, or one that includes nearby sites, should be assessed. Developments with a high heating load include those that use a large amount of space heating and hot water for long periods of the day and night. Uses likely to meet this profile include hospitals, hotels, tourist hostels, student accommodation, swimming pools and laundries. A mix of uses will provide a range of times this heat is needed, enabling the CHP system to operate for longer hours. Camden's Core Strategy identifies the areas where decentralised energy networks are most likely to be feasible. Within these areas, where a development does not include its own CHP or does not link into an existing decentralised network, the proposal will be expected to pay a contribution towards rolling out the decentralised network.
- 3.24 The use of on-site renewable energy sources helps to reduce carbon emissions and can reduce reliance on grid electricity and mains gas. The generation of 20% of a site's energy from on-site renewable sources will contribute to achieving the Council's aim to reduce our overall per capita carbon emissions. On-site renewable energy sources include solar hot water, photovoltaics, efficient ground/water/air source heat and cooling pumps, and heating and cooling through bore holes. Where suitable, developments should consider designing roofs to face south to take advantage of energy from the sun. Also, in areas close to the Regent's Canal strong consideration should be given to heating and cooling from the Canal. (This would be subject to a license from British Waterways.) As Camden suffers from poor air quality, we will only allow biomass as the renewable energy contribution once all other options have been ruled out. Where biomass is allowed, the least polluting boilers will be required as well as air quality mitigation measures. All systems should be metered to enable monitoring and maintained to ensure they operate at their optimum capacity.
- 3.25 Where major developments can justify to the satisfaction of the Council that they cannot reduce 20% of the site's energy requirements from on-site renewable energy technologies, we will expect them to make an appropriate contribution towards large scale energy saving or energy generation measures such as large scale CHP systems. Where a development provides a

decentralised energy network powered by combined heat and power beyond their site boundaries, but cannot generate 20% of their energy from on-site renewable technology they will not be expected make such a contribution.

3.26 Smaller and existing developments can also make a contribution towards cutting energy consumption and generating a proportion of energy on site. For example, one 4sqm solar thermal panel can generate most of a households hot water needs over the summer. We will encourage the inclusion of micro renewable technology in small developments, where practicable, to ensure all development within the borough helps to reduce carbon emissions.

Key references/evidence

- Towards a Sustainable Camden. Camden’ Environmental Sustainability Delivery Plan 2008-2012
- Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007
- Camden Sustainability Task Force Report on Energy and Energy Efficiency; 2007
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Action Today to Protect Tomorrow – Mayor’s Climate Change Action Plan; 2007
- Planning Policy Statement: Planning and Climate Change – Supplement to Planning Policy Statement 1; CLG; 2007
- Planning Policy Statement (PPS) 22: Renewable energy; ODPM; 2004
- Community Energy: Urban Planning for a Low Carbon Future by the Combined Heat and Power Association and the Town and Country Association

ALTERNATIVE OPTIONS

3.27 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Do not limit the acceptability of biomass as a renewable energy contribution.	This approach would be contrary to the London Plan and Circular 01/2006 – Planning for Gypsies and Traveller Caravan Sites. The London Gypsy and Traveller Accommodation Needs Assessment indicated a need for net additional accommodation in the borough. Allowing the loss of existing pitches, or not providing for additional pitches would fail to meet identified needs.The government’s supplement to PPS1 and the London Plan promote renewable energy sources but do not limit the type of technology. Burning biomass releases pollutants into the air and given that Camden has particularly poor air quality that does not meet national air quality standards, the Council does not encourage the use of biomass in the borough. Consideration of air quality is consistent with government guidance in PPS23 and the London Plan.

Alternative option

Reason option was not chosen

Have a stepped renewable energy target, depending on the size of development.

The Council's preferred approach is to seek developments to be sustainable as possible. This is considered to be consistent with the London Plan and government guidance. We therefore consider that all major development should aim to meet the 20% target.

This is in line with the London Plan which requires major developments to reduce their carbon emissions by 20% from on-site renewables.

Do not expect developments that have justified why they cannot meet the on-site renewable energy target on-site to make a carbon reduction contribution in another way

Reducing carbon emissions is an important aim of Camden's Community Strategy, government guidance (e.g. the Supplement to PPS1) and the London Plan. It is therefore considered reasonable to expect schemes that cannot fully contribute on-site to contribute in another way. In addition, the Council's preferred option performed better than this alternative option in the Sustainability Appraisal.

Water

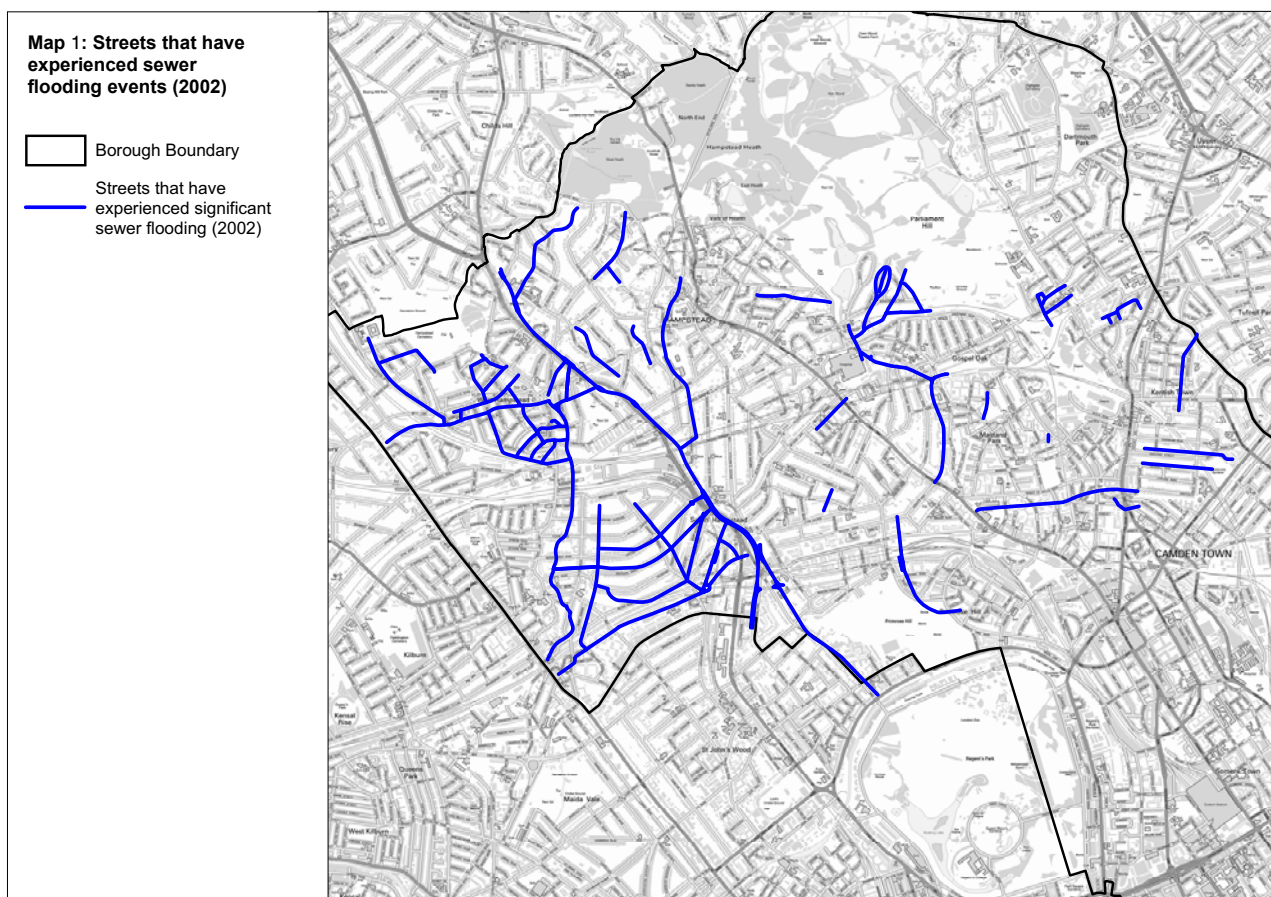
- 3.28 The built environment plays a large role in the way water is consumed, distributed and disposed of. Development has an impact on the quality of water, through the way it is used within a building and what material it picks up running across a site. Also the location of development can have an impact on local and downstream flooding. Core Strategy Preferred Approach CS5 – **Tackling climate change through promoting higher environmental standards** sets out our overall approach to tackling climate change which includes reducing our water consumption and reducing the risk of surface water flooding.
- 3.29 Preferred policy DP12 contributes to the implementation of the strategy set out in CS5 by seeking to reduce water consumption and limit the amount of waste water entering the sewer, thereby reducing the risk of flooding during peak rain events. Preferred policy DP12 should be read in conjunction with preferred policy DP10 – **Sustainable design and construction** and DP11 – **Energy Efficiency and Renewable Energy**.

Preferred Policy DP12 – Water

The Council will reduce water consumption, the pressure on the sewer network and surface water flooding by:

- requiring developments to limit the amount and rate of run-off and waste water entering the combined sewer by capturing, retaining and re-using surface water and grey water on-site, including through sustainable urban drainage methods;
- expecting development to aim for a 'greenfield' run-off rate;
- reducing the pressure placed on the combined sewer network in the areas shown on Map 1;
- encouraging the provision of attractive water features.

- 3.30 The amount of water we dispose of is linked to how much water we use. This is because we only consume a small proportion of water that enters a building. Most of the water we use is for washing and flushing the toilet and therefore leaves the site again. The pumping and cleaning of water to drinking level consumes energy. In order to save energy and drinking water, water should be consumed efficiently and where possible treated and consumed close to source.
- 3.31 Developments should first be designed to be water efficient in accordance with policy DP10 – **Sustainable Design and Construction**; this includes installing water efficient appliances. Developments should also be designed to capture and use water on-site. We will assess the performance of water-saving measures against the Water category in BREEAM, EcoHomes or the Code for Sustainable Homes assessments (see DP10).
- 3.32 ‘Rainwater harvesting’ captures water falling on a site, such as roofs and impervious paved areas, and uses it for irrigation, flushing of toilets and, where the water is clean enough, clothes washing. These systems can be designed in conjunction with surface water flood mitigation measures such as on-site detention tanks. Rainwater harvesting saves energy and the use of water treated to drinking level. We will require all new build developments to include a rainwater harvesting system, unless a green or brown roof and other permeable surfaces included will hold at least 90% of the water falling on the site. The size of the rainwater harvesting system should take into account annual rain yield, consumption rates and the need for on-site detention to prevent flooding. Information on sizing based on annual yield and consumption rates can be obtained from the Environment Agency.
- 3.33 Grey water use captures water from sinks, showers and washing machines for its re-use. The capture of rainwater can also be incorporated into a grey water system. Major developments and high water use developments, such as hotels, hostels and student housing, should include a grey water harvesting system. Where such a system is not feasible or practical, developers must demonstrate to the Council’s satisfaction that this is the case.
- 3.34 The combined surface water and sewer network within Camden is particularly old and must cope with increased amount of foul water due to increased population size and density, as well as more workers and visitors. The combined sewer network must also cope with increased run-off due to greater use of impervious surfaces across Camden and London. Rainwater harvesting and grey water re-use reduce and delay the amount of waste water leaving a site and being taken away by the combined sewer. Given Camden’s growing population, it is important to reduce the amount of run-off entering the combined sewer to ensure it can cope with both forms of waste water. All sites over one hectare are required to produce a site specific Flood Risk Assessment which focuses on the management of surface water run-off which determines the amount of impermeable surfaces resulting from the development and the potential for in increased flood risk both on site and elsewhere within the catchment. A ‘greenfield’ run-off rate is one that reflects the natural rate of run-off from a site before it was developed. We will expect developments to aim for such a rate of run-off.
- 3.35 The area shown on Map 1 is known to suffer from local surface water flooding. It is especially important for development within this area to limit surface water run-off and not to place additional pressure on adjoining sites and on the combined sewer system. Where a site is known to have a particular drainage issue, development should improve the existing drainage infrastructure. Within the areas shown on Map 1 we will expect water infrastructure to be designed to cope with a 1 in 50 rainfall event.
- 3.36 The Council’s Camden Planning Guidance supplementary document contains further information on water and sustainable design and construction.



Key references/evidence

- Camden Sustainability Task Force Report on Food, Biodiversity and Water; 2008
- Towards a Sustainable Camden – Camden's Environmental Sustainability Delivery Plan 2008-2012
- Sustainable Design and Construction Supplementary Planning Guidance; Mayor of London; 2006
- Planning Policy Statement 25 – Development and Flood Risk; CLG, 2006
- North London Strategic Flood Risk Assessment; Mouchel; 2008
- Greywater: An information guide; Environment Agency; 2008
- Harvesting Rainwater for domestic uses; Environment Agency; 2008

ALTERNATIVE OPTIONS

- 3.37 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. See also alternative options for DP10 – **Sustainable Design and Construction** above. Please see the Development Policies Issues and Options Consultation Statement for a detailed summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not require developments to include rain water capture and/or sustainable urban drainage measures

This approach would not be consistent with PPS25, which states that local authorities should seek to reduce flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS), or the London Plan, which also promotes sustainable drainage. Certain areas of Camden suffer from surface water flooding and sustainable drainage measures are particularly important in these locations. The alternative approach did not perform as well as the Council's preferred option in the Sustainability Appraisal.

Development and transport implications

- 3.38 Camden's Core Strategy aims to promote efficient transport with a low environmental impact. Major elements of this strategy include promoting sustainable forms of transport, limiting the availability of car parking, and managing the existing network to provide for all transport users and particularly for sustainable forms. This Development Policies document includes six sections on transport:
- development and transport implications;
 - walking, cycling and public transport;
 - making the best use of highways and street spaces;
 - parking and the impact of development;
 - parking standards and limiting the availability of car-parking;
 - movement of goods.
- 3.39 Almost every development that affects the transport network will have impacts in more than one of these areas. For example, development that generates a need for public transport is likely to involve movement of goods. Addition or removal of car parking will usually need assessment in terms of use of sustainable forms of transport and in terms of its impact on highways. Consequently, the five sections are designed to be applied together. Reading one section alone will not give all the policy criteria relevant to assessing a proposal.
- 3.40 Our Local Development Framework will guide how Camden considers development proposals, and will also provide some guidance on the Council's own transport management activities. However, it may also be necessary to refer to a number of other key Council documents that guide Camden's transport activities – particularly the Local Implementation Plan, the Green Transport Strategy, the Camden Walking Plan, the Camden Cycling Plan Review, the Parking and Enforcement Plan, the Road Network Management Plan and the Streetscape Design Manual.

Preferred Policy DP13 – Development and transport implications

The Council will seek to ensure that development is properly integrated with the transport network. We will resist development that fails to assess and address any need for the following:

- movements to, from and within the site;
- links to existing transport networks;
- additional transport capacity off-site (such as improved infrastructure and services) where existing or committed capacity cannot meet additional need generated by the development;
- safe pick-up, drop-off and waiting areas for taxis, private cars and coaches where this activity is likely to be associated with the development.

- 3.41 Development proposals will need to be accompanied by an indication of their implications for use of the transport network unless they involve minimal amounts of floorspace. It will often be possible to address basic issues (movement on and around the site and linkages to transport networks) through the Design and Access Statement, which is a nationally required submission with most planning applications. Provision of drop-off points and enhancement of off-site capacity will usually only arise from developments that generate significant travel demand, and for these a formal Transport Assessment will be required to indicate the measures needed in association with development.
- 3.42 Some developments may need to be designed to accommodate public routes across the site, for example because they straddle an existing road or footpath. Other large sites may benefit from a permeable layout that creates new public routes and ensures that internal destinations are accessible. Developments should generally be designed to accommodate movements into and across the site rather than closed blocks with a single entrance/ exit point.
- 3.43 Creating motor vehicle access from the road network is not sufficient to integrate a development with walking, cycling and public transport networks. Appropriate connections to the networks may not be available at the site boundary, and the impact of a development may extend some distance from the site boundary, so attention to off-site movements is required. To ensure integration into wider networks, the development is expected to contribute to off-site measures where existing connections are not appropriate to serve a development (for example because of conflict between pedestrians and cars or service vehicles). The networks that are relevant and the measures that may be needed are considered further through Preferred Policy DP14 – Walking, cycling and public transport and Preferred Policy DP15 – **Making the best use of highways and street spaces.**
- 3.44 Developments with significant travel demand will have to be assessed in terms of whether transport networks can absorb the additional travel. The Council's strategy is to promote sustainable travel, and there is little potential to add to road capacity in Camden, so the capacity of public transport systems will be a critical part of the assessment. The assessment should take account of planned transport provision where this has fully secured funding and a firm start-date. It should also consider the cumulative impact of other proposals relying on the same infrastructure and services. Where existing and proposed public transport provision will not have sufficient capacity to serve the development, the Council will expect to secure funding towards enhancement of public transport capacity. The enhancements involved are considered further in connection with Preferred Policy DP14 – **Walking, cycling and public transport.**
- 3.45 Large numbers of taxis, minicabs and coaches queuing, waiting or parking on street can be

visually intrusive, harm the safety of passengers and other road-users, and cause nuisance from noise, pollution and congestion. However, they are vital resources for certain journeys. Taxis and minicabs are often the only travel option available to people without access to a car, disabled people, and people carrying heavy baggage or travelling late at night. Coaches provide low-cost transport services and relatively sustainable long distance travel for tourists.

- 3.46 There is demand for cab and coach picking-up, dropping-off down and waiting at a number of locations in Camden, such as transport interchanges, shopping areas, hotels and tourist attractions. At some of these (notably interchanges and shopping areas), pick-up and drop-off by private car is also in demand. Development that is likely to attract significant numbers of taxis, minicabs and coaches should be designed with appropriate passenger pick-up and drop-off points, each providing appropriate spaces and management arrangements to prevent harm to highway safety, pedestrian movements or amenity. Facilities should allow people with disabilities to get safely in and out of taxis and minicabs. Where possible, developments should include the pick-up and drop-off facilities they need on-site, but off-site arrangements will sometimes be necessary. Developers will be expected to assess fully the impact of vehicle movements associated with pick-up, drop-off and waiting.

SIGNIFICANT TRAVEL DEMAND AND TRANSPORT ASSESSMENTS

- 3.47 Two Core Strategy criteria are triggered by developments that generate significant travel demand, as set out in CS1 – **Distribution of growth** and CS7 – **Reducing the environmental impact of travel**:
- the development is guided to locations that are highly accessible by public transport, and Camden will expect the location of the proposal to be justified in terms of the sequential test; and
 - a formal Transport Assessment is expected.
- 3.48 The following table gives guidance on the scale of development that is likely to generate a significant travel demand. The thresholds given in connection with **Distribution of growth and Transport Assessments** is not the same in each case. Each threshold reflects the nature and characteristics of individual land uses. Homes, industrial space and warehousing are not intensive destinations for passenger transport and can have large floorspace requirements, so directing all such development to Central London and town centres would not be appropriate. Residential institutions and non-residential institutions are broad land-use groups, and include some uses with intensive movement patterns. For example, movements associated with hospitals, schools and places of worship will usually warrant a formal Transport Assessment to consider the need for mitigating measures such as Travel Plans.
- 3.49 The table gives guidance using floorspace figures for ease of use, but these are based on anticipated movements of people and vehicles. The movement criteria on which the floorspace figures are based are set out in our Camden Planning Guidance supplementary document, and include the number of journeys during the peak period, the number of journeys in any hour, the number of heavy goods vehicle movements and the number of coach movements. A Transport Assessment may be required for a development that exceeds any journey or movement criterion even if the development falls below the guideline floorspace given in the table.
- 3.50 Where a proposal involves a land-use or mix that is not in the table, the following guidance applies:
- both thresholds are triggered by a mixed-use development of 1,000 sq m gross floor area or more if it contains A1, A2, A3, C1 or D2 uses;
 - both thresholds are triggered by a mixed-use development of 2,500 sq m that gross floor area or more if it does not contain these uses, but contains B1 uses;

- for uses that are not in a use class, the threshold is should be selected on the basis of a class in the table with similar transport characteristics;
- for other mixes, and for uses that do not have a comparable class in the table, the movement criteria set out in our Camden Planning Guidance supplementary document will be used to determine whether travel demand is significant.

3.51 Applicants should discuss the scope of the Transport Assessment with the Council prior to submission for advice on the most appropriate methods for deriving estimates such as the number of trips generated. Written guidance is available from a number of sources including **Transport Assessment Best Practice** (Transport for London 2006) and our Camden Planning Guidance supplementary document. In some circumstances, a Transport Assessment should be accompanied by an acoustic report and/or an air quality assessment. Preferred Policy DP25 – **Noise and Vibration** includes information on noise levels that are not considered acceptable, and Core Strategy Preferred Approach CS14 – **Improving and protecting amenity** gives more information on air quality issues. Further guidance is included in our Camden Planning Guidance supplementary document.

Land Use	Guideline floorspace threshold for Distribution of growth (CS1, CS7)	Guideline floorspace threshold for Transport Assessment (CS7)
A1 – Shops	1,000 sq m GFA or more	1,000 sq m GFA or more
A2 – Financial and Professional Services		
A3 – Restaurants and cafés		
A4 – Drinking establishments		
A5 – Hot food takeaway		
B1 – Business	2,500 sq m GFA or more	2,500 sq m GFA or more
B2 – General Industry	Not applicable	2,500 sq m GFA or more
B8 – Storage and Distribution		
C1 – Hotels	1,000 sq m GFA or more	50 beds or more, estimated at 1,000 sq m GFA or more
C2 – Residential Institutions	2,500 sq m GFA or more	Always sought where justified by travel demand or transport conditions
C3 – Dwellings	Not applicable	80 units or more
D1 – Non-residential institutions	2,500 sq m GFA or more	Always sought where justified by travel demand or transport conditions
D2 – Leisure	1,000 sq m GFA or more	1,000 sq m GFA or more

TRAVEL PLANS

3.52 Wherever a Transport Assessment arises under the threshold table, submission of a Travel Plan is also expected as one way of mitigating the transport impact of the development. Travel Plans may also be sought from smaller developments. Transport for London indicates that a Travel Plan should generally be provided for food and drink uses (A3, A4, A5) because of their particular

transport characteristics, and also that a simplified Travel Plan (an Enterprise Scale Travel Plan) should be provided for businesses and establishments below the Transport Assessment thresholds where 20 or more staff will be employed.

- 3.53 Travel Plans are formulated by applicants and/or occupiers, in partnership with the Council and/or public transport operators where appropriate. They can be produced for housing, workplaces, schools, and community and leisure facilities. A Travel Plan aims to deliver sustainable transport objectives for a specific site or organisation, and involves:
- a holistic package of measures provided as part of the development and a long-term management strategy that is regularly reviewed;
 - a combination of physical initiatives – design features, new transport infrastructure or new services – and promotion activities such as awareness-raising and marketing;
 - support for walking, cycling, public transport use and green servicing techniques;
 - restraint on car parking and use of motor vehicles;
 - targets for the proportion of trips and deliveries made by each form of transport;
 - ongoing monitoring requirements.
- 3.54 Useful guidance on Travel Plans includes **Making residential travel plans work: guidelines for new development** (Department of Transport 2005), **Developing and implementing travel plans – a good practice guide for the NHS in London** (Transport for London – NHS, 2004), **Workplace Travel Planning** (Transport for London, 2008) and **Residential Travel Planning** (Transport for London, 2008).

Key references/evidence

- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Walking Plan Second Edition 2006
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.55 The Council does not consider that there are any reasonable or appropriate alternatives to considering the transport implications of proposals to make sure that development is properly integrated with the transport network.

Walking, cycling and public transport

- 3.56 One way of reducing the environmental impacts caused by motorised travel is to provide more sustainable alternatives. Consequently, the Council requires development to provide for travel by walking, cycling and public transport. This requirement also ensures that people can still visit new developments if they do not have access to a car.

Preferred Policy DP14 – Walking, cycling and public transport

The Council will promote walking, cycling and public transport use. Development should make provision for pedestrians, cyclists and public transport, and may also be required to provide for interchange between forms of transport. Provision should include:

- convenient, safe and well-signed routes including footways and cycleways designed to appropriate widths;
- safe road crossings where needed for access between the development and existing transport networks;
- bus/ tram stops, shelters, passenger seating and waiting areas, signage and timetable information where necessary to provide access to the development;
- other features associated with pedestrian and cycling access to the development, such as seating for pedestrians, high quality cycle parking, workplace showers and lockers;
- repair of any construction damage to transport infrastructure and reinstatement of all affected transport network links and road and footway surfaces following development.

The Council will resist development that would be dependent on travel by private motor vehicles.

The Council will seek to secure travel interchange facilities in locations that maximise travel benefits and minimise environmental harm. Passenger transport interchanges should provide for the co-ordination of arrival and departure timetabling on different services as far as possible. Interchanges catering for long-distance journeys should provide refreshments, toilets and baby changing facilities.

- 3.57 Accessibility in the Camden is generally good. All of the Borough is within 6.5 km of a national rail terminus at King's Cross/St Pancras or Euston, there are a number of dedicated cycle tracks, there are 55 high frequency bus routes, 27 night bus routes, and 23 tube stations are within the borough or on the boundary (8% of all stations on the tube network). The few areas in the borough where development would have relatively limited accessibility to public transport are at the fringes of Hampstead Heath and Primrose Hill, and to a lesser extent around the junction between Agar Grove and York Way. In these areas, and in some other parts of the borough, private cars will be the only practical option for some journeys. However, it is possible throughout the Camden to provide for some journeys to be made in more sustainable ways. Developments will be dependent on travel by private motor vehicles if they are designed without a safe means of access to footways, nearby bus-stops, and a road or other route appropriate for cyclists. These will be minimum requirements for all development.
- 3.58 To encourage people to make sustainable transport choices, the options available will need to form a continuous network of convenient and pleasant routes that make people feel safe, link to all parts of the borough, are easy to use by people with mobility difficulties, and be integrated by facilities to make it easy to change between one form of transport and another (such as catching a bus from an underground station). The Council works directly to enhance the parts of the network it controls by bidding for funds through the Local Implementation Plan and by managing the network in a way that accommodates sustainable transport measures. However, the design of a development and the way it interfaces with transport networks will be major factors influencing the transport choices of future occupiers and visitors.

- 3.59 Preferred Policy DP13 – **Development and Transport Implications** sets out the basic considerations that guide the integration of development with transport networks and the preparation of a Transport Assessment. The detailed considerations that are relevant will depend on the scale and function of the development and the capacity of the routes that serve it, but potentially cover a number of aspects of the linkage between the site and each transport network, which are as follows.
- 3.60 **Links to networks** – Links to the road network are usually also the links to walking, cycling and public transport network. The networks are:
- walking – the Camden Walking Plan indicates that the network is based primarily on the pavements of the borough's streets, but should include footpaths, crossing points, open spaces, canal towpaths and public circulation spaces (for example in transport interchanges and shops);
 - cycling – the most recent review of the Camden Cycling Plan indicates that the Council has adopted the strategic London Cycle Network for the capital, and has substantially completed works to create the priority London Cycle Network Plus across Camden – future priorities involve measures to make cycling safer at traffic lights, one-way streets and road closures;
 - buses – a map showing the borough's bus routes appears in the Local Implementation Plan, however the location and convenience of boarding points and the frequency of services will be key factors in determining how a development should be connected to the network;
 - rail, underground and proposed Cross River Tram – there will be a limited number of developments in the borough that involve direct links to the fixed transport infrastructure of trains and trams, expected to be those in the borough's Opportunity Areas, at West Hampstead Interchange and at Camden Town Underground Station. However, access to these networks using other forms of transport should be a consideration for all schemes which generate significant travel demand.
- 3.61 **Footpaths and cycle routes** – In order to maintain pedestrian and cyclist safety, links should be designed to prevent conflict between motor vehicles, cyclists and pedestrians. Footpaths need to be wide enough for the number of people who will use them so they do not spill onto roads. They should also include features to assist vulnerable road users, including the provision of dropped kerbs and textured paving where appropriate. Safe facilities for cyclists, either fully segregated or on the road, offer the best prospect for reducing the level of cycling on pavements. Measures for walking and cycling will often need to extend beyond the site if development will increase flows nearby, including (for example) footway widening, new pedestrian crossing facilities, and improved sightlines for cyclists. Our Camden Planning Guidance supplementary document and Streetscape Design Manual include guidance on designing spaces for pedestrians and cyclists.
- 3.62 **Buses** – There may be occasions when there is no spare capacity on existing bus services, and to enable a development to benefit from public transport services, a financial contribution to increase capacity would be necessary (for example through increased frequency, additional bus lane provision, or priority for buses at traffic lights). More commonly, measures to enable use of buses will be focus on provision of information within the development, improving the route to the stop, and enhancing facilities at the bus-stop. Possible measures include signing the route, seating and shelters. It may sometimes be necessary to pool contributions, particularly where there are cumulative impacts from nearby developments and an increase in capacity is needed.
- 3.63 **Other features** – The availability of routes alone is not sufficient to provide access to a development for pedestrians and cyclists, and many developments will need to make other provisions. The nature of the route is important, especially for disabled people and people with other mobility difficulties. The environment and function of a route can be enhanced by direction signs, dropped kerbs, tactile paving, seating (especially at the top of inclines) and planting – but

a clutter of street furniture can be obstructive, especially to disabled people. At origins and destinations, cyclists will need storage for bicycles, equipment and protective clothing, and will often need to shower. High quality cycle parking is required in accordance with Preferred Policy DP17 – **Parking standards and limiting the availability of car parking** and guidance in our Camden Planning Guidance supplementary document. Details of other cycling initiatives that may be sought accompany Preferred Policy DP16 – **Parking and the impact of development**.

- 3.64 **Maintenance** – Poor design or maintenance of road and footpath can lead to surfaces that are damaged and uneven, and are potentially dangerous to cyclists, people with mobility difficulties and other pedestrians. The Council's Streetscape Design Manual sets out a standard of paving construction required for streetworks to the public highway, which maximise durability and minimise maintenance costs. Developers are encouraged to apply similar standards to works within the site. Construction Management Plans are expected in association with Core Strategy Preferred Approach CS7 – **Reducing the environmental impact of travel**, and should include measures to make good footpaths and roadways after development.
- 3.65 **Interchange** – Most journeys involve an interchange between one form of travel and another (such as a walk to the bus stop or station), and developments will sometimes need to cater for this. The creation of convenient and pleasant interchanges will encourage people to use alternatives to the car. A number of existing interchange points in the borough are likely to be developed in conjunction with the borough's Opportunity Areas, Areas for Intensification and with programmed transport investment. Interchanges where additional development is expected to come forward include Euston Station, Tottenham Court Road, West Hampstead and Camden Town Underground Station. Where development is proposed at an interchange between public transport services, the Council will expect the inclusion of facilities to make interchange easy and convenient for all users, and maintain passenger comfort.

Key references/evidence

- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Walking Plan Second Edition 2006
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.66 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not expect developments to contribute towards local streets and public spaces, cycle parking and appropriate facilities for public transport.

Our preferred approach reflects the principles set out in PPG13, which strongly promotes walking cycling and public transport. Similarly, the London Plan places a heavy emphasis on encouraging a modal shift to more sustainable forms of transport. It is reasonable and appropriate for developments to contribute towards the demand that they generate. for infrastructure and facilities. Our preferred option performed more strongly in the Sustainability Appraisal as it would deliver public realm and health benefits, as well as encouraging sustainable travel and reduced car use.

Making the best use of highways and street spaces

- 3.67 This section relates to development linking directly to the highway network, and also the Council's own highway management works. The term highway is used to encompass all footpaths and cycleways (including those not alongside roads) that are by the Highway Authority.
- 3.68 Our Core Strategy notes that the Council has a duty to provide for the efficient movement of vehicles and pedestrians on the road network. We do this by enabling and promoting walking, cycling and public transport, which has potential to limit the pressure on existing network capacity and allow the best use to be made of existing road space. The balance struck between different users on each link in the network will depend on the link's character and its role in the road network. To enable the network to operate efficiently and safety, connections from new developments need to reflect the nature of the link that they connect to.

Preferred Policy DP15 – Making the best use of highways and street spaces

The Council will seek to make the best use of Camden's highways and street spaces. We will resist development that would:

- harm highway safety or hinder pedestrian movement;
- provide inadequate sightlines for vehicles leaving the site; or
- harm on-street parking conditions or require detrimental amendment to Controlled Parking Zones.

Where development will be connected to the highway network, the Council will require all new roads, footpaths, cycleways, footpaths and other access routes to be constructed to a standard it considers to be appropriate for adoption, and expect the routes to be adopted, owned and managed by the relevant Highway Authority as part of the public realm.

Developments connecting to the highway network should:

- encourage the use of the most appropriate roads by each form of transport and purpose of journey, in accordance with Camden's road hierarchy;
- avoid direct vehicular access to the Transport for London Road Network (TLRN) and other Major Roads; and
- discourage the use of local roads by through traffic.

Works affecting highways should:

- comply with the recommendations of a safety audit;
- address any history of traffic-related accidents in the vicinity of the proposals;
- address the needs of wheelchair users and other people with mobility difficulties, people with sight impairments, children, elderly people and other vulnerable users;
- meet any need for physical segregation between road users;
- avoid disruption to the highway network and its function, particularly use of appropriate routes by emergency vehicles; and
- respect the amenity, character and appearance of the public realm and the wider area.

GENERAL REQUIREMENTS

- 3.69 Where proposals involve direct connections to the highway network, the Council will consider their impact on highway safety, pedestrian movement, kerbside parking and Controlled Parking Zones. These considerations also apply to proposals for additional off-street parking spaces and servicing areas.
- 3.70 Vehicles joining the highway network need clear views of pedestrians, cyclists and other traffic, and users of the highway network need clear views of those joining it. Views can be obstructed by boundary treatments and parked cars. The relationship between motor vehicles and other users such as cyclists and pedestrians is particularly sensitive. Vehicles waiting to join the network can obstruct movements on the pavement and force cyclists towards the centre of the road. The attention of pedestrians is easily diverted, especially in residential areas where vehicles are less dominant and streets may be used for children's play. Connections to the network should therefore be designed with appropriate sightlines, visibility splays and queuing distances to reflect the character of the development, local highway conditions, traffic speeds and pedestrian activity. Guidance is included in the Department for Transport's Manual for Streets and our Camden Planning Guidance supplementary document.
- 3.71 The Council manages on-street parking on the basis of designated Controlled Parking Zones, in which some spaces are available on a pay-and-display basis, but many are reserved for holders of an appropriate parking permit. Demand for on-street or kerbside parking exceeds supply in much of the borough, and many streets suffer from parking stress in terms of spaces available to residents. These are identified in our Camden Planning Guidance supplementary document. Creation of new links to access development should not involve overall loss of one or more on-street parking spaces, particularly in areas of parking stress. The Council will consider relocating kerbside parking spaces to allow access to development, but only provided that any necessary amendment to the road layout and the Controlled Parking Zone will be funded by the development and can be achieved without harming other road users or highway safety.

ADOPTION

- 3.72 The Council seeks to ensure that the best use is made of new links to the highway network (whether roads, footpaths, cycle routes). We can only ensure this if new links are built to an appropriate standard for the role that they will fulfil in the network, and are subsequently managed as part of the highway network. In most cases, the new links will be managed by the Council as the Highway Authority, but Transport for London is the Highway Authority for the Transport for London Road Network – see other relevant paragraphs in this section. The Council will expect any links built by a developer to provide the same quality of design and construction as works commissioned by the Highway Authority.
- 3.73 The Council is particularly concerned to ensure that new routes are designed and constructed to be safe for all road users, in accordance with the criteria for works affecting highways. To achieve integration into the network and the public realm, design and construction should also reflect the style and materials used in local public spaces and their surrounding buildings. However, the quality of materials and construction should also reflect Camden's Streetscape Design Manual and ensure that the Highway Authority does not incur disproportionate maintenance costs in the future.
- 3.74 The Council expects design of new developments to be safe and accessible to all (see Core Strategy Preferred Approach CS12 – **Making Camden a safer place**), and resists the design of new development as "gated communities". We will therefore seek to ensure that access routes are available to the public as rights of way, maximising levels of activity and permeability and contributing to natural surveillance. The Council considers that this can best be achieved where the relevant Highway Authority adopts access routes as part of the public realm.

ROAD HIERARCHY

- 3.75 Camden's road hierarchy is set out in the Road Network Management Plan. There are no parts of the Highways Agency's network of national roads (trunk roads and motorways) in the borough. Camden's four main categories (and the most significant sub-categories) are set out below, together with the roles of each tier. The top tiers are shown in the Core Strategy as Map 11. When considering development proposals, the Council uses the hierarchy to pursue the following aims:
- to limit the number of routes available to through traffic;
 - to remove goods vehicles from unsuitable routes;
 - to improve conditions for pedestrians and cyclists;
 - to reduce the risk of long delays to bus services;
 - to reduce accidents; and
 - to reduce the adverse environmental impact of traffic.
- 3.76 **Metropolitan roads – the Transport for London Road Network (TLRN)** – Transport for London is the Highway Authority for these roads, which cater for long-distance traffic movements, and are the focus of movement by lorries, buses and emergency vehicles. They include Central London's Ring Road (Euston Road and the King's Cross one-way system) and the Borough's two busiest routes to the north (the A41 Finchley Road and the route via Hampstead Road – Camden High Street/ Camden Street – Camden Road). Creating new accesses from these roads or using them for on-street servicing will not usually be acceptable.
- 3.77 **Major roads** – These cater for movements around London and around the borough, such as trips to town centres. They also distribute traffic from national and TLRN roads towards destinations on other roads. The major roads include all the Borough's other busy bus routes (those with combined frequencies exceeding 15 per hour that are not TLRN roads), and almost

all of them also serve as emergency routes. Use of these roads for on-street servicing will be limited. There are a number of sub-categories of major-roads, the most significant of which is the Strategic Road Network. The Traffic Management Act 2004 defines these as strategic roads in London, and requires Transport for London and the relevant London borough to be notified of proposals that affect them. The Strategic Road Network includes remaining 'A' roads south of Euston Road, and routes northwards through Eversholt Street, Kentish Town Road and Kilburn High Road. In Camden, all the roads in the Strategic Road Network are important bus routes.

- 3.78 **District roads** – District roads comprise all remaining bus routes and emergency routes. They are also distributor roads of local significance, carrying traffic from the major roads to local roads that are used primarily to reach individual properties. However, they should not be used by heavy goods vehicles except for essential deliveries. District roads do provide direct access to many properties, and on-street servicing may be acceptable subject to its impact on safety and the environment.
- 3.79 **Local roads** – These provide direct links to properties. They are not appropriate for bus or emergency routes. On-street servicing may be acceptable subject to its impact on safety and the environment. The Council will prioritise pedestrians in treatment of local roads, and may use measures such as road closures and lorry bans to prevent use by through-traffic.
- 3.80 Within the road hierarchy, it is the upper tier designations that impose the greatest constraints on developments. The long-distance and London-wide traffic role of the **Transport for London Road Network** and this major roads in the **Strategic Road Network** should take precedence over access requirements for individual development sites and premises. New accesses to these will only be permitted where a suitable junction can be provided as part of the development. Preferred Policy DP13 – **Development and transport implications** indicates that proposals should be linked to the transport network, and also address any additional capacity or demand management needed off-site.

WORKS AFFECTING HIGHWAYS

- 3.81 Road safety is a theme that connects Core Strategy Preferred Approach CS7 – **Reducing the environmental impact of travel** and CS11 – **Improving Camden's health and well-being**. To ensure that safety is properly considered where highway alterations are proposed, all highway works, including traffic management, will undergo formal safety audit checks at the planning, design and implementation stages. Safety audits provide a review of the implications of proposed works that is independent of the designer, and help to ensure that safety is not compromised by other objectives such as cost saving. They have shown positive results in reducing the number of traffic-related accidents.
- 3.82 In managing the highway network, and in controlling works that affects highways, Camden has regard to the hierarchy of road users set out in its Local Implementation Plan. The priority given to different users will from one road to another depending on its role, but over the network as a whole, the Council places pedestrians at the top of the hierarchy of road users. Walking is a component of almost every journey, and consequently pedestrians include many groups, each with differing needs and subject to different safety risks. When assessing proposals for management and works, the Council will give priority to vulnerable road users and address known accident hazard sites or areas.
- 3.83 Measures intended primarily to restrain through-traffic and the private car can have undesirable impacts on other forms of transport after implementation. The Council will therefore assess proposals in terms of their direct impacts on other users as well as the benefits of reducing the dominance of cars in the street environment. We will use such assessment to ensure, for example, that speed humps do not hamper the passage of ambulances and buses, that cyclists are exempted from road closures, and that all pedestrian crossing movements are accommodated as part of junction works.

- 3.84 All work affecting highways (including works associated with development, traffic management and calming, bus priority measures, and environmental schemes) can create opportunities and obstacles to pedestrians and cyclists. All such work will also be assessed in terms of its impact on the attractiveness of walking and cycling, particularly whether the work maintains and improves accessibility and safety, and whether the measures avoid potential for conflict between pedestrians and cyclists.
- 3.85 The Council will seek to reduce physical conflicts between motor vehicles and other road users. Footways should generally cater for pedestrians and carriageways for vehicles. We will seek to create segregated cycleways where this is feasible, but the designation of cycle lanes on the carriageway will often be the safest practicable option. There may be potential for shared surfaces in some circumstances, for example at locations within an established area of traffic calming measures, however these will only be appropriate where traffic speeds and volumes are low. Shared surfaces are unlikely to be appropriate on through-routes for cyclists.
- 3.86 Work affecting highways can cause disruption to pedestrian and vehicle movements and to local occupiers during implementation. Highway works that cause delays and diversions for road users, particularly buses and emergency vehicles, or that hinder access to premises, can be dangerous and highly unpopular. The Council seek to limit direct disruption to residents through controls on working methods, hours of working and the period during which works are undertaken.
- 3.87 Works to highways can present opportunities and threats to an area's amenity, character and appearance. The Council will use the design of works and planning obligations to minimise environmental harm and maximise environmental benefits. Camden's Streetscape Design Manual gives guidance on the environmental qualities that are expected on the Borough's streets. Considerations include planting, landscaping, paving materials and street furniture, and avoiding a confusing variety of signs and surfaces.
- 3.88 The Council does not currently safeguard any land for road construction or widening. Transport proposals falling partly or wholly within Camden are included in the infrastructure table as part of the Core Strategy.

Key references/evidence

- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Draft Camden Green Transport Strategy 2008 – 2012
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.89 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not set out the Council's approach to development and works affecting public highways and street spaces

The Council considers that this option would fail to ensure that such future works would achieve sufficient standards in terms of highway safety, protecting pedestrian movement, style and materials, impact on the road network and on local roads, as well as wider safety issues and accessibility for those with mobility difficulties.

Parking and the impact of development

- 3.90 As noted in the Core Strategy in connection with Preferred Approach CS7 – **Reducing the environmental impact of travel**, a limited supply of car-parking is a key factor that encourages people to use more sustainable ways to travel. Consequently, the Council seeks to limit the availability of car parking by encouraging the removal of existing private parking, carefully controls the creation of additional parking, and encourages more sustainable use of parking spaces. The Council is directly responsible for managing on-street parking in the borough, and produces a Parking and Enforcement Plan to guide its parking management. However, our planning policy documents guide development decisions that affect the supply of on-street and off-street parking. Developments that add to the supply of car parking, relocate car parking, or are neutral in terms of capacity, can all have an impact on parking conditions in the borough.

Preferred Policy DP16 – Parking and the impact of development

The Council will seek to ensure that there are no additions to car parking spaces that would have negative impacts on parking conditions, highways or the environment, and will encourage the removal of surplus car parking spaces. We will resist development that would:

- harm highway safety or hinder pedestrian movement;
- provide inadequate sightlines for vehicles leaving the site;
- add to on-street parking demand where on-street parking spaces cannot meet existing demand, or otherwise harm existing on-street parking conditions;
- require detrimental amendment to existing or proposed Controlled Parking Zones;
- create a shortfall of provision in terms of the Council's Parking Standards for cycles, people with disabilities, service vehicles, coaches and taxis;
- create a shortfall of public car parking, operational business parking or residents' parking;
- create, or add to, an area of car parking that has a disproportionate visual impact.

The Council will require off-street parking to:

- preserve the setting of a building and the character of the surrounding area;
- preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the visual appearance of the area; and
- provide adequate soft landscaping, permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface run-off.

The Council will resist public off-street parking unless it is supported by a Transport Assessment and shown to meet a need that cannot be met by public transport. The Council will expect new public off-street parking to be subject to a legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. We will also seek a legal agreement to secure removal of parking spaces in response to any improvement to public transport capacity in the area.

Where parking is created or reallocated, Camden will encourage the allocation of spaces for low emission vehicles, city car clubs, pool cars, city bike schemes and electric vehicle charging equipment.

ON-STREET CAR PARKING

- 3.91 On-street car parking is a limited resource, and demand exceeds supply in much of the Borough. It caters for residents who do not have off-street spaces at home as well as for people visiting businesses and services. The Council manages on-street parking on the basis of designated Controlled Parking Zones, in which regulations control how parking may be used on different sections of the street and at different times. There is a particularly high demand for on-street parking by residents in areas with many more flats than there are drives or garages. Our Camden Planning Guidance supplementary document give details of areas where there is parking stress for residents, and how it is assessed.
- 3.92 Where the overall level of parking available in an area is less than the demand, limits on car parking can cause queuing on the street and illegal parking, which can in turn harm highway safety and form barriers to pedestrians. Consequently, unless there is evident spare capacity on-street, the Council will resist developments that will reduce the amount of on-street parking or add to on-street parking demand.
- 3.93 Development that adds to the number of homes – including dividing houses to provide flats – will often increase on-street parking demand. Preferred Policy DP17 – **Parking standards and limiting the availability of parking** indicates how development can be designated as car-free and car-capped to prevent additional homes from increasing on-street parking demand. Development of additional units or floorspace will be resisted where it would cause unacceptable parking pressure, particularly in areas of identified parking stress.
- 3.94 The following paragraphs set out the Council's approach to development where the creation of off-street private parking would reduce the number of on-street parking spaces.

CREATING PRIVATE OFF-STREET CAR PARKING

- 3.95 On-street spaces can be used by many different people during different types of visit throughout the day, whereas private spaces will generally only be used for one type of visit, often by a specific vehicle, and will remain unused at other times. For example, a resident's private parking space will often be unused for most of the daytime if the car is used for the journey to work.
- 3.96 Creating private off-street parking frequently involves the loss of on-street spaces. A common example would be where kerbside parking is removed to enable vehicles to cross over the pavement to a garden or forecourt. Given that each kerbside parking space can meet the needs of different users at different times, the creation of a pavement crossing for off-street parking is likely to increase the pressure for on-street parking. This pressure will be increased even further if it is necessary to remove more than one kerbside space to create an appropriate access to the private parking area.
- 3.97 Creating off-street parking necessarily involves creating a link to the highway network or intensifying the use of an existing link. Preferred Policy DP15 – **Making the best use of**

highways and street spaces applies to off-street parking as it does to other proposals that involve connecting development to the highway network, and the Council will resist off-street parking that would harm highway safety, hinder pedestrian movements or provide inadequate sightlines.

- 3.98 Off-street parking can cause environmental damage in a number of ways. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure in Camden's streets, especially in its Conservation Areas. This form can be broken by the removal of garden features and the imposition of extensive areas of paving and parked cars to the front of buildings, severely damaging the setting of individual buildings and the character of the wider area. Large areas of paving can also increase the volume and speed of water run-off (especially paving over formerly porous surfaces such as front garden planting areas), which adds to the pressure on the drainage system and increases the risk of flooding from surface water.
- 3.99 Development of off-street parking will be resisted where it would cause unacceptable parking pressure, particularly in identified areas of parking stress. Off-street parking may also be resisted to protect the environment, highway safety and pedestrian movement. Our Camden Planning Guidance supplementary document give details of areas of parking stress, the necessary dimensions for off-street parking spaces, visibility requirements at access points, and environmental concerns that arise from garden and forecourt parking.

PUBLIC OFF-STREET CAR PARKING

- 3.100 The Council does not support the creation of additional public off-street car-parking in the borough. Established public off-street car parks in Camden are generally commercially operated and offer contract spaces to commuters. The Council is therefore unable to control their charges to effectively deter unnecessary car use. Charges tend to be based on what the market will support, and do not mitigate the costs imposed by congestion and environmental damage.
- 3.101 Any proposal for additional public car-parking would need to be supported by a Transport Assessment, and by a submission detailing hours of operation, proposed means of entry control, access arrangements and layout of spaces. The submissions would need to show that the proposal would not be harmful in terms highway safety and on-street parking conditions, in accordance with criteria set out in Preferred Policies DP15 – **Making the best use of street spaces** and DP16 – **Parking and the Impact of Development**. It would also need to show that the proposal would meet a need generated by a particular land-use or user group, which could not be met by public transport. For example, public parking for facilities such as hospitals might be justifiable if public transport provision is poor or visitors are present during the night. The Council would strongly resist creation of speculative public-car parking targeted at general demand.
- 3.102 The Council will seek a legal agreement to ensure that an appropriate pricing structure applies to any additional public car-parking. The pricing structure should:
- preclude free parking, as this would encourage unnecessary car journeys;
 - favour short stay parking (up to two hours), which is appropriate for collecting bulky goods or picking-up travellers with heavy luggage;
 - levy a punitive charge on long stay parking (over four hours) to deter commuters.
- 3.103 The Council will also seek a legal agreement to provide for the removal of general car parking in tandem with any improvements to public transport that would undermine the original case for the proposal. The agreement should arrange for removed spaces to be designated for people with disabilities or for more sustainable types of travel. Examples are city car-clubs, electric vehicle charging points and city bike schemes. These are described in more detail in further paragraphs of this section.

REMOVING OFF-STREET CAR PARKING

- 3.104 Camden contains a large amount of private off-street car parking and a significant amount of public off-street car parking that was developed before car parking restraint was introduced and is beyond the Council's control. Private off-street spaces are generally free-of-charge to the driver, and are particularly likely to encourage the use of cars for trips that could be made in more sustainable ways.
- 3.105 The Council generally welcomes proposals to reduce the amount of off-street parking in the borough, provided that the removal of spaces would not:
- lead to a shortfall against the minimum element of parking standards relating to cycles, people with disabilities, service vehicles, coaches and taxis;
 - cause hardship to existing users, particularly if the spaces are used by shoppers, by nearby residents, or for the operational needs of a business; or
 - displace parking on to the highway, particularly in identified areas of parking stress.
- 3.106 The Council especially welcomes proposals which include conversion of general car parking spaces to provide:
- designated spaces for people with disabilities, cycle parking, and any needs for off-street servicing, coach and taxi needed to meet current parking standards; or
 - designated spaces for more sustainable forms of transport, such as city car-clubs, city bike schemes and low emission vehicles.
- 3.107 Where car parking spaces are currently well-used or are associated with a significant generator of travel demand, the Council will expect submission of a Transport Assessment to show that the removal of spaces can be accommodated without harmful impact. A Travel Plan may also be sought to help existing users switch to sustainable ways of travelling. Details of significant generators of travel demand are given in the section on Development and Transport Implications.

LOW EMISSION VEHICLES, POOL CARS, CITY CAR-CLUBS, AND CITY BIKE SCHEMES

- 3.108 Camden's Core Strategy promotes the use of walking, cycling, low emission vehicles, car clubs and pool cars as alternatives to the use of private cars. In dealing with proposals involving provision of additional parking or finding new uses for parking spaces, the Council will promote facilities for sustainable transport as an alternative to creating general car parking spaces.
- 3.109 **Low emission vehicles** are those which involve clean technology, such as electric and LPG cars (LPG is also known as Liquefied petroleum gas, propane or butane). They can potentially reduce pollution and improve air quality in Camden because they reduce exhaust gas and particulate emissions compared with petrol and diesel engines. They are not necessarily low carbon vehicles, as their power is derived from fossil fuels in most cases, but they also offer potential for carbon reduction in the context of other measures to reduce car use. The Council will support provision of electric vehicle charging spaces as an alternative to any general car parking spaces, but particularly if the charging spaces will be for electric pool cars or electric car-club cars.
- 3.110 **Pool cars** provide for the operational needs of workplaces during the working day. They allow a single car to meet the needs of a number of different users, discourage use of the car for work journeys that could be made more sustainably (particularly for commuting), and consequently reduce the amount of space that is needed for car parking. The Council will support the provision of pool car spaces as an alternative to general car parking spaces in non-residential development.
- 3.111 **City car-clubs** are membership car-hire schemes, available for booking 24 hours everyday and picked-up locally. They effectively pool cars between member households, allowing households

to avoid the costs of car ownership, and reducing the overall use of cars and car parking spaces. The Council will support the provision of car-club spaces as an alternative to general parking spaces in locations where they can be made available to car-club members.

- 3.112 Parking for low emission vehicles, pool cars and city car-clubs should be provided from within the existing stock of general car parking, or within the general car parking allowed by maximum Parking Standards. If they are provided in addition to general car parking spaces, they are unlikely to be effective in encouraging sustainable transport.
- 3.113 **‘Cycle stations’** and other cycling initiatives – Cycle stations are cycle parking facilities available to the public, usually in a secure area with restricted access. They may be staffed or take the form of self-service lockers. The Council is working with Transport for London and the Holborn Business Improvement District to establish a cycle station for Holborn businesses, and seeking to establish fully public cycle stations across the borough. Cycle stations can form part of a development's contribution to sustainable transport, and have been included in approved schemes for the King's Cross Opportunity Area (1,000 cycles) and Regent's Place/ Euston Tower (approx 70 cycles).
- 3.114 Bicycle hire facilities may also form an appropriate use for former parking areas, and a contribution to sustainable transport. They may be provided in conjunction with cycle stations. They can help encourage a culture of cycling by providing for users who do not wish to buy and maintain expensive equipment. They are particularly helpful for people completing journeys which commenced on public transport, for visitors, and for sight-seeing or leisure. Bicycle hire is sometimes associated with tourist information facilities promoting routes of interest.
- 3.115 Camden is exploring a number of different options for cycle hire schemes. One is the City Bike Scheme, which is broadly comparable with a City Car Club. The bikes have dedicated parking locations, often on-street, and collection is self-service (using a coin-operated system or electronic payment). The bikes can be returned to any dedicated location.

Key references/evidence

- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.116 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not restrict the provision of new off street parking

Government guidance on transport in PPG13 states that parking policies should be used to promote sustainable transport choices and reduce reliance on the car. London Plan Policy 3C.23 states that DPD policies should adopt on- and off-street parking policies that encourage sustainable travel and help limit car use; and reduce the amount of existing, private, non-residential parking. The alternative option would therefore be contrary to PPG13 and the London Plan.

Do not promote the provision of spaces for low emissions vehicles

This option was found to be less sustainable than the Council's preferred approach in the Sustainability Appraisal, as it fails to take advantage of the opportunity to reduce carbon emissions from private vehicles, as well as improving air quality.

Parking standards and limiting the availability of car parking

Preferred Policy DP17 – Parking Standards and limiting the availability of car parking

Development should comply with the Council's parking standards, and should not exceed the maximum standard for car parking (excluding spaces designated for disabled people).

The Council expects development to be car-free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport. In the listed locations, where a compelling case for the inclusion of general on-site car parking is made, we will expect car-capped development. We will also encourage car-free development in other locations designated as Controlled Parking Zones.

For car-free and car-capped development the Council will:

- limit on-site car parking to spaces designated for disabled people, any operational or servicing needs, and spaces designated for the occupiers of development specified as car capped;
- not issue on-street parking permits; and
- use a legal agreement to ensure that future occupants are aware they are not entitled to on-street parking permits.

PARKING STANDARDS

3.117 Parking standards are set out in Appendix 1. The parking standards have been set to:

- meet the needs of people with disabilities – by applying minimum standards;
- provide an alternative to on-street servicing, taxi and coach activity – by applying minimum standards; and
- encourage people to meet their travel needs by cycling – by applying minimum cycle parking standards;
- encourage people to consider all alternatives to private car travel – by applying maximum parking standards to general car parking provision.

3.118 The minimum element of the standards applies to all development, including new construction, conversion, and changes of use. The Council accepts the need for a flexible approach to some aspects of the minimum standards, for example where the nature of the street frontages preclude access to on-site car parking for disabled people, and will may consider the potential for designating disabled parking bays on-street. Guidance on the space and design requirements for car parking, cycle parking and service bays are included in our Camden Planning Guidance supplementary document and Streetscape Design Manual.

3.119 The maximum element of the standards applies to all development, including new construction, conversions and changes of use, except for car-free development. Car-free development should not involve any car parking except designated disabled parking spaces. Where the Council expects car-free development, the maximum element of the parking standard should not be provided.

3.120 The maximum parking standards are intended to limit the potential for commuting to a workplace by private car (other than for disabled people). A workplace's operational needs are only considered to include journeys to work if travel is at times when public transport services are severely limited or if employees need continuous access to a car for work purposes whether or not they are at the workplace. Pool cars are a more sustainable way to meet needs for car travel which only arise when an employee is at the workplace.

3.121 Details of parking arrangements should be submitted with planning applications, showing how car, servicing and cycle parking requirements will be met. Cycle parking provision cannot easily be fitted into development proposals retrospectively because of the need to provide convenient access from entrance level and the need to provide quality facilities that are secure and are easy for everyone to use. Applicants should be aware that cycle parking for residents and employees cannot usually be met off-site due to the security and shelter necessary for long stays.

3.122 The maximum standards in Appendix 1 include separate figures for the Central London Area (including the King's Cross, Euston and Tottenham Court Road Opportunity Areas) and for the rest of the Borough. Lower maximum standards are applied to Central London to reflect its particularly high public transport accessibility and also the high impact of motor vehicles in the area. As Camden expects development in the Central London Area to be car-free, the Central London standards will only apply where a compelling case can be made for the inclusion of general on-site car parking in the context of a car-capped development. The arrangements for car-free and car-capped development are explained in other paragraphs of this section.

3.123 The Council further controls the impact of motor vehicles in Central London by designating it as a Clear Zone Region where specific policies and measures are pursued to reduce pollution, improve air quality, make streets more liveable, and encourage people to use sustainable transport. More information on Clear Zones is included in development policies relating to Improving the quality of life of Camden's communities.

CAR-FREE AND CAR-CAPPED DEVELOPMENT

3.124 Car-free and car-capped developments have potential to reduce the impacts of moving traffic and parked cars in the borough, particularly in the most congested areas. Much of Camden experiences poor air quality and severe competition for car parking. The entire borough has been designated as an Air Quality Management Area, and Camden's Central London Area has been designated as the Camden Clear Zone Region to address transport related problems (see Preferred Policy DP26 – Clear Zones). The demand for on-street parking exceeds the spaces available across the Borough, particularly on the streets in Central London and around town centres.

3.125 The Council has been successfully promoting car-free housing since 1997 as a way of encouraging car-free lifestyles, promoting sustainable ways of travelling, and helping to reduce the impact of traffic. Car-free housing can facilitate sustainability and wider objectives, including:

- improving the urban realm and the street frontage;
- freeing space on the site from car-parking, to allow additional housing, community facilities, play areas, amenity spaces and cycle parking;
- enabling additional development where there is no spare capacity for additional cars to park;
- enabling additional development in areas where the Council is seeking to improve air quality.

The car-free concept is now being extended to non-residential development, which has the potential to promote car-free ways of undertaking work-related journeys and reducing car-based commuting.

3.126 Car-free development has no on-site car parking and no access to on-street parking permits. Where the Council expects car-free development, the maximum element of the parking standards should not be provided. Car-free development should meet cycle parking standards and may, where required, include on-site space for people with disabilities, servicing, coach and taxi activity. People with disabilities who are Blue Badge holders may also park in on-street spaces without a parking permit. Parking standards for bicycles, people with disabilities, servicing and coaches and taxis are set out in Appendix 1.

3.127 Car-capped development is less restricted, but has the same aims. Car-capped development has a limited amount of on-site car parking, but no access to on-street parking permits. On-site car parking should fall within the minimum element of parking standards, and if should usually be less than the maximum. On-site provision must meet cycle parking standards, and may, where required, include on-site space for people with disabilities, servicing, coach and taxi activity. On-site car parking for general needs should not exceed the maximum car parking standards for the area.

3.128 The Central London Area and the Camden town centres – other than Hampstead – are well-equipped to support car-free households and businesses as they have the highest levels of public transport accessibility in the borough, are served by Underground and Overground services, and provide opportunities to access a range of goods, services, workplaces and homes. The Council will expect development in these areas to be car-free, and will resist the inclusion of general car parking unless supported by a Transport Assessment or other compelling justification. Given the level of on-street car-parking demand in these areas, if on-site car parking can be justified, the Council will expect it to be designated as car-capped.

3.129 Car-free and car-capped development can potentially be introduced wherever parking controls are in place. However, where long-stay parking is available on-street without permits, other parking restrictions are unlikely to be successful in reducing car use. Parking controls apply to all public roads in Camden, in the form of almost twenty designated Controlled Parking Zones. These are Zones that limit on-street parking to pay-and-display parking and parking for permit-

holders. Controlled Parking Zones do not currently apply to Housing Estate roads, which are managed as 'private roads' by the Council's Department of Housing and Adult Social Care.

- 3.130 Much of the borough outside Central London and the town centres has public transport levels that are medium or better. Provided that parking controls are in force, the Council will expect car-free or car-capped development where public transport accessibility is equivalent to levels in the town centres, and will strongly encourage it elsewhere across the borough.
- 3.131 In areas of parking stress, development that adds to demand for on-street parking will not be acceptable in terms of highway safety and on-street parking conditions, as indicated in Preferred Policy DP16 – **Parking and the impact of development**. In these areas, development that creates additional dwellings or new business premises will be resisted unless car-free or car-capped.
- 3.132 To implement car-free and car-capped development, the Council needs to remove entitlements for parking permits from future occupiers. The only effective way to do this is to seek a legal agreement with the developer, as it is the only way of ensuring that all incoming occupiers are aware that they are not eligible for a permit to park on the street. Amending the Transport Management Order for each new car-free or car-capped development would be exceedingly expensive, open to challenge, and leave incoming occupiers unaware of the restrictions.

Key references/evidence

- Draft Camden Green Transport Strategy 2008 – 2012
- Camden Local Implementation Plan (LIP) 2005/06 – 2010/The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.133 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Do not extend the areas in which car-free housing is sought.	Although existing UDP policy promoting car free housing already provides benefits in terms of reducing car use, the Council considers that there are other areas within the borough that are sufficiently accessible by public transport to justify extending car free developments more widely. The Sustainability Appraisal indicated that extending the scope of car free developments would provider greater benefits in terms of reducing reliance on private motorised transport and improved air quality, subject to the adequacy of existing public transport accessibility.
Only seek car-free developments in housing schemes	The Council considers that this option would fail to take full advantage of opportunities to promote car-free ways of undertaking work-related journeys and reducing car-based commuting. The alternative option is considered to be contrary with London Plan Policy 3C.23 which promotes the minimum necessary on-site car parking for all forms of new developments, not just housing.

Movement of goods and materials

- 3.134 Transport of goods and materials is essential to the economy, but if not managed sustainably it can be harmful to the environment, residential amenity and cause congestion. This Preferred Policy sets out how the Council seeks to reduce the impact of goods transport by promoting the movement of goods by rail, water and other more sustainable methods, by locating development that generates road-based movement of goods close to the **Transport for London Road Network** or other designated Major Roads, and by seeking to accommodate goods vehicle loading and unloading within development sites.
- 3.135 Camden's Core Strategy includes a requirement for those proposing some types of development to submit prior assessments of the likely movements of goods and materials associated with the development, and the to submit plans to manage those movements. Where developments are required to provide a Transport Assessment, or will impact significantly on the transport network or environment, the Council requires submission of a Construction Management Plan and a Delivery and Servicing Plan. Detailed guidance on the form and content of these types of plans will be included in our Camden Planning Guidance supplementary document.

Preferred Policy DP18 – Movement of goods and materials

The Council will seek to promote and protect facilities for the movement of goods by rail and water, including facilities for transfer between road, rail and canal. We will promote the development of freight consolidation facilities and other initiatives with potential to reduce the impact of goods vehicles and encourage the use of sustainable vehicles for deliveries.

Development that would generate significant movement of goods or materials by road should:

- be located close to the Transport for London Road Network or other Major Roads;
- avoid any additional need for movement of vehicles over 7.5 tonnes in predominantly residential areas; and
- accommodate goods vehicles on site.

MOVEMENT OF GOODS BY RAIL AND WATER

- 3.136 The Council recognises the problems that are caused by long distance movement of goods by road, and the potential advantages of using rail and water as an alternative. The North London Line, the Gospel Oak to Barking Line and the West Coast Mainline are already used for significant volumes of rail freight. The Regent's Canal is the only navigable waterway in Camden, and is not used for any significant volume of freight movement.
- 3.137 Per tonne carried, rail freight produces nearly 90% fewer emissions than HGVs and it is also considerably safer than road freight in terms of accidents and casualties (no casualties were reported in connection with rail-freight accidents in the UK in 2005) (London Rail Freight Strategy 2005). No equivalent figures are available for canal freight, but canal movement has minimal social and environmental costs compared with the noise/vibration, air pollution and visual intrusion created by heavy goods vehicles.
- 3.138 It is rare for the sources and destinations of goods or materials to be adjacent to the rail or canal networks. Most goods moved by rail or canal will be transferred from road at the beginning

and/or end of the journey. The potential for use of rail and canal for freight movements will be limited by the availability of route-side facilities for production, distribution, waste management, and transfer to/ from the road network. Camden's only operational rail-freight terminal is an aggregates-handling facility on the Midlands Mainline at King's Cross. There is also a train cleaning facility on the West Coast Mainline at Granby Terrace (near Euston Station), where there may be potential for train to van transfers. Camden has no other operational canal-side wharves, although the canal is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from canal-side sites.

- 3.139 The Council notes that benefits of rail and canal freight need to be set against potential harm to the environment and the road network from transfer facilities, in terms of the structures involved, vehicular movements and pollution. We will protect the existing aggregate handling facility at King's Cross, which is a modern facility re-engineered in association with works for the Channel Tunnel Rail Link. We will also promote and protect other track-side and canal-side sites that come forward for transfer use or processing rail and canal freight if their benefits outweigh any harm.

MOVEMENT OF GOODS BY ROAD

- 3.140 Goods vehicles, particularly heavy goods vehicles, may have more serious impacts in certain areas. Examples are areas suffering from poor air quality, areas where many delivery points are located close together (such as town centres), narrow roads, and residential areas. Goods vehicles manoeuvring, loading and unloading add to pollution, and may cause obstructions and congestion, inconvenience and danger to pedestrians and other road users, and damage to pavements. The Council actively encourages a number of measures with potential to mitigate these impacts.
- 3.141 **Freight consolidation facilities and sustainable vehicles** – These are transfer and distribution centres that consolidate loads from a number of vehicles into single loads for delivery to a specific destination or area. They offer an alternative to a heavy goods vehicle circulating around a number of destinations, potentially reducing the need for heavy goods vehicles to access constrained areas (such as town centres), and allowing for the journey to the final destination to use more environmentally friendly vehicles with fully maximised loads. There is also potential for loads to be carried on the return journey, such as empty packaging.
- 3.142 There are two consolidation centres in the UK, both operated by Exel, one delivering to retailers at Heathrow, and one delivering to retailers at the Broadmead in Bristol. The potential for facilities in Bath, York and the South London is also being actively explored. The Council believes that there may be potential for such a facility serving Camden's Central London Area. However, we understand that high land costs and the uncertainties about the viability of self-financing schemes may prevent such a facility from being established within the Borough.
- 3.143 The Council is currently exploring a number of options for more sustainable freight delivery in Central London, including:
- promoting formation of a Freight Quality Partnership for Central London, which would bring together retailers, freight operators, Central London Boroughs, and Transport for London;
 - promoting the use of quiet and low-pollution vehicles such as electric vehicles through Delivery and Servicing Plans; and
 - promoting the use of cycle-freight as an extension to cycle courier services.
- 3.144 **Moving goods and materials on appropriate roads** – Preferred Policy DP15 – **Making the best use of highways and street spaces** seeks to guide all forms of transport to the appropriate parts of Camden's Road Hierarchy. The roads considered to be most suitable for use by lorries and other heavy goods vehicles are those in the **Transport for London Road Network**

and others designated as major roads. It will not usually be possible for development to directly access or be loaded from the Transport for London Road Network, but new development that will be served by heavy goods vehicles should be located to minimise the use of district and local roads for the movement of goods, particularly roads which provide primarily for access to residential properties.

- 3.145 The majority of service trips in central and inner London are made by freight vehicles of less than 7.5 tonnes gross vehicle weight, and this is therefore considered to set the maximum size of vehicle that should be accommodated in residential areas on a daily basis. Larger vehicles such as refuse vans and furniture vans are used in residential areas, but not usually more than once a week. A number of weight limits have been introduced across largely residential parts of the borough, the largest of which covers an area between Camden Road and Kentish Town Road, and between Fortress Road and Highgate Road, extending up to Highgate. In this area, goods vehicles exceeding 7.5 tonnes are not permitted except for access. Development which will generate movement by heavier vehicles should not be located in this area or any predominantly residential area.
- 3.146 Loading and unloading – The impact of goods vehicles can be reduced where a loading and unloading bay is included within a development, particularly where the bay can be enclosed. Developments that will need to be serviced by vehicles other than cycles or cars should incorporate space within the site for goods vehicles wherever it is feasible to do so. The space required for service vehicles is set out in the Council's Parking Standards in Appendix 1.
- 3.147 The Council also controls the impact of goods vehicles through waiting and loading restrictions. Loading and unloading is often restricted in tandem with waiting restrictions, preventing loading activity during peak hours. On-street loading bays may also be subject to restrictions. We are currently undertaking a review of waiting and loading restrictions focussed on town centres, and will seek to maximise space available for business deliveries, customers and clients.

Key references/evidence

- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Draft Camden Green Transport Strategy 2008 – 2012
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

- 3.148 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not promote a freight consolidation centre

The Council considers that it is appropriate to explore the possibility of locating a freight consolidation centre in the borough given Camden's central location and excellent transport links. The Sustainability Appraisal found that the alternative option performed more poorly than the Council's preferred approach as it would fail to consider the opportunity to reduce heavy goods vehicles movement, reduce noise impacts or help to improve air quality.

Specifically promote uses along the Regent's Canal that rely on a waterside location (e.g. commercial/light industrial developments) that could make use of the Regents Canal for freight transport

The Sustainability Appraisal indicated that this could provide a sustainable approach in helping to promote sustainable freight movement. However, the Council considers that an overly rigid approach may not be appropriate, given that some locations do not have adequate access to the handling facilities required to enable canal-side transfer facilities. The preferred policy approach provides a more appropriate and flexible means to promote water freight and protect handling facilities.

4 Improving Camden's environment

- 4.1 The Camden's Community Strategy theme **A sustainable Camden that adapts to a growing population** aims to manage the increase in our population in ways that protect, promote and enhance Camden's environment, for us and for future generations. The challenge we face is to strike an appropriate balance between growth and change and conserving and enhancing our valued places.
- 4.2 Core Strategy Preferred Approach CS8 – **Promoting high quality places** seeks to achieve this Community Strategy aim by setting out our approach to improving and protecting our local environment of buildings, public areas and open spaces, which is so important to our well-being and the quality of our lives and plays such a key part in the way the borough looks, feels and is perceived. It aims to make sure that Camden's places and buildings are attractive, safe and easy to use by:
- requiring highest standard of design that respects local context and character;
 - preserving and enhancing Camden's rich heritage of conservation areas and listed buildings ;
 - protecting important strategic and local views
 - promoting measures to make walking in Camden easier and enjoyable;
 - promoting high quality landscaping and work to streets and public spaces;
 - protecting Camden's archaeological sites and monuments.
- 4.3 Preferred Approach CS9 – **Improving and protecting our parks and open spaces and encouraging biodiversity** aims to improve and protect Camden's parks, open space and biodiversity by:
- protecting designated open space, nature conservation sites and other suitable land with the potential to be used as open space or for nature conservation;
 - securing additional, and improvements to existing, open space and land for nature conservation where opportunities arise;
 - promoting the provision of new trees and vegetation and protecting existing trees.
- 4.4 This section of our Development Policies provides the detailed planning policies to help deliver this strategy. It focuses on our built surroundings, in particular conservation areas and listed buildings, alterations, extensions and basements, archaeology and advertisements, and on our natural environment , in terms of open space and biodiversity.

WHAT YOU TOLD US

- 4.5 The main points raised on improving Camden's environment during consultation on Issues and options for the Development Policies are summarised below.
- There was support for protecting open space and ensuring development adjacent to open space did not harm that space.
 - There was strong support for improving Camden's green space network.
 - Few comments were received on the built environment element of improving Camden's environment. However, during consultation on issues and options for the Core Strategy there was support for stricter controls to protect and enhance Camden's built environment, with local distinctiveness highlighted as a key area.
- 4.6 The Development Policies Issues and Options Consultation Statement contains a summary of the comments we received on this matter and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on improving Camden's environment during consultation on issues and options for the Core Strategy.

Alterations and extensions

- 4.7 Core Strategy Preferred Approach CS8 sets out our overall strategy on promoting high quality places, seeking to ensure that Camden's places and buildings are attractive, safe and easy to use and requiring development to be of the highest standard of design that respects local context and character. The Core Strategy recognises that the borough is made up of a number of broad character areas, each with their own distinctive character, created by many elements including style and layout, history and mix of uses. The borough has a unique and rich architectural heritage with many special places and buildings from many different eras in Camden's history. We therefore have a duty to respect these areas and buildings and, where possible, enhance them, when constructing new buildings and in alterations and extensions.
- 4.8 Preferred Policy DP19 contributes to implementing CS8 by setting out our detailed approach to alterations and extensions. Alterations and extensions can allow buildings to be enlarged, adapted and used more flexibly and help to make more efficient use of Camden's scarce land. The densely built nature of Camden and its many high quality places means that alterations and extensions in the borough need to be sensitively designed so they do not harm the amenity of neighbours, the appearance of buildings or the character of their surrounding area.

Preferred Policy DP19: Alterations and extensions

The Council will ensure that alterations and extensions make a positive contribution to the existing building and its surrounding area, and will expect:

- the form, proportions and character of the building and its setting to be respected;
- extensions to be subordinate to the original building in terms of scale and situation;
- original features to be retained;
- high quality materials to be used;
- unsympathetic alterations to be improved or removed;
- the architectural integrity of existing buildings to be preserved; and
- building services equipment to be appropriately located.

- 4.9 The Council seeks to accommodate the necessary levels of change to the built environment to meet the needs of Camden's residents and support Camden's continued vitality and prosperity, while ensuring the preservation of the borough's rich historic and architectural heritage. Alterations and extensions should respect the form, proportions and character of the surrounding area and respect the setting of the building, including any trees, garden or other amenity space. They should be carefully sited and proportioned in order to respect the integrity and proportions of the original building and the amenities of adjoining occupiers.
- 4.10 Development should not undermine any existing uniformity of a street. Overly large extensions can disfigure a building and upset its proportions. Insensitive extensions can also be a problem, for example, a side extension that occupies the space between semi-detached houses that form a group, or a rear extension to a property in an otherwise unspoilt group, which would detract from the uniformity of the rear elevation. Past alterations or extensions to surrounding properties should not necessarily be regarded as a precedent for subsequent proposals for alterations or extensions.

- 4.11 Alterations and extensions should be carried out in materials which match the original building, or, where appropriate, in materials that complement or enhance a building. Architectural features, such as cornices, mouldings, architraves, porches and chimneys should be retained wherever possible, as their loss can harm a building by altering its scale and proportions. The insensitive replacement of windows and doors and the cladding and painting of masonry can also spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group. Building services equipment (such as air cooling, heating, ventilation and extraction systems, lift and mechanical equipment, as well as fire escapes, ancillary plant and ducting) should be contained within the envelope of a building, or be located in a visually inconspicuous position and complement the design of the overall building.
- 4.12 The Council's approach to applications relating to conservation areas and listed buildings is set out in the Camden's Core Strategy (Preferred Approach CS8). In order to best preserve and enhance the positive elements of local character within the borough, we need to recognise and understand the factors that create it. We have prepared a series of Conservation Area Statements, Appraisals and Management Plans which describe the character and appearance of individual conservation areas and set out how the Council believes each can be conserved and enhanced. We will take these into account when assessing development proposals in conservation areas. They also provide a useful guide for local residents, community groups, businesses and developers on the design of development proposals and changes to buildings in conservation areas.

Key references/evidence

- Planning Policy Guidance 15 – Planning and the Historic Environment
- The London Plan (consolidated with alterations since 2004); Mayor of London; 2008

ALTERNATIVE OPTIONS

- 4.13 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Allowing developments that would not preserve or enhance the special character or appearance of the area or building, provided that other priorities are met.	This approach would be contrary to guidance contained within Planning Policy Guidance 15 – Planning and the Historic Environment which states that fundamental to the government's policies for environmental stewardship is the effective protection of all aspects of the historic environment. This option also performed less well in the Sustainability Appraisal than the preferred option as it would have a negative effect upon the protection of townscape quality and conservation areas by introducing less stringent controls on their protection.

Basements and lightwells

- 4.14 The Core Strategy Preferred Approach CS8 outlines our overall strategy to promoting high quality places. It seeks to secure development of the highest standard of design which respects local context and character. Preferred policy DP20 helps to deliver this by setting out our detailed approach to basements and lightwells. With a shortage of development land and high land values in the borough, the development of basements is becoming increasingly popular as a method of gaining additional space in homes without having to relocate to larger premises. Basement development is often also included in developments in the Central London part of Camden and is used for various purposes including commercial, retail and leisure uses, servicing and storage.

Preferred Policy DP20: Basements and lightwells

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability. The Council will only grant planning permission for basement and other underground development that:

- does not harm the amenity of neighbours;
- ensures the structural stability of neighbouring properties;
- does not adversely affect drainage and run-off or cause other damage to the water environment;
- does not lead to the loss of open space or trees (of townscape or amenity value);
- does not harm the appearance or setting of the property or the established character of the surrounding area;
- has regard to underground and adjacent service infrastructure;
- protects important archaeological remains (in accordance with DP22);
- provides satisfactory landscaping, including adequate soil depth;
- does not include habitable rooms and other sensitive uses in areas prone to flooding; and
- considers the cumulative impact of such development in the local area.

In determining applications for lightwells, the Council will consider whether:

- the architectural character of the building is protected;
- the character and appearance of the surrounding area is harmed; and
- the development results in the loss of more than 50% of the front garden or amenity area.

- 4.15 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment. The Council will therefore require hydrological and structural reports to be submitted as part of planning applications addressing the impact of the proposal on the application site and its surroundings. Such studies should be carried out by independent professionals (e.g. Chartered Structural Engineers).

- 4.16 Government Planning Policy Statement (PPS) 25 – **Development and Flood Risk** states that inappropriate development should be avoided in areas at risk of flooding and categorises basement dwellings as “highly vulnerable” to flooding. The Council will not allow the use of basements and other underground structures for habitable rooms and other sensitive uses in areas at risk of flooding. No parts of the borough that are currently identified by the Environment Agency as being prone to flooding from waterways. However, our Strategic Flood Risk Assessment identified some areas, particularly West Hampstead, as being subject to localised surface water flooding. Please see Core Strategy Preferred Approach CS5 – **Tackling climate change and promoting higher environmental standards** for more on the location of these areas and our approach to flooding. The Council will require the submission of a site-specific flood risk assessment with any application for a basement on streets identified as being at flood risk, in line with the criteria set out in PPS25.
- 4.17 Some parts of Camden, particularly areas around Hampstead Heath, contain unusual and unstable subsoils, along with many underground streams and watercourses, making drainage and structural safety key concerns. Basement developments will therefore be required to include drainage systems which are capable of allowing groundwater flows to bypass the structure without causing any unacceptable change in groundwater levels or flow in groundwater-fed streams, ditches or springs.
- 4.18 The use of sustainable urban drainage systems (SUDS) will be encouraged in all basement developments that extend beyond the profile of the original building. For basement development that consumes more than 50% of the garden space, and is considered otherwise to be acceptable, the use of SUDS will be required to mitigate any harm to the water environment. Further guidance on sustainable urban drainage is contained within Preferred Policy DP11 (Water).
- 4.19 Many potential impacts to the amenity of adjoining neighbours are limited by underground development. However, the demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basement development. The Council will seek to minimise the disruption caused by basement development and will require Construction Management Plans to be submitted with applications. Please see our Camden Planning Guidance supplementary document for further information on Construction Management Plans.
- 4.20 When considering applications for basement extensions the Council will need to be satisfied that effective measures will be taken during excavation, demolition and construction works to ensure that structural damage is not caused to the subject building and any nearby properties. In addition, the Council will require basement developments to have regard to infrastructure, both adjacent and underground, such as those relating to transportation or services within the borough.
- 4.21 A basement development that does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level (approximately 3 metres in depth) is often the most appropriate way to extend a building below ground. Proposals for basement development that take up the whole rear and/or front garden of a property are unlikely to be acceptable. Sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees. Developments should provide an appropriate proportion of planted material above the structure to mitigate the reduction in the natural storm water infiltration capacity of the site and/or the loss of biodiversity caused by the development. This will usually take the form of a soft landscaping or detention pond on the top of the underground structure, which is designed to temporarily hold a set amount of water while slowly draining to another location. It will be expected that a minimum of 0.5 metres of soil be provided above the basement development, where this extends beyond the footprint of the building, to enable garden planting.

- 4.22 Consideration should also be given to the existence of trees on or adjacent to the site, including street trees, and the root protection zones need by these trees. Where there are trees on or adjacent to the site, the Council will require an arboriculture report to be submitted as part of a planning application.
- 4.23 Many other policies in this Development Policies document and Camden's Core Strategy are relevant to basement development and will be taken into account when assessing such schemes, for example Core Strategy Preferred Approach CS5 – **Tackling climate change and promoting higher environmental standards**, CS8 – **Promoting high quality places** and CS9 – **Improving and protecting open spaces and encouraging biodiversity**, and Development Policies DP10 – **Promoting sustainable design and construction**, DP12 – **Water**, DP19 – **Alterations and extensions**, and DP21 – **Archaeology**.

Key references/evidence

- North London Strategic Flood Risk Assessment, Mouchel; 2008
- Floods in Camden – Report of the Floods Scrutiny Panel; London Borough of Camden; June 2003
- Planning Policy Statement 9: Biodiversity and Geological Conservation
- Planning Policy Statement 25: Development and Flood Risk

ALTERNATIVE OPTIONS

- 4.24 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not expect basement developments to incorporate green roofs or soft landscaping above.	This option performed less well in the Sustainability Appraisal than the alternative of requiring basement developments to incorporate green roofs, as it would miss the opportunity to provide sustainable methods of drainage and create new habitats. This option would therefore be contrary to guidance contained within PPS 9: Biodiversity and Geological Conservation and PPS 25: Development and Flood Risk.
Do not require the retention of garden space around a basement development to accommodate tree growth, biodiversity and water permeability.	This option performed poorly in the Sustainability Appraisal as it would fail to retain existing garden space, which provides sustainable drainage methods, and miss opportunities for the creation of new habitats and to contribute to air quality enhancement. This option would therefore be contrary to various national and regional planning guidance documents, including PPS 1: Delivering Sustainable Development and the London Plan, PPS 9: Biodiversity and Geological Conservation and PPS 25: Development and Flood Risk.

Alternative option	Reason option was not chosen
Require adequate mitigation measures for certain uses (e.g. essential power generators or children's playspace) to be proposed.	This option performed equally as well in the Sustainability Appraisal as the Preferred Option of not providing more sensitive uses within areas prone to flooding. The preferred option was selected because it would totally remove the risk to these uses, rather than merely mitigate against the impact, and is considered consistent with PPS25.
Do not influence what basements can be used for in areas prone to flooding or require mitigation measures for certain uses	This option performed badly in the Sustainability Appraisal as it does not take into account potential flood risk in the borough. This option would therefore be contrary to the guidance contained within PPS25: Development and Flood Risk.

Archaeology

- 4.25 Camden has a rich and generally well-preserved architectural heritage which, in addition to listed properties and historic squares and parks, includes the following 13 archaeological priority areas (as shown on Map 3):

- | | | |
|--------------------|--------------|------------------------|
| 1. Hampstead Heath | 6. Hampstead | 11. Highgate |
| 2. London Suburbs | 7. South End | 12. Bagnigge Wells |
| 3. St Pancras | 8. West End | 13. Canalside Industry |
| 4. Kentish Town | 9. Kilburn | |
| 5. Battle Bridge | 10. Belsize | |

- 4.26 Core Strategy Preferred Approach CS8 – **Promoting high quality places** seeks to ensure that Camden's places and buildings are attractive, safe and easy to use. Part of this strategy is to protect the borough's archaeological sites and monuments. Preferred Policy DP21 provides our detailed approach to protecting our archaeological heritage.

Preferred Policy DP21: Archaeology

The Council will aim to preserve sites and monuments of archaeological importance by ensuring acceptable measures are taken to preserve remains of archaeological importance and their setting, including physical preservation where appropriate.

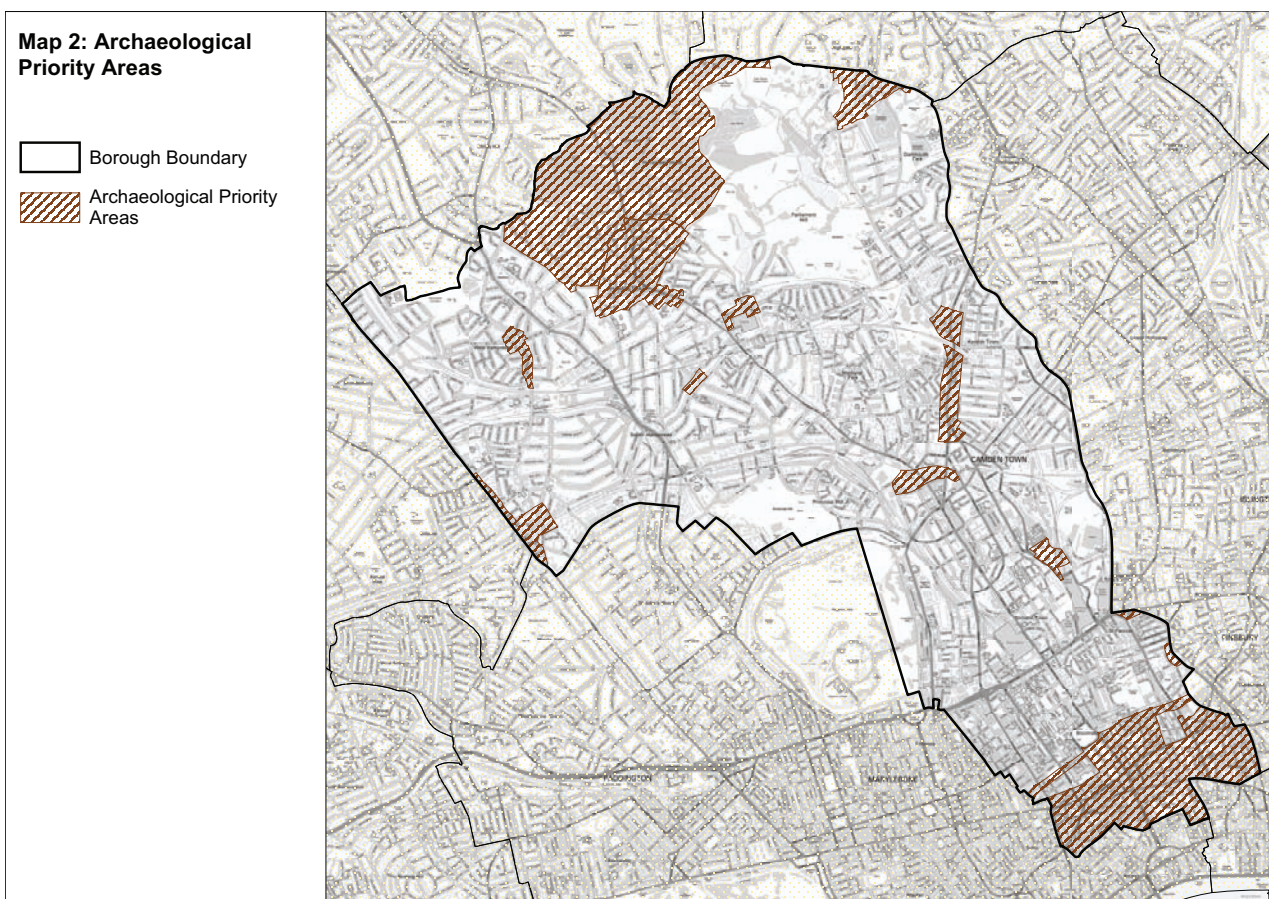
- 4.27 Camden's archaeological heritage is vulnerable to modern development and land use. In addition to the areas listed above, there is currently one scheduled ancient monument in the borough: Boadicea's Grave, a mound on Hampstead Heath. However, not all sites and monuments of

national importance meriting preservation are necessarily scheduled. Also, many archaeological remains are below ground and have yet to be discovered, so their extent and significance is not known. There is considerable likelihood that archaeological remains will be found in the borough, both within and outside of the defined Archaeological Priority Areas.

- 4.28 When researching the development potential of a site, developers should, in all cases, assess whether the site is known or likely to contain archaeological remains. Where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field evaluation. Scheduled monument consent must be obtained before any alterations are made to scheduled ancient monuments.
- 4.29 If important archaeological remains are found, the Council will seek to resist development which adversely affects remains and to minimise the impact of development schemes by requiring either in situ preservation or a programme of excavation and recording of remains. There will usually be a presumption in favour of in situ preservation of remains, and if important archaeological remains are found, measures should be adopted to allow the remains to be permanently preserved in situ. Where in situ preservation is not be feasible, no development shall take place until satisfactory excavation and recording of the remains have been carried out on site by an archaeological organisation approved by the Council.
- 4.30 The Council will consult with, and be guided by, English Heritage on the archaeological implications of development proposals. The Greater London Sites and Monuments Record, maintained by English Heritage, contains further information on archaeological sites in Camden. When considering schemes involving archaeological remains, the Council will also have regard to government Planning Policy Guidance (PPS) 16 – **Archaeology and planning**.

Key references/evidence

- Planning Policy Guidance 15 – Planning and the Historic Environment
- Planning Policy Guidance 16 – Archaeology and Planning
- The London Plan (consolidated with alterations since 2004); Mayor of London; 2008



ALTERNATIVE OPTIONS

- 4.31 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Requiring archaeological assessments for all development proposals within archaeological priority areas.	It is considered that it is unreasonable to expect all development proposals within archaeological priority areas to provide an archaeological assessment. This would go beyond the archaeological assessment requirements contained within Planning Policy Guidance 16 – Archaeology and Planning.
Not seeking physical preservation of archaeological features when a development is close to a site of archaeological importance.	This option would also be contrary to PPG16 which states that development plans should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings. It performed less well in the Sustainability Appraisal than the alternative of seeking physical preservation of archaeological features as it would mean that in some cases archaeological features may be overlooked and negatively affected.

Provision of, and improvements to, public open space, sport and recreation facilities

- 4.32 Public open space, sport and recreation facilities are of great importance in Camden in terms of health, play, regeneration, the economy, culture, biodiversity and in providing breaks in our built up area. Our open spaces include parks, natural green spaces, play spaces, outdoor sport and recreation facilities and allotments; while sports and recreation facilities include sports halls, swimming pools and tennis courts. The borough has over 250 designated parks and open spaces, ranging from local play areas to Hampstead Heath. However, parts of the borough have low levels of open space provision and opportunities for additional open space are limited.
- 4.33 Camden Core Strategy Preferred Approach CS9 protects Camden's limited open space and seeks to secure additional open space and improvements to existing open space. Core Strategy Preferred Approach CS10 supports the provision of community facilities including open space and sports and leisure facilities. Preferred Policy DP22 gives further detail on how the Council will secure this provision and improvements to open space sport and recreation facilities.

Preferred Policy DP22: Provision of, and improvements to, open space, sport and recreation facilities

To improve the quantity and quality of open space, sport and recreation facilities within Camden and ensure that any deficiencies are not made worse, the Council will require development that is likely to increase the demand for such uses to provide an appropriate contribution towards the supply of public open space, sport and recreation facilities based on the findings of the Camden Open Space, Sport and Recreation Study Update 2008.

- 4.34 The Camden Open Space, Sport and Recreation Study Update 2008 found that Camden has 17sqm of open space per person, applying the method outlined in Planning Policy Guidance 17: **Planning for open space, sport and recreation**. When applying PPG17, parts of the borough that do not have access to 17sqm of open space could be considered deficient in open space provision. However, there are large discrepancies in the provision of open space across Camden, due to the presence of Hampstead Heath, Regents Park and Primrose Hill. When the amount of open space is averaged out for the areas without a large park there is approximately 9sqm of open space per person in the borough. The Council will therefore apply a standard of 9 sq m per person when assessing appropriate contributions to open space and sport and recreation facilities from residential developments. As a guide, 2.5sqm of this should be in the form of child playspace and 4.5sqm should be natural green space. Where possible new allotments or community gardens should be provided. We will also seek a contribution towards sport and recreation facilities from developments that increase the demand for such uses. We have identified particular potential to upgrade existing sports hall facilities and tennis courts.
- 4.35 Camden's Central London area experiences additional pressure on its limited open space from the substantial number of people who work in the area. The Camden Open Space, Sport and Recreation Study Update 2008 found that there is 0.74sqm of open space per worker within Central London. The Council will therefore apply a standard of 0.74sq m per person when assessing appropriate contributions to open space and sport and recreation facilities from commercial developments in Central London. We will consider 19sqm of commercial floorspace as catering for one worker.

- 4.36 All developments that increase the demand for public open space, sport and recreation facilities will be expected to make an appropriate contribution to meeting that additional demand. Schemes considered to increase the demand for public open space, sport and recreation are:
- schemes of 5 or more dwellings;
 - student housing schemes creating 10 or more units/rooms;
 - developments of 500sqm or more of floorspace that are likely to increase the resident, worker or visitor populations of the borough.
- 4.37 Large schemes will be expected to meet some or all of the increased demand for open space they generate on-site. As a guide, the Council will consider schemes of 60 dwellings or 30,000 sq m of floorspace as capable of providing open space and play facilities on-site, based on the findings of the Camden Open Space, Sport and Recreation Study Update 2008. We will expect on-site open space to be incorporated from the initial layout and design stage to ensure its inclusion in development proposals. The Council's priority for on-site provision will be children and young people's play and informal recreation facilities and provision for residents, where these are appropriate. Further details on the type of open space sought is set out in the Council's Camden Planning Guidance supplementary document.
- 4.38 Many developments sites will be too small to provide open space on-site. Where this is the case, developments should provide an appropriate financial contribution towards improving existing open space, sport and recreation facilities. When assessing the level of contribution, the Council will also take into account any contribution made by private amenity space, private open space and other land (although such provision is not considered a substitute for public open space). Please see Camden Planning Guidance for further details on our approach to open space contributions.
- 4.39 The Council will seek opportunities to bring private open space into public use and for development sites adjacent to existing open space to increase the size of the open space, where practicable. We are especially keen to secure vacant land as open space for nature conservation use.

Key references/evidence

- Camden Open Space, Sport and Recreation Study Update; Atkins; 2008
- Planning Policy Guidance (PPG) 17 : Planning for open space, sport and recreation; ODPM; 2004
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Supplementary Planning Guidance: Providing for Children and Young People's Play and Informal Recreation; Mayor of London; 2008.

ALTERNATIVE OPTIONS

- 4.40 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a detailed summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not require developments that are likely to increase demand for play space to provide such facilities	IPPG17 and the London Plan and its supporting SPG on Providing for Children and Young people's play and informal recreation encourage the provision for play space and therefore this option would be contrary to national and regional guidance. This option did not perform as well as the Council's preferred option in the Sustainability Appraisal as it would not have benefits for health, access to local facilities and social inclusion.
Include distance thresholds for open space deficiency areas.	PPG 17 recommends the inclusion of distance standard in the determination of deficiency in access to open space, and distance standards are set out in the London Plan. In Camden, very few opportunities arise to provide additional open space on-site to decrease deficiencies and reduce the distance people need to travel to access open space. This option would not reduce deficiency in Camden and, due to a lack of nearby open spaces, would potentially lead to developments in deficiency areas providing financial contributions to improve open space in non-deficient areas.

5 Improving the quality of life of Camden's communities

- 5.1 The growth of Camden's population needs to be accompanied by the facilities and level of amenity needed to ensure a good quality of life for the borough's residents, workers and visitors. The section in our Core Strategy on Improving the Quality of life of Camden's communities focuses on:
- securing the provision of, and access to, community and recreational facilities to meet the needs of residents, workers and visitors and seeking to prevent the loss of existing facilities (Preferred Option CS10);
 - improving health and well-being (CS11);
 - promoting measures to make Camden a safer place while retaining its vibrancy (CS12);
 - making sure buildings, streets and transport systems are as accessible as possible and do not act as barriers to people accessing facilities and opportunities (CS13);
 - protecting and improving amenity and quality of life (CS14).
- 5.2 This section of our Development Policies provides the detailed planning policies to help deliver the overall approach to improving quality of life in Camden set out in Core Strategy. It focuses on supporting community facilities and services; managing the impact of development on occupiers and neighbours; managing noise and vibration; and our Clear Zone region.
- WHAT YOU TOLD US**
- 5.3 Only one organisation submitted comments on issues and options for Development Policies on improving the quality of life in Camden. However, a number of comments were submitted on this matter during consultation on issues and options for the Core Strategy. Key messages from this included
- general support for measures to promote equality of opportunity, reduce crime and disorder and promote health and well-being;
 - support for a stronger commitment to reducing noise pollution in the borough, in particular in Central London;
 - the need for schools, particularly a new school in the south of the borough.
- 5.4 The Development Policies Issues and Options Consultation Statement contains a summary of the comments we received and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on improving quality of life in Camden during consultation on issues and options for the Core Strategy.

Community and leisure uses

- 5.5 Community facilities provide people with opportunities to meet, learn, socialise and develop skills and interests and help improve their quality of life. 'Community facilities' include childcare facilities, all educational services and training facilities, healthcare, children's play and recreation, libraries, sports and leisure facilities, community halls, meeting rooms, places of worship and public conveniences.
- 5.6 Camden's Core Strategy Preferred Approach CS10 – Supporting community facilities and services, sets out our overarching approach to providing facilities and services that meet the needs of Camden's growing population. Preferred Policy DP23 helps to deliver this by setting out

our detailed approach to encouraging and protecting a range of community facilities. (See Preferred Policy DP22 for our detailed approach on the provision of open space, sports and recreation facilities.)

Preferred Policy DP23 – Community and leisure uses

The Council will support the retention and development of community and leisure uses in suitable locations.

Existing community facilities will be protected for the use and benefit of Camden's community. The Council will resist the loss of community uses, unless:

- a replacement facility, that suits current and future needs, is provided in an appropriate location; or
- the specific community use is no longer required in its current use and evidence can be provided to show that there is no demand for another suitable community use on the site.

New community uses must be:

- close or accessible to the community they serve
- accessible by a range of transport modes including walking, cycling and public transport –
- provided in buildings which are flexible and adaptable.

Where new developments result in the additional need for community facilities they will be expected to contribute towards supporting existing, or providing for new, facilities. Educational facilities will be expected to allow for the dual use of facilities and playing fields for wider community use outside of normal school hours;

New developments that have displaced community facilities will be encouraged to make facilities available for local community groups where appropriate.

Existing leisure uses will be protected for their contribution to the social and communal well-being of Camden's residents. The Council will resist the loss of leisure uses, unless:

- an adequate replacement facility will be provided in a location accessible to the users of the facility;
- the loss would not create, or add to, a shortfall in provision for the specific leisure use;
- the specific leisure facility is no longer required and it can be demonstrated that there is no demand for a suitable alternative leisure use of the site.

The Council will resist the loss of premises that are suitable for continued theatre use.

New leisure uses should be located in the Central London Area or in the Town Centres of Camden Town, Swiss Cottage/Finchley Road, Kilburn, West Hampstead or Kentish Town.

- 5.7 It is important that Camden's community facilities are located close to the people who use them. Locating these facilities where they are easily reached by a choice of means of transport, particularly walking, cycling and public transport will enable as many people as possible to have access to them. Central London and our town centres are appropriate locations for community uses, particularly those that may attract large numbers of people, as they are generally easily reached by a range of means of transport. Smaller facilities which will attract people from a local

area should be located within their catchment area or where they are easily reached by the community they serve.

- 5.8 New developments can lead to increased pressure on Camden's existing community facilities and infrastructure, either cumulatively or individually. Where this is the case, the Council will expect developments to make a contribution to the provision of appropriate community facilities on-site or close to the development. Depending on the scale of the development, it may be appropriate to provide, or secure funding for, a new facility in its entirety or to seek contributions towards an existing facility. Where appropriate, the Council will require a contribution towards the running costs and maintenance of facilities and/or services. These measures will help to meet the increased demands on existing facilities which are likely to result from new developments.
- 5.9 The Council will allow the loss of a community facility if an adequate replacement is provided. The loss of a community facility may also be permitted if it is no longer needed and the applicant demonstrates that there are no relevant community organisations that have any interest in using the facility in question. For example, for applications involving places of worship the applicant should contact the Council's Faith Officer for information on local faith groups that may require meeting spaces.
- 5.10 Certain types of new development, particularly serviced offices, hotels and educational premises, could be suitable for occasional use by a range of local community groups. Where a community facility has been redeveloped to provide any of the above, the resulting development will be expected to allow community groups to access meeting rooms or conference facilities at a discounted rate.
- 5.11 Leisure activities can have an important role in enhancing an area by contributing to the mix of uses and by providing activity outside of working hours. We will therefore, protect existing leisure uses to prevent any further loss of facilities. We will also protect Camden's theatres by protecting theatres that are suitable for continued theatre use from being converted to another leisure use or any other use. Theatres contribute to the character and culture of Camden and to London as a whole.
- 5.12 New leisure uses should not harm residential amenity, the environment or transport network (please see chapter 3 for policies relating to amenity, the environment and transport). As well as being located in areas that are easily accessible by public transport, new leisure uses must also be consistent with their surrounding in terms of scale, character and mix of uses. Other than in the Central London area and the town centres detailed in the policy, an assessment of need must be carried out for all new leisure development.

Key references/evidence

- Planning Policy Statement 1: Delivering Sustainable Development
- Supplementary Planning Guidance: Planning for Equality and Diversity in London
- Camden's Children and Young People's Plan 2006-09
- Camden Pro Active Sports and Physical Activity Strategy 2008
- Quality of Life Strategy for Camden's Older Citizens 2004
- Camden's Serving Older People Strategy 2002

ALTERNATIVE OPTIONS

- 5.13 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not expect developments to provide a contribution towards new or existing community facilities	This option would increase pressure on existing community facilities and services as a growing population would be served by only current facilities rather than increased/improved provision. The Sustainability Appraisal found that this option would have a negative impact on health, access to facilities and social cohesion.

Managing the impact of development on occupiers and neighbours

- 5.14 Camden's Core Strategy seeks to sustainably manage growth so that it takes place in the most appropriate locations and meets our needs taking into account Camden's highly developed character. Promoting and protecting high standards of amenity is a key element in this and will be a major consideration when the Council assesses development proposals. Core Strategy Preferred Approach CS14 sets out our overall approach to protecting the amenity of Camden's residents, workers and visitors, a major factor in people's quality of life. Preferred policy DP24 contributes to the implementation of strategy set out in CS14 by making sure that the impact of a development on occupiers and neighbours is fully considered.

Preferred Policy DP24 – Managing the impact of development on occupiers and neighbours

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

- visual privacy and overlooking;
- overshadowing and outlook;
- sunlight, daylight and artificial light levels;
- noise and vibration levels;
- odour, fumes and dust;
- microclimate;
- the inclusion of appropriate attenuation measures.

We will also require developments to provide:

- an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- facilities for the storage, recycling and disposal of waste;
- facilities for bicycle storage; and
- outdoor space for private or communal amenity space, wherever practical.

5.15 Development should avoid harmful effects on the amenity of existing and future occupiers and to nearby properties. When assessing proposals the Council will take account the considerations set out in policy DP24. The Council's Camden Planning Guidance supplementary document contains detailed guidance on the elements of amenity. Detailed standards on noise and vibration are set out in Development Policy DP25.

5.16 Outdoor amenity space provides an important resource for residents, which is particularly important in Camden given the borough's dense urban environment. It can include private provision such as gardens, courtyards and balconies, as well as communal gardens and roof terraces. The Council will expect the provision of gardens in appropriate developments, and particularly in schemes providing larger homes suitable for families. However, we recognise that in many parts of the borough this will not be realistic or appropriate. In these locations, the provision of alternative outdoor amenity space, for example, balconies, roof gardens or communal space will be expected. These amenity spaces should be designed to limit noise and disturbance of other occupiers and so not to unacceptably reduce the privacy of other occupiers and neighbours.

ALTERNATIVE OPTIONS

5.17 No other options were considered as an alternative to managing the impact of development on occupiers and neighbours and none were suggested during consultation at the Issues and Options stage. The Council does not consider that there are reasonable alternatives to the proposed approach.

Noise and vibration

5.18 Noise and vibration can have a major effect on amenity and health and therefore the quality of life in general. Camden's high density and mixed-use nature means that disturbance from noise and vibration is a particularly important issue in the borough. Camden's Core Strategy recognises the importance of this issue for Camden's residents and preventing noise is a key component of Preferred Approaches CS11 – **Improving Camden's health and well-being** and CS14 – **Improving and protecting amenity**.

Preferred Policy DP25 – Noise and Vibration

The Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:

- development likely to generate noise pollution; or
- development sensitive to noise in locations with noise pollution,

unless appropriate attenuation measures are provided. Development that exceeds Camden's Noise and Vibration Thresholds will not be permitted.

The Council will only grant permission for plant or machinery if it can be operated without causing loss of amenity and does not exceed our noise thresholds.

The Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, planning conditions may be used to minimise the impact.

- 5.19 The effect of noise and vibration can be minimised by separating uses sensitive to noise from development that generates noise and by taking measures to reduce any impact. Noise sensitive development includes housing, schools and hospitals as well as offices, workshops and open spaces, while noise is generated by rail and road traffic, air traffic, industry, entertainment (e.g. nightclubs, restaurants and bars) and other uses.
- 5.20 The Council will only grant planning permission for development sensitive to noise in locations that experience noise pollution, and for development likely to generate noise pollution, if appropriate attenuation measures are taken, such as double-glazing. Planning permission will not be granted for development sensitive to noise in locations that have unacceptable levels of noise. Where uses sensitive to noise are proposed close to an existing source of noise or when development that generates noise is proposed, the Council will require an acoustic report to ensure compliance with PPG24: Planning and noise. A condition will be imposed to require that the plant and equipment which may be a source of noise pollution is kept working efficiently and within the required noise limits and time restrictions. Conditions may also be imposed to ensure that attenuation measures are kept in place and effective throughout the life of the development.
- 5.21 In assessing applications, the Council will have regard to Camden's Noise and Vibration Thresholds, set out below. These represent an interpretation of the standards in PPG24 and include an evening period, in addition to the day and night standards contained in the PPG, which provide a greater degree of control over noise and vibration during a period when noise is often an issue in the borough.

Table A: Noise levels on residential sites adjoining railways and roads at which planning permission will **NOT** be granted

Noise description and location of measurement	Period	Time	Sites adjoining railways	Sites adjoining roads
Noise at 1 metre external to a sensitive façade	Day	0700-1900	74 dB _{LAeq} 12h	72 dB _{LAeq} 12h
Noise at 1 metre external to a sensitive façade	Evening	1900-2300	74 dB _{LAeq} 4h	72 dB _{LAeq} 4h
Noise at 1 metre external to a sensitive façade	Night	2300-0700	66 dB _{LAeq} 8h	66 dB _{LAeq} 8h

Table B: Noise levels on residential streets adjoining railways and roads at and above which attenuation measures will be required

Noise description and location of measurement	Period	Time	Sites adjoining railways	Sites adjoining roads
Noise at 1 metre external to a sensitive façade	Day	0700-1900	65 dB _{LAeq} 12h	62 dB _{LAeq} 12h
Noise at 1 metre external to a sensitive façade	Evening	1900-2300	60 dB _{LAeq} 4h	57 dB _{LAeq} 4h
Noise at 1 metre external to a sensitive façade	Night	2300-0700	55 dB _{LAeq} 8h	52 dB _{LAeq} 1h
Individual noise events several times an hour	Night	2300-0700	>82 dB _{LAeq} 8h (S time weighting)	>82 dB _{LAeq} 8h (S time weighting)

Table C: Vibration levels on residential sites adjoining railways and roads at which planning permission will not be granted (BS 6472:1992)

Vibration description and location of measurement	Period	Time	Vibration levels
Vibration inside critical areas such as a hospital operating theatre	Day, evening and night	0000-2400	0.1 VDV ms ^{-1.75}
Vibration inside dwellings	Day and evening	0700-2300	0.2 to 0.4 VDV ms ^{-1.75}
Vibration inside dwellings	Night	2300-0700	0.13 VDV ms ^{-1.75}
Vibration inside offices	Day, evening and night	0000-2400	0.4 VDV ms ^{-1.75}
Vibration inside workshops	Day, evening and night	0000-2400	0.8 VDV ms ^{-1.75}

Where dwellings may be affected by ground-borne regenerated noise internally from, for example, railways or underground trains within tunnels, noise levels within the rooms should not be greater than 35dB(A)max

Table D: Noise levels from places of entertainment on adjoining residential sites at which planning permission will not be granted

Noise description and measurement location	Period	Time	Sites adjoining places of entertainment
Noise at 1 metre external to a sensitive façade	Day and evening	0700-2300	L_{Aeq} 5m shall not increase by more than 5dB*
Noise at 1 metre external to a sensitive façade	Night	2300-0700	L_{Aeq} 5m shall not increase by more than 3dB*
Noise inside any living room of any noise sensitive premises, with the windows open or closed	Night	2300-0700	L_{Aeq} 5m (in the 63Hz Octave band measured using the 'fast' time constant) should show no increase in dB*

* As compared to the same measure, from the same position, and over a comparable period, with no entertainment taking place

Table E: Noise levels from plant and machinery at which planning permission will not be granted

Noise description and location of measurement	Period	Time	Noise level
Noise at 1 metre external to a sensitive façade	Day, evening and night	0000-2400	5dB(A) <LA90
Noise that has a distinguishable discrete continuous note (whine, hiss, screech, hum) at 1 metre external to a sensitive façade.	Day, evening and night	0000-2400	10dB(A) <LA90
Noise that has distinct impulses (bangs, clicks, clatters, thumps) at 1 metre external to a sensitive façade.	Day, evening and night	0000-2400	10dB(A) <LA90
Noise at 1 metre external to sensitive façade where LA90>60dB	Day, evening and night	0000-2400	55dBL L_{Aeq}

Key references/evidence

- Camden's Noise Strategy, 2002
- The London Plan (Consolidated with Alterations since 2004), 2008
- Planning Policy Guidance 24: Planning and noise

ALTERNATIVE OPTIONS

- 5.22 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Strengthen the standards on noise with regards to noise creep; noise levels; and/or frequencies

This option performed well in the Sustainability Appraisal in terms of noise reduction. However, it was felt that stricter standards would have a negative impact on housing provision by making some locations unacceptable for housing, or by making housing development too costly once noise reduction measures are included. There would be similar implications for employment uses and the additional cost could prevent the re-use of land and may not result in the most efficient use of land. By limiting growth in homes and jobs this option could be seen to be contrary to the London Plan. Camden's noise and vibration standards represent an interpretation of those contained within PPG24 and go beyond these to introduce an 'evening' period, rather than just day or night, providing a greater level of control over noise and vibration.

Clear zone

- 5.23 Core Strategy Preferred Approach CS3 – **Central London** sets out the Council's approach to promoting the Central London area of Camden as a successful and vibrant part of the capital. Part of this is the continuing designation of Central London as a Clear Zone region to reduce congestion, promote walking and cycling and improve air quality. Preferred Policy DC26 contributes towards delivering this element of CS3 and towards the delivery of Core Strategy Preferred Approach CS7 – **Reducing the environmental impact of travel**, which sets out our approach to sustainable transport.

Preferred Policy DC26 – Clear Zone

The Council will only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated. We will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area.

- 5.24 Camden has been a leading council in the development of policies and initiatives to reduce the impact of transport on the environment. We are the lead borough in the Clear Zone Partnership with the City of Westminster; and the Corporation of London, which covers the Central London part of Camden. The Clear Zone partnership aims to reduce congestion, noise and air pollution; encourage a shift to walking, cycling and public transport; and improve the urban realm. It uses partnership working, innovative technologies and sustainable transport measures to achieve these aims.

5.25 The objectives of the Clear Zone region are to:

- reduce congestion and pollution through piloting sustainable transport measures and innovative technologies;
- improving air quality;
- reduce noise pollution;
- improve accessibility and mobility for walking, cycling and public transport;
- improve our streets, places and open spaces;
- make it easier for people to find their way around through installing pedestrian and cycling signage systems;
- encourage cycling by promoting secure cycle stations and city bike hire schemes;
- promote car-free and traffic-reduced areas and developments, complemented by car clubs;
- reduce the amount of through traffic;
- promote good management in development schemes through construction, servicing and waste management plans;
- promote alternatively fuelled and low emission vehicles for freight distribution and servicing.

5.26 More detail on the Clear Zone and the types of measures we will promote within it, such as travel plans, car clubs, construction, servicing and waste management plans, pedestrian and cycle facilities, is set out in the Council's Camden Planning Guidance supplementary document.

Key references/evidence

- Camden Local Implementation Plan (LIP) 2005/06 – 2010/11
- Draft Camden Green Transport Strategy 2006 – 2012
- Planning Policy Guidance (PPG) 13: Transport; ODPM; 2001

ALTERNATIVE OPTIONS

5.27 No other options were considered as an alternative to the minimisation of transport impacts in the central London area and none were suggested during consultation at the Issues and Options stage. The Council believes that there are no reasonable alternatives to the proposed approach.

6 Securing a strong economy that includes everybody

- 6.1 One of the four themes of Camden's Community Strategy is **A strong Camden economy that includes everyone**. This aims to make sure that Camden becomes an even better location for business, to increase local business activity, including support for local shops, and make sure that more Camden residents, especially young people, will have the skills, education and training to take part in the job market.
- 6.2 Camden's Core Strategy Preferred Approach CS15 – **Promoting a successful and inclusive Camden economy** seeks to deliver this by setting out our strategy on promoting a successful and inclusive Camden economy. This includes
- supporting a diverse range of economically beneficial uses in appropriate locations;
 - supporting businesses by safeguarding existing employment sites and premises, including the borough's main Industry Area;
 - securing a concentration of office growth at King's Cross with further provision in other growth areas, Central London and other appropriate locations;
 - encouraging a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises;
 - supporting local enterprise development and training schemes for Camden residents.
- 6.3 The Core Strategy also sets our overarching approach to town centres and shop, food, drink and entertainment uses. Preferred Approach CS16 – Promoting our town centres and shops seeks to promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors by:
- supporting our town centres, Central London Frontages and neighbourhood centres and promoting a range of shops, services, food, drink and entertainment and other suitable uses in them;
 - concentrating new retail development at King's Cross with some additional retail in existing centres and in the growth areas at Tottenham Court Road, Euston, Holborn and West Hampstead;
 - taking into account the unique character, role and size of each of Camden's centres;
 - resisting the loss of shops where this would cause harm to a centre and using our available powers to protect local shops;
 - minimising the impact of food, drink, entertainment and other town centre uses;
 - seeking to improve Camden's centres through environmental, design, transport and public safety measures;
 - supporting and protecting Camden's markets and areas of specialist shopping.
- 6.4 The section below provides detailed planning policies where these are necessary to achieve the approach to securing a strong Camden economy set out in our Core Strategy.

WHAT YOU TOLD US ABOUT SECURING A STRONG ECONOMY THAT INCLUDES EVERYBODY

- 6.5 The main points raised on securing a strong economy during consultation on issues and options for the Development Policies are summarised below.
- Flexible and affordable workspace is important for local businesses and there is potential for new developments to provide for some of this space.
 - It is important that new workspace for small businesses is effectively managed and supported. A number of sites were suggested for new workspaces.

- There are unique employment areas in the borough that need to be protected.
- Live/work units should only be allowed in specific circumstances and it will be important to ensure that live/work units are not converted solely to housing.
- There was general consensus that a mix of uses is important to enhance the vitality and viability of our centres, however there was no consensus with regard to which uses should be encouraged or discouraged.
- Private sector companies felt that a range of activities should be encouraged in town centres, including food, drink and entertainment uses.
- The Council should provide protection for shops and have planning policies to retain and promote Camden's market.
- There was no consensus as to whether food, drink and entertainment uses should be concentrated in certain areas or spread out.

6.6 The Development Policies Issues and Options Consultation Statement contains a summary of the comments we received on this matter and the Council's response to them. Please also see the Core Strategy Preferred Option document for a summary of comments made on Camden's economy during consultation on issues and options for the Core Strategy.

Employment premises and sites

- 6.7 Having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden's economy. An increase in the number and diversity of employment opportunities is fundamental to improving London's competitiveness. The Council wants to encourage the development of a broad economic base in the borough to help meet the varied employment needs, skills and qualifications of Camden's workforce.
- 6.8 Camden Core Strategy Preferred Approach CS15 – Promoting a successful and inclusive Camden economy sets out our overall strategy for Camden's economy. It aims to make sure that the borough's economy will be stronger and more diverse while providing more Camden residents with the skills, education and training to take up local job opportunities. Preferred Policy DP27 contributes towards delivering this strategy by providing our detailed approach to employment sites and premises.

Preferred Policy: DP27 – Employment premises and sites

The Council will retain land and buildings that are suitable for business use and will resist a change to non-business use.

Where it has been demonstrated to the Council's satisfaction that a site is no longer suitable for its existing business use, and there is evidence that the possibility of reusing or redeveloping the site for similar or alternative business use has been fully explored over a period of time, preference will be given to maintaining a business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses.

When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses.

The Council will grant planning permission for mixed use developments on employment sites provided that:

- the level of employment floorspace is maintained or increased;
- premises suitable for micro, small or medium enterprises are provided;
- where the site has been used for light industry, industry, warehousing (in use classes B1a, B2, B8 or sui generis uses of a similar nature) or for offices in premises that are suitable for other business uses, floorspace suitable for either light industrial, industry or warehousing uses is re-provided;
- the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.

6.9 As part of our aim to maintain a range of business uses to match the needs, skills and qualifications of the borough's workforce and provide economic diversity, the Council will seek to retain land and buildings that are currently suitable, or have the potential to remain suitable, either through redevelopment or alteration, for business use, and will resist a change to non-business uses. This approach is especially important given the limited supply of business premises other than offices in Camden.

6.10 Where it is proposed to redevelop employment land for another business use, including offices, the Council will seek to retain features that will enable the flexible use of the premises for a range of business purposes. This will help to maintain the range of employment premises available and is especially important given the limited supply of non-office premises. The typical design features that enable flexible use are:

- clear and flexible space with few supporting columns;
- adequate floor to ceiling heights;
- wide doors/corridors;
- loading facilities;
- large amounts of natural light;
- availability of a range of units sizes;
- space for servicing by/parking of commercial vehicles.

6.11 When assessing proposals that involve the loss of a business use we will consider whether there is potential for that use to continue, taking into account whether the site:

- is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;
- is in a location suitable for a mix of uses including light industry and local distribution warehousing;
- is easily accessible to the Transport for London Road Network and/or London Distributor Roads;
- is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;
- has adequate on-site vehicle space for servicing;
- is well related to nearby land uses;
- is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards.

- 6.12 In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The property should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers. It may also be appropriate to contact the Council's Business Initiatives team, who can provide information on local businesses that are looking for premises.
- 6.13 Where proposals involve the redevelopment of employment sites to provide mixed use development, for example housing, retail and business uses, the Council will expect premises that can accommodate a range of business types and sizes (e.g. new businesses, small and medium sized enterprises (SMEs), creative businesses) to be provided. Applicants must demonstrate to the Council's satisfaction that the commercial element is appropriate to meet the likely needs of the end user. The provision of inappropriate business space will not be acceptable as this often fails to attract an occupier, which can lead to vacancy. Clear separation of the residential element and effective management of the business space will also be important. This is in line with the approach to flexible and affordable workspace that is taken in the Core Strategy Preferred Approach CS15 – **Promoting a successful and inclusive Camden economy**.
- 6.14 In the Hatton Garden area, the conversion of office premises will only be permitted where it can be demonstrated that they have been vacant and marketed for at least 2 years (see para above) and they are replaced by mixed use development that includes both housing and light industrial premises suitable for light industrial premises suitable for use as jewellery workshops. As a guideline, we will seek 50% of floorspace to be provided for jewellery workshops, taking into account the layout of the building. We will use planning obligations and conditions to ensure that premises are suitable for jewellery uses in terms of design, layout and affordability. Please also refer to Preferred Policy DP1 which has further information on mixed use development.
- 6.15 Throughout this section the terms 'business' and 'employment' are used to refer collectively to the following uses:
- offices, research and development, and light industry (Use Class B1);
 - general industrial uses (Use Class B2);
 - storage and distribution (warehousing) (Use Class B8);
 - other unclassified uses of similar nature to those above, such as depots or live/work (classed as sui generis).

Key references/evidence

- Camden Employment Land Review 2008
- Camden Business Survey 2004
- Demand for premises of London's SMEs; LDA 2006

ALTERNATIVE OPTIONS

- 6.16 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not protect employment uses

The Council considers that it is important to retain employment sites and premises to provide job opportunities for Camden residents and locations for local business. The preferred approach is considered to be consistent with the Mayor of London's Industrial Capacity Supplementary Planning Guidance which includes Camden in the "Restricted Transfer" category where boroughs are encouraged to adopt a more restrictive approach to the change of industrial sites to other uses. Although this option scored well in the Sustainability Appraisal in relation to housing provision, it performed poorly on some other indicators as it would allow the loss of employment uses and not encourage the retention of locally based industries, or allow for the expansion of small businesses. This in turn would not benefit the local economy and would allow a loss of employment opportunities for local people.

Protect all offices

The conversion of offices is significant in the supply of homes in Camden. As a result this option performed poorly in the Sustainability Appraisal as it would reduce the number of sites available for housing. It would also potentially limit opportunities for community facilities. The option performed positively in terms of encouraging economic growth, but this is not considered to outweigh its negative effect on housing provision. Our preferred approach will allow the conversion of older offices premises to permanent residential uses which will help to increase the provision of homes in the borough.

Local training schemes and enterprise development

- 6.17 Our Core Strategy identifies a mismatch between the acquired skills of Camden's local residents and the job opportunities available within the borough. Camden's Core Strategy Preferred Approach CS15 – **Promoting a successful and inclusive Camden economy**, includes measures to address this imbalance by implementing a range of schemes and initiatives that help to find local jobs for residents. Preferred Policy DP28 sets out our detailed approach to how developments will contribute to these initiatives.

Preferred Policy: DP28 – Local training schemes and enterprise development

The Council will seek to improve job opportunities in Camden by encouraging large developments to:

- support measures to train local people in the skills and qualifications required to access employment in the construction of, or in the end use phase of, the development;
- follow Camden's local procurement code of practice; and
- provide child care facilities.

LOCAL LABOUR AGREEMENTS

- 6.18 To ensure that local residents benefit from the employment opportunities created by the location and construction of larger developments in the borough, the Council will seek construction training and or local labour initiatives, through the developer or main contractor, on developments that are likely to be of sufficient scale to make such initiatives reasonably and practically possible on-site. This will normally apply to non-residential developments over 5,000 sq m or residential developments of over 50 units and where the construction period is over six months. Where the developer is unable to provide training places on site then we will seek to negotiate a financial contribution which will be used to support off-site training in the locality of the development.

USING LOCAL WORKERS

- 6.19 Developers and occupiers of new developments will be encouraged to recruit from Camden's resident population. This could be done by registering vacancies with the local job brokerage organisation, e.g. Job Centre or Camden Working, by advertising in the local press or running local recruitment events.

USING LOCAL SUPPLIERS

- 6.20 We will encourage developments to sign up to Camden's Local Procurement Code of Practice which encourages developers and larger contractors to share information about their supply requirements and sub-contracting opportunities with local businesses

CHILD CARE FACILITIES

- 6.21 The lack of child care facilities often prevents people from taking up employment opportunities or restricts them to part-time jobs that are close to home. The Council will therefore seek the provision of child care facilities in non-residential developments of over 1,000 square metres.

Key references/evidence

- Camden Employment Land Review 2008
- Demand for premises of London's SMEs; London Development Agency; 2006

ALTERNATIVE OPTIONS

- 6.22 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not encourage developers to recruit local people and use local businesses and suppliers during the construction of a scheme.	The Council considers it important to improve job opportunities for local people and support local business to allow them to share in Camden's economic success. This option was found to have a negative impact on local employment and locally based industries in the Sustainability Appraisal.

Live/work premises

- 6.23 Camden's Core Strategy Preferred Approach CS15 – **Promoting a successful and inclusive Camden economy**, encourages a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises. Preferred Policy DP29 sets out our detailed approach to live/work development.

Preferred Policy DP29 – Live/work premises

The Council will support the provision of live/work premises provided this does not:

- result in the loss of any permanent residential units; or
- result in the loss of sites in business or employment use where there is potential for that use to continue.

- 6.24 Many entrepreneurs start their businesses from home before they need to move into larger or more appropriate premises. Live/work premises, which provide segregated living and working accommodation in a single self-contained unit, can make a valuable contribution to the range of premises available to entrepreneurs, start-up businesses and the creative industries in Camden. They can provide a more flexible environment than working from home and can be more affordable than finding commercial premises. Live/work is distinct from working at home as it involves the provision of purpose designed workspace and does not fall within a specific planning use class. Consequently, planning permission will always be required for the change of use of any building or site to live/work premises.
- 6.25 Live/work premises will be most appropriate where they are specifically tailored to the requirements of an end user, for example an artist seeking combined studio space and living accommodation. Speculative live/work developments, however, will be difficult to provide, unless there is a specific group of end users that require this type of accommodation, e.g. live/work units that are related to Camden's higher education sector can offer affordable units to colleges and graduates.
- 6.26 When businesses need to move on to larger premises or cease trading, owners will frequently convert the entire live/work premises to use as housing, due to the relatively high value of residential property in the borough, meaning the workspace element is lost. Therefore it is important that live/work premises are carefully controlled. The Council will not normally allow live/work development where this would result in the loss of sites that can be retained in wholly business use. The circumstances where continued business use would be required are detailed in Preferred Policy DC29 above. Planning conditions or obligations will be used to secure an element of workspace within live/work premises to ensure that a suitable working environment is provided and retained.
- 6.27 We will also not allow live/work premises where it would involve the loss of any permanent housing units. Live/work units will be treated in the same way as housing for the operation of all other policies in this document and Camden's Core Strategy, including those on parking and the provision of affordable housing.
- 6.28 Developments of multiple live/work units will require careful management to ensure that they can become economically successful. Management could be provided by a housing association, a business support enterprise, academic/research institution or a private management company. Applicants should provide details of management arrangements for proposed live/work premises.

- 6.29 Working and living close together can also be achieved through mixed use developments. See Preferred Policy DC1 for more details on our approach to mixed use.

Key references/evidence

- 2008 Camden Employment Land Review
- 2006 'Demand for premises of London's SMEs' report LDA

ALTERNATIVE OPTIONS

- 6.30 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Permit live/work units even if it results in the loss of employment sites and/or residential units.	The benefits of live/work premises are not considered to outweigh the benefits of retaining existing housing, the priority land use of Camden's LDF, or dedicated employment premises, which the Council also seeks to protect. This option also performed poorly in the Sustainability Appraisal as it would potentially reduce the number of permanent homes or business premises.

Tourism development and visitor accommodation

- 6.31 Camden Core Strategy Preferred Approach CS15 – **Promoting a successful and inclusive Camden economy** sets out the Council's overall strategy for Camden's economy. It includes supporting the development of Camden's tourism sector and ensuring that new facilities are located in suitable, accessible locations. Preferred Policy DP30 sets out our detailed approach to tourism related development and visitor accommodation.

Preferred Policy DC30 – Tourism development and visitor accommodation

The Council will support tourism-related development and visitor accommodation where it:

- is easily reached by public transport;
- provides any necessary off-highway pickup and set down points for taxis and coaches;
- is located in the Central London area or the town centres of Camden Town, Kilburn, West Hampstead and Finchley Road/Swiss Cottage;
- does not harm residential amenity, the environment or transport systems.

The Council will not support the loss of existing hotels, B&Bs, youth hostels and serviced apartments that are located in appropriate locations, as listed above.

- 6.32 Camden has a wide variety of tourist attractions that range from cultural institutions, such as the British Museum and British Library; open spaces like Hampstead Heath and Primrose Hill; Camden Town markets and other shopping areas; and to historic places, such as Hampstead and Bloomsbury. These attractions experience high numbers of visitors throughout the year. It is therefore important to provide and maintain a range of accommodation in the borough for Camden's visitors.
- 6.33 Visitor accommodation (hotels, bed and breakfasts, youth hostels, backpacker's accommodation and serviced apartments) should be located in the Central London area or the town centres of Camden Town, Kilburn, West Hampstead and Finchley Road/Swiss Cottage where they can be easily reached by public transport. The parts of the borough outside of these locations are less well served by public transport, are in established residential areas or are other areas that are considered unsuitable for visitor accommodation. This approach is consistent with Core Strategy Preferred Approach CS1 which guides development that significantly increases travel demand to the most accessible parts of the borough.
- 6.34 Visitor accommodation can generate significant vehicle movements, particularly by taxi and coach. It should therefore include off-highway set down and pick up points for any taxis and coach visits they are likely to attract. Where it is not possible to provide for a suitable set down point for coaches, the Council may negotiate planning obligations with developers to prevent coach access to these sites.
- 6.35 Visitor accommodation should not lead to the loss of permanent residential accommodation. Permanent residential uses are dealt with in Core Strategy Preferred Approach CS4.
- 6.36 Large scale leisure and hotel developments employ a large number of people. New developments will be encouraged to provide training and employ Camden residents in line with the approach in Preferred Policy DP30.

Key references/evidence

- Camden Employment Land Review; 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Sustaining Success – the Mayor's Economic Development Strategy; 2005

ALTERNATIVE OPTIONS

- 6.37 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them

Alternative option	Reason option was not chosen
Encourage new or expanded tourism related development throughout the borough	It is important to balance the needs of Camden's visitors whilst protecting the interests of residents and the environmental character of the Borough. This option could allow tourism development in inappropriate areas of the borough. This option does not prioritise the areas in the borough that are appropriate locations for development that will significantly increase travel demand, such as the Central London area and town centres.

Managing the impact of food, drink, entertainment and other town centre uses

- 6.38 Camden Core Strategy Preferred Approach CS16 – Promoting our town centres and shops sets out the Council’s overall strategy for our centres and associated uses. It seeks to promote successful and vibrant centres, for example by:
- designating a hierarchy of town centres, Central London Frontages and neighbourhood centres;
 - concentrating new retail development at King’s Cross, with some additional retail in existing centres and in the growth areas at Tottenham Court Road, Euston, Holborn and West Hampstead;
 - taking into account the character, role and size of each of Camden’s centres; and
 - resisting the loss of shops where this would cause harm to the character and function of a centre or shopping provision in the local area.
- 6.39 CS16 also seeks to make sure that the impact of food, drink, entertainment and other town centre uses on residents and the local area is minimised. This is particularly important in Camden given the borough’s wide range of bars, restaurants and entertainment venues, which are concentrated in our centres and central London, areas with significant residential communities. Preferred Policy DP31 contributes towards the strategy set out in CS16 by providing our detailed approach to managing the impact of food, drink and entertainment uses and other uses suitable for centres so they do not cause harm to the quality of life of local people, the character of our centres and the surrounding area or to other uses and activities.

Preferred policy DP31 – Managing the impact of food, drink, entertainment and other town centre uses

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

- the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;
- the effect of non-retail development on shopping provision and the character of the centre in which it is located;
- parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- noise and vibration generated either inside or outside of the site;
- fumes likely to be generated and the potential for effective and unobtrusive ventilation;
- the potential for littering or anti-social behaviour;
- cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses.

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

- hours of operation;
- noise/vibration, fumes and the siting of plant and machinery;
- the storage and disposal of refuse and customer litter;
- tables and chairs outside of premises;
- opening frontages;
- the expansion of the customer area into ancillary areas such as basements;
- the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2).

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

- 6.40 A wide range of uses are considered suitable in our centres, subject to consideration of their impact. These primarily include, but are not limited to, shops and markets (Use Class A1), financial and professional services (A2), food and drink uses (A3, A4 and A5), offices (B1a), community and leisure uses (D1 and D2), nightclubs and a number of other uses not in any use class (see **Other town centre uses** below). Preferred Policy DC33 will be applied to proposals for all such uses, whether located inside or outside of a centre.
- 6.41 Shops, service, food, drink and entertainment uses can all have an impact on their surrounding area. These may include the diverting trade, displacing existing town centre functions, noise, cooking odours, traffic impacts and anti-social behaviour by customers. As a result, the Council will seek to guide such uses to locations where their impact can be minimised, and to use planning conditions or obligations to ensure that any remaining impact is controlled. When assessing proposals for these uses the Council will seek to protect the character and function of our centres and prevent any reduction in their vitality and viability. The Council not grant planning permission for development that it considers would cause harm to the character, amenity, function, vitality and viability of a centre or local area. We will consider the cumulative impact of additional shopping floorspace (whether in a centre or not) on the viability of other centres, and the cumulative impact of non-shopping uses on the character of the area.
- 6.42 The development of new shops or other town centre uses, particularly when they are large in scale, can have an impact on other centres. The Council considers that harm is caused when an impact is at an unacceptable level, in terms of trade/turnover; vitality and viability; the character, quality and attractiveness of a centre; levels of vacancy; the range of services provided; and a centre's character and role in the social and economic life of the local community.
- 6.43 In accordance with government guidance in Planning Policy Statement (PPS) 6 – **Planning for Town Centres**, the Council will require a retail impact assessment for any application for a main town centre use outside a centre or for significant developments inside a centre that would substantially increase the attraction of the centre and could have an impact on other centres. Impact assessments will be required for all retail and leisure developments over 2,500 square metres gross floorspace. They may also be sought for smaller developments where they may have a significant impact on other centres. The level of detail and type of evidence and analysis required should be proportionate to the scale and nature of the proposal. Please see PPS6 for further information on relevant matters to be addressed in retail impact assessments.

- 6.44 The Council has produced a series of area planning documents (for Camden Town, Central London, West Hampstead and Finchley Road/Swiss Cottage) which give more detailed guidance on how the Council will treat planning applications for shops, food, drink and entertainment uses in particular centres, taking into account their specific circumstances. We will take these, and any other relevant supplementary guidance, into account when we assess applications in these locations.

FOOD DRINK AND ENTERTAINMENT USES

- 6.45 Camden's image as a dynamic and attractive place is in part due to the number and quality of restaurants, bars and entertainment venues in the borough, with Camden Town and Covent Garden having a particular concentrations of such premises. These play an important part in the night time economy of Camden and of London, socially, economically and in terms of job provision. However, night-time activity can also lead to problems such as anti-social behaviour, fear of crime, noise, congestion and disturbance.
- 6.46 Conflicts can arise as, due to the borough's densely developed, mixed use nature, much night-time activity occurs close to places where people live. In addition, large numbers of such uses can change the character of the area in which they are located and reduce its range of shops or the quality of the shopping environment. Conflicts can be made worse where a particular location becomes a focus for late night activity. Therefore the Council will seek to prevent concentrations of uses that would harm an area's attractiveness to shoppers or its residential amenity. The Council wishes to see a wide range of entertainment uses within its centres, not just those that primarily involve drinking, and will encourage suitable uses that contribute towards this.
- 6.47 Food and drink uses, are most appropriately located in commercial areas, such as Central London Frontages and Town Centres, to minimise their impact on residential amenity. For food and drink or entertainment proposals involving late night opening, the availability of late night public transport will be a key consideration, as car parking in the borough is limited, and the excessive use of taxis and minicabs can cause noise disturbance.
- 6.48 Where food, drink and entertainment uses are permitted, they will need to be managed to protect the amenity of residents and the potential for additional housing in the area. To ensure such uses do not harm amenity or the character of an area, either individually or cumulatively, we will consider applying controls on hours of operation; refuse and litter; noise/vibration; fumes; customer area; off-site management and changes of use.
- 6.49 Management arrangements, including street wardens and, in Kilburn, town centre management, will be secured through planning conditions and obligations. Financial contributions, directly related in scale and kind, will be sought where appropriate. Camden's Statement of Licensing Policy sets out, for residents and licensees, the Council's approach to licensing and the expectations that the Council and the Metropolitan Police have for those involved in licensed activities.
- 6.50 The Council's Camden Planning Guidance supplementary document gives further borough-wide advice on the impact of food, drink and entertainment uses. Detailed guidance on how we will consider applications for such uses in particular centres is set out in our area planning documents (for Camden Town, Central London, West Hampstead and Finchley Road/Swiss Cottage).

OTHER TOWN CENTRE USES

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

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

Key references/evidence

- Camden Retail Study 2008; Roger Tym and Partners
- Planning Guidance for Central London/Camden Town/Finchley Road/Swiss Cottage/West Hampstead; London Borough of Camden (various dates)
- Camden Statement of Licensing Policy 2008
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 6 – Planning for Town Centres

ALTERNATIVE OPTIONS

- 6.53 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not restrict new food, drink and entertainment premises.	The Council aims to support successful centres in a way that does not harm the local area or amenity. While food, drink and entertainment premises are considered suitable uses in our centres, if the number of these uses is unrestricted, concentrations could develop which could harm the retail character of a centre by reducing the number of shops, and cause noise and disturbance. The Council's preferred approach, which manages the number and impact of such uses to secure the vitality and viability of centres and protect amenity, is considered the most appropriate option.
Do more to limit new food, drink and entertainment premises in some places.	The Council's preferred approach is to manage the number and impact of food, drink and entertainment premises to they do not harm the local area or amenity. It is not considered reasonable to limit such uses unless they are considered to cause harm to amenity or the area in which they are located. The Council's area-based supplementary planning documents control the level of such uses in individual shop frontages based on an assessment of the appropriate level of such uses and the level at which it is considered harm may be caused. Proposals for food, drink and entertainment uses are that are judged to cause harm to amenity or the local area will not be permitted.

Alternative option

Reason option was not chosen

Concentrate food and drink uses in certain locations to limit the size of the area affected by their impact.

The Council's preferred approach is to manage the number and impact of food, drink and entertainment premises to they do not harm the local area or amenity. It is not considered appropriate to concentrate uses in a way that focuses harm to amenity on particular parts of the borough. Proposals for food, drink and entertainment uses that are judged to cause harm to amenity or the local area will not be permitted.

Helping and promoting local shops

- 6.54 Small shops, often run by independent traders and providing specialist shopping, help to sustain the diversity, vibrancy and character of our centres and smaller shopping areas and provide suitable premises for local businesses. However, they are threatened by the continuing trend towards fewer, larger shops. Many responses to consultation on the key issues and options for the Core Strategy and Development Policies and on Camden's Community Strategy supported measures to encourage small local and independent shops and initiatives to encourage and promote retail diversity and entrepreneurialism in the borough. The Council's strategy for promoting town centres and shops, set out in Camden Core Strategy Preferred Approach CS16 – **Promoting our town centres and shops**, includes resisting the loss of shops where this would cause harm and seeking to protect local shops. Preferred policy DC32 sets out our detailed our approach on this matter.

Preferred Policy DC32 – Helping and promoting local shops

The Council will encourage the provision of small shop units suitable for local, independent businesses by:

- expecting large retail developments to include a proportion of smaller units;
- attaching conditions to planning permissions for retail developments to remove their ability to combine units into larger premises;
- encouraging the occupation of shops by local businesses and the provision of affordable premises.

The Council will seek to protect local shops outside centres by only granting planning permission for development that involves a net loss of shop floorspace outside designated centres provided that:

- alternative provision is available within walking distance; or
- within the Central London Area, the development contributes to local character, function, viability and amenity.

- 6.55 The Council's powers to tackle this issue are limited. For example, in most cases planning permission is not required to prevent adjacent shops being combined into larger premises. We resist the loss of shop premises in our centres where we consider that this would harm the character, function, viability and vibrancy of the area but we cannot influence the occupier of individual premises or the type of goods and services they provide.
- 6.56 However, there are some measures we can pursue, such as using conditions on planning permissions to remove the ability of shop units in new developments to combine into larger units in the future. We will also expect the provision of small shop units as part of large retail developments, provided that this is considered appropriate to the centre. The character of our centres and the Council's general approach to them is set out in Camden's Core Strategy. As a guide, small units are considered to be those that are less than 100 square metres gross floorspace, although we will take into account the character and size of local shops when assessing the appropriate scale of new premises. In addition, we will encourage developers and owners to seek local occupiers for these units where possible and provide premises at affordable rents to encourage small businesses.
- 6.57 Camden has many individual shops, traditional pubs and cafés and small shopping and service parades, complementing the role of larger town and neighbourhood centres. These provide for the day-to-day needs of the local population, workers and visitors and help provide locally accessible facilities for people with mobility difficulties. They also play an important social role in the surrounding community, as well as contributing to the character and identity of the local area.
- 6.58 The Council wishes to retain local shops outside centres where possible. However, we recognise that, as the number of people shopping locally has declined, it is unlikely that all shops outside centres will continue to find an occupier. Therefore, we will only grant permission for the loss of shops (Use Class A1) where there is alternative provision within 5 – 10 minutes walk, depending on the scale of provision. We will take into account any history of vacancy in a shop unit and the prospect of achieving an alternative occupier. We will also resist the loss of local pubs that serve a community role, unless alternative provision is available nearby or it can be demonstrated to the Council's satisfaction that the premises are no longer economically viable.
- 6.59 Shops within Camden's Central London area tend to experience greater pressures for conversion to non-retail uses than those in the rest of the Borough. Therefore, the Council will only grant permission for the loss of shops outside centres in Central London where it considers that the replacement use will not harm the local area. Appropriate alternative uses are considered to be housing and uses providing essential services for residents, businesses, workers and visitors such as launderettes, professional and financial services, and community facilities. When assessing such applications we will also consider guidance in the Council's supplementary planning documents, particularly Planning Guidance for Central London and Camden Planning Guidance.

Key References/evidence

- Camden Together – Camden's Sustainable Community Strategy, 2007 – 2012
- Planning Guidance for Central London/Camden Town/Finchley Road/Swiss Cottage/West Hampstead; London Borough of Camden; various dates

ALTERNATIVE OPTIONS

- 6.60 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option

Reason option was not chosen

Do not resist the loss of retail units

This option would allow shops to change to other uses without restriction. This would reduce the Council's ability to protect and promote our centres and local shops and is therefore considered contrary to government guidance and the London Plan.

Do not specifically support small and independent retailers

The Council has limited powers to support small and independent retailers. However, they are considered to be an important element in providing Camden's centres and smaller shopping areas with their diversity and character and provide suitable premises for local businesses, and therefore it is appropriate to use what power the Council has to support such uses. The Council's preferred option performed much more strongly in the Sustainability Appraisal than the alternative option.

Markets

- 6.61 Markets make an important contribution to the variety and attraction of shopping in the borough and to the character of their local areas. Camden benefits from a range of markets, from street markets, such as those at Earlham Street, Leather Lane and Queen's Crescent, to the famous Camden Markets (Stables, Camden Lock, Canal and Buck Street (Camden)) which are a major visitor attraction and such a key element to the success of Camden Town. Camden Core Strategy Preferred Approach CS16 – **Promoting our town centres and shops** seeks to support and protect Camden's markets.

Preferred Policy DP33 – Markets

The Council will promote and protect markets in Camden by:

- resisting the permanent loss of market use unless adequate replacement provision is made or there is no demand for continued market use;
- taking into account the character of the existing market when assessing proposals for the refurbishment and redevelopment of existing markets;
- supporting new markets that will not cause individual or cumulative harm to the local area. We will consider:
 - > their effect on local residents and environmental conditions;
 - > their impact on transport and pedestrian movement, including the effect on access and circulation, highways, parking and servicing;
 - > their effect on local centres and shopping provision;
 - > the storage and disposal of litter and refuse;
 - > community safety and noise; and
 - > toilet provision.

- 6.62 The Council will protect markets in the borough by resisting their permanent loss unless alternative market provision is made nearby or it is demonstrated to the Council's satisfaction that the level of demand means that continued market use is no longer economically viable.
- 6.63 The character of a market depends on a many factors including the type, range and quality of goods sold, the size of stalls and pitches and its environmental quality. Changes to markets can affect their character and consequently the character and attraction of the local area or centre. Where markets are refurbished or redeveloped we will take into account their existing character and its importance to the character, vitality and viability of the centre or area in which they are located. We will expect proposals to consider and, where appropriate, reflect this character.
- 6.64 Alongside their benefits, markets can, when poorly designed or managed, cause harm to the surrounding areas, particularly in terms of:
- congestion on footpaths, public transport and roads;
 - the obstruction of highways, footways and shops;
 - litter and refuse storage;
 - the potential for crime and the fear of crime;
 - noise.
- 6.65 It is therefore important that markets are carefully managed through secure design, environmental and street improvements and initiatives such as improving areas for parking and servicing. We will use conditions and/or legal agreements when granting planning permission to ensure the operation of markets does not cause harmful impacts and require detailed layout plans to be submitted as part of planning applications for market uses to allow us to consider whether these matters have been properly addressed.

Key References/evidence

- Planning Guidance for Central London/Camden Town/Finchley Road/Swiss Cottage/West Hampstead; London Borough of Camden; various dates
- The London Plan (consolidated with Alterations since 2004); Mayor of London; 2008
- Planning Policy Statement (PPS) 6 – Planning for Town Centres

ALTERNATIVE OPTIONS

- 6.66 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council's reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council's response to them.

Alternative option	Reason option was not chosen
Do not introduce planning policies to retain and promote Camden's markets	This option is contrary to government guidance in PPS6 which states that local authorities should seek to retain and enhance existing markets and, where appropriate, re-introduce or create new ones. In addition, the alternative option performed poorly in the Sustainability Appraisal as it would lead to the loss of local services and could erode historic character and local distinctiveness in the borough.

Shopfronts

- 6.67 Camden Core Strategy Preferred Approach CS16 – Promoting our town centres and shops seeks to promote successful and vibrant centres throughout the borough. The approach includes seeking to improve Camden's centres through environmental and design measures. It recognises that shopfronts can contribute greatly to the character of centres and their distinctiveness and attractiveness. Preferred Policy DP34 provides more detail on our approach to shopfronts. Most of Camden's town and neighbourhood centres date back to the 19th Century and earlier, having developed from commercial activities that first took place within dwellings, although there are some significant 20th Century shopping parades.

Preferred Policy DP34 – Shopfronts

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

- the design of the shopfront or feature;
- the existing character and design of the building and its shopfront;
- the relationship between the shopfront and the upper floors of the building and surrounding properties;
- the general characteristics of shopfronts in the area; and
- public safety.

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

- 6.68 Poorly designed shopfronts can cause harm to the character and attractiveness of a centre. If a shopfront is replaced or altered, the design should respect the characteristics of the building and, where appropriate, shopfront windows and framework features, such as pilasters, fascias and console brackets, should be retained or restored. Therefore, folding shopfronts will not generally be acceptable. Contemporary shopfront designs will be encouraged in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all.
- 6.69 The Council considers that the attractiveness of shopfronts can usually best be maintained by taking inspiration from the architecture of the building and existing units and reflecting the general scale and pattern of shopfront widths in the area. Good examples of shopfronts should be retained wherever possible.
- 6.70 Shop windows provide views into and from premises and can help bring activity provide and surveillance as well as attracting people into a shop. Displays in shop windows can add to the vitality and attraction of centres. Therefore we will seek to retain shop windows and shop window displays where appropriate.
- 6.71 To avoid harming the appearance of shop premises and creating clutter, security features should generally be internal. Solid shutters will not generally be acceptable. The Council's Camden Planning Guidance supplementary document provides more detail on the design of shopfronts and shopfront security. Lighting from shop windows can help to increase security after dark. However, this should be well-designed so it does not cause light pollution.

- 6.72 A number of Camden’s centres lie within conservation areas. The Council has prepared conservation area guidance for each of these which sets out detailed information on the area and the Council’s approach to its preservation and enhancement, including, where relevant, shopfronts.

Key References/evidence

- Conservation Area Statements/Appraisals/Management Plans; London Borough of Camden; various dates

ALTERNATIVE OPTIONS

- 6.73 Other options considered or suggested during consultation on Issues and Options are summarised below along with the Council’s reason for not choosing them. Please see the Development Policies Issues and Options Consultation Statement for a summary of the comments we received and the Council’s response to them.

Alternative option	Reason option was not chosen
Do not expect developments to enhance the appearance of shopfronts.	The design of our local environment affects our quality of life. The Council considers that Camden’s places and buildings should be attractive and safe and we should expect a high standard of design in all elements of the built environment. This option scored poorly on townscape criteria in the Sustainability Appraisal.

Appendix 1 – Parking standards

In line with the policy DP17 - **Parking standards and limiting the availability of car parking**, the parking standards that follow aim to promote the use of bicycles, cater for people with disabilities and essential service vehicles, and deter unnecessary car use. This Appendix gives the spaces permitted or required by each land-use, with an interpretation section explaining the calculation and different categories of spaces. Additional details of the dimensions, layout and location of parking are included in our Camden Planning Guidance supplementary document.

A1- SHOPS, **A2** - FINANCIAL & PROFESSIONAL SERVICES,
A3 - RESTAURANTS AND CAFES, **A4** - DRINKING ESTABLISHMENTS, **A5** - HOT FOOD TAKEAWAYS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Customer - from threshold of 500 sq m, 1 space per 250 sq m or part thereof.
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 1,000 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Customer - from threshold of 1,000 sq m, 1 space per 500 sq m or part thereof.
Service vehicles	Required above 1,000 sq m. One 3.5m x 16.5m bay, or one 3.5m x 8m bay where a servicing agreement is secured as part of a Travel Plan.
Taxis	One pick-up/ set-down bay required above 1,000 sq m, with any departure justified by a Transport Assessment.
Other staff / operational parking	Only considered if supported by a Transport Assessment showing that existing spaces, public transport and home delivery services cannot cater for the expected travel demand, and a Travel Plan can be secured.

B1 - BUSINESS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Visitor - from threshold of 500 sq m, minimum of 2 if any visitors are expected, plus any additional spaces needed to bring the total number up to 10% of the visitors likely to be present at any time.
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Visitor - from threshold of 2,500 sq m, minimum of 1 if any visitors are expected, plus any additional spaces needed to bring the total number up to 5% of the visitors likely to be present at any time.
Service vehicles	Required above 2,500 sq m. One 3.5m x 16.5m bay, or one 3.5m x 8m bay where a servicing agreement is secured as part of a Travel Plan.
Other staff/ operational parking	Low provision area: maximum of 1 space per 1,500 sq m. Rest of Borough: maximum of 1 space per 1,000 sq m

B2 - GENERAL INDUSTRY, B8 - STORAGE AND DISTRIBUTION

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Visitor - from threshold of 500 sq m, minimum of 2 if any visitors are expected, plus any additional spaces needed to bring the total number up to 10% of the visitors likely to be present at any time.
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Visitor - from threshold of 2,500 sq m, minimum of 1 if any visitors are expected, plus any additional spaces needed to bring the total number up to 5% of the visitors likely to be present at any time.
Service vehicles	Required above 2,500 sq m - one 3.5m x 16.5m bay.
Other staff/ operational parking	Low provision area: maximum of 1 space per 1,500 sq m. Rest of Borough: maximum of 1 space per 1,000 sq m

C1 - HOTELS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 500 sq m or part thereof. Resident - from threshold of 500 sq m, 1 space per 500 sq m or part thereof.
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Resident - from threshold of 2,500 sq m, 1 space per 1,250 sq m or part thereof.
Service vehicles	Required above 2,500 sq m - one 3.5m x 8.5m bay.
Coaches	Above 2,500 sq m - the Transport Assessment required under policy T1B / Appendix 2 will be required to consider the need for space for coaches to pick-up/ set-down and wait.
Taxis	Pick-up/ set-down bay adequate for 2 required above 2,500 sq m, with any departure justified by a Transport Assessment.
Other staff/ operational parking	Low provision area: maximum of 1 space per 1,500 sq m. Rest of Borough: maximum of 1 space per 1,000 sq m.
Other resident parking	Only considered if supported by a Transport Assessment showing that existing spaces, public transport and coaches/ taxis cannot cater for the expected travel demand, and a Travel Plan can be secured.

HOSTELS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Resident - from threshold of 500 sq m, 1 space per 250 sq m or part thereof.
People with disabilities	Staff/ operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Resident - from threshold of 2,500 sq m, 1 space per 1,250 sq m or part thereof.
Service vehicles	Required above 2,500 sq m - one 3.5m x 8.5m bay.
Coaches	Above 2,500 sq m - the Transport Assessment required under policy T1B / Appendix 2 will be required to consider the need for space for coaches to pick-up/ set-down and wait.
Taxis	Pick-up/ set-down bay adequate for 2 required above 2,500 sq m, with any departure justified by a Transport Assessment.
Other staff/ operational parking	Low provision area: maximum of 1 space per 1,500 sq m. Rest of Borough: maximum of 1 space per 1,000 sq m.
Other resident parking	Only considered if supported by a Transport Assessment showing that existing spaces, public transport and coaches/ taxis cannot cater for the expected travel demand, and a Travel Plan can be secured.

C2 - RESIDENTIAL INSTITUTIONS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Visitor - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. A lower figure may be accepted where visitors are unlikely to use cycles due to age, disability or infirmity. Resident (education only) - from threshold of 500 sq m, 1 space per 250 sq m or part thereof.
People with disabilities	Staff / operational - 1 space per disabled employee or, from a threshold of 2,500 sq m, 1 space per 200 beds or part thereof - whichever is the greater. Visitor / patient / resident students - from threshold of 2,500 sq m, 1 space per 50 beds or part thereof.
Service vehicles	Required above 2,500 sq m - one 3.5m x 8.5m bay. For hospitals and care homes, the Transport Assessment required under policy T1B / Appendix 2 will be required to consider the need for space for ambulances and other patient transport vehicles.
Taxis	Pick-up / set-down bay adequate for 2 required for hospitals and care homes above 100 beds, with any departure justified by a Transport Assessment.

C2 - RESIDENTIAL INSTITUTIONS (continued)

Vehicle Type	Standard
Other staff/ operational parking	Low provision area: maximum of 1 space per 20 beds. Rest of Borough: maximum of 1 space per 10 beds. Any additional needs for staff providing home visits and working anti-social hours will be considered provided they are supported by a Transport Assessment, and a Travel Plan can be secured.
Other visitor parking	Only considered if supported by a Transport Assessment showing that existing spaces, public transport and coaches/ taxis cannot cater for the expected travel demand, and a Travel Plan can be secured. Spaces will be considered provided they are supported by a Transport Assessment showing that existing spaces, public transport and taxis cannot cater for the expected travel demand, and a Travel Plan can be secured. The need for patients to be accompanied and for patients and visitors to attend at anti-social hours will be considered.

C3 - RESIDENTIAL DEVELOPMENT (dwellings)

Vehicle Type	Standard
Cycles	Residents - 1 storage or parking space per unit. An exception may be made for dwellings available solely to occupants unlikely to use cycles due to age or disability. Visitors - from threshold of 20 units, 1 space per 10 units or part thereof.
People with disabilities	Wheelchair housing: 1 space per dwelling, with dimensions suitable for use by people with disabilities. General housing: where justified by the likely occupancy of the dwelling and reserved for use by people with disabilities, above a threshold of 5 units, 1 space per 10 units or part thereof, with dimensions suitable for use by people with disabilities.
General car parking	Low provision area: maximum of 0.5 spaces per dwelling. Rest of Borough: maximum of 1 space per dwelling.

D1 - NON-RESIDENTIAL INSTITUTIONS

Vehicle Type	Standard
Cycles	Staff - from threshold of 500 sq m, 1 space per 250 sq m or part thereof. Visitor - from threshold of 500 sq m, 1 space per 250 sq m or part thereof.
People with disabilities	Staff / operational - 1 space per disabled employee or, from a threshold of 1,000 sq m, 1 space per 20,000 sq m or part thereof - whichever is the greater. Visitor - from threshold of 1,000 sq m, 1 space per 500 sq m or part thereof.
Service vehicles and coaches	Low provision area: maximum of 0.5 spaces per dwelling. Rest of Borough: maximum of 1 space per dwelling. No minimum requirement, on-site provision should be on the basis of early negotiation supported by the Transport Assessment required under policy T1B / Appendix 2.

D1 - NON-RESIDENTIAL INSTITUTIONS (continued)

Vehicle Type	Standard
Taxis	Pick-up / set-down bay adequate for one required above 1,000 sq m, with any departure justified by a Transport Assessment.
Other staff/ operational parking	Low provision area: maximum of 1 space per 1,500 sq m Rest of Borough: maximum of 1 space per 1,000 sq m Any additional needs for staff working anti-social hours will be considered provided they are supported by a Transport Assessment, and a Travel Plan can be secured.
Other visitor parking	Only considered if supported by a Transport Assessment showing that existing spaces, public transport and taxis cannot cater for the expected travel demand, and a Travel Plan can be secured.

Parking standards Interpretation

Calculation of parking standards	<p>Numerical parking standards for cycles and car spaces for people with disabilities are requirements. Above the thresholds specified, the requirement for a specific scheme is calculated by rounding any fractions up to a whole number.</p> <p>Other car parking standards are maximum standards, and the maximum for a specific scheme is calculated by rounding any fractions down to a whole number. This practice will ensure that marginal floorspace increases are not used as justification for excess spaces.</p> <p>Applications which do not meet the standards for cycle parking or car spaces for people with disabilities should demonstrate that the development cannot accommodate these requirements and/or demonstrate (generally through a Transport Assessment) that the needs of cyclists and people with disabilities can be met in other ways. Applications involving parking provision in excess of the maximum standards (for example, to meet the operational needs of a small business) should be supported by a Transport Assessment, and a Travel Plan should be agreed. In cases where standards do not provide for spaces for service vehicles and visitors (e.g. residential development), to justify provision in excess of the standards, the Transport Assessment will have to demonstrate to the satisfaction of the Council that the needs of servicing and visitors cannot be met by existing on-street spaces, public car parking, public transport and taxis.</p>
Measurements	Parking standards which relate to floorspace are assessed as spaces per sq m of gross floor area (GFA).

Parking standards Interpretation

Service vehicles	Above the thresholds specified in the standards, for most land uses there is a requirement for off-street space for service vehicles, with specific dimensions. Applications involving provision of a different amount of space for service vehicles, whether greater or less, should be supported by a Transport Assessment, and a Travel Plan should be agreed to include a servicing agreement.
Operational parking	Parking standards which relate to floorspace are assessed as spaces per sq m of gross floor area (GFA). Operational parking (other than parking for people with disabilities and space for service vehicles) is included within the maximum permitted standards. Applications involving parking provision for genuine operational needs in excess of the minimum standards should be supported by a Transport Assessment, and a Travel Plan should be agreed.
Motorcycle parking	Operational parking (other than parking for people with disabilities and space for service vehicles) is included within the maximum permitted standards. Applications involving parking provision for genuine operational needs in excess of the minimum standards should be supported by a Transport Assessment, and a Travel Plan should be agreed.
Electric vehicles	The Council welcomes provision of electric vehicle charging facilities for any permitted car parking space.
Low provision area	The Clear Zone Region (Central London Area) and the King's Cross Opportunity Area form a low provision area that has lower maximum standards than the rest of the Borough. The Council will consider extending the low provision area, bearing in mind issues of air quality, traffic congestion and public transport accessibility.
Mixed use development, including premises containing two or more related uses	In the case of a mixed use development, the standards should be applied to each land use. Dual use of parking spaces will be encouraged where practical. The same principle will be applied where there are premises containing a number of related uses, such as a hotel containing a public restaurant.
Design considerations	Parking standards need to be considered alongside the other policies of the UDP. Applications where the number of spaces complies with the parking standards will not automatically be permitted if the accommodation of these spaces creates conflicts with other elements of UDP, such as policies relating to road safety, visual appearance and street frontages.

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