

Planning Policy
London Borough of Camden
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12 March 2024

RE: Draft Camden Local Plan Consultation Response

To Whom It May Concern

The enclosed representations relate to the Draft New Camden Local Plan 2024 and are submitted on behalf of the London Property Alliance's Camden Working Group and Knowledge Quarter Liaison Group.

We welcome the opportunity to comment on the draft Local Plan and we would like to thank the London Borough of Camden for their comprehensive engagement on the Plan.

We have set out our comments with paragraphs relating to relevant planning policies/supporting paragraphs in the draft Local Plan. We do not comment on individual site allocations but rather the overarching policies of the Plan. Members may submit individual representations relating to their own land holdings in the Borough.

The London Property Alliance (LPA) is a not-for-profit membership body bringing together leading developers, owners, investors and related property professions across central London's Commercial Activity Zone (CAZ), providing a unified voice for the built environment. The London Property Alliance includes a Camden Working Group of key landowners and developers in Camden and a Knowledge Quarter Liaison Group of those members most active in the Knowledge Quarter Innovation District whose members comprise the below. The full list of LPA Members is attached to this letter.

London Property Alliance: LPA members of the Knowledge Quarter Liaison Group and Camden Working Group

British Land - Michael Meadows
Derwent London – Richard Baldwin
Gerald Eve – Lisa Webb (Chair) and Alex Neal
GrovworlD – Ross Jacobson
JLL – Charles Pinchbeck
Landsec – Tim Trillo
Lendlease – Phil Gould/Jenny Sawyer
Momentum – Roy McGowan
Moorfields Eye Hospital – Kieran McDaid
Precis – Faaiza Lalji

Reef Group - Peter Langly-Smith

Related Argent - Alexandra Woolmore

Stanhope – Charles Walford

St George - Greg Tillotson/Claire Hammond

Turley – Oliver Jefferson

London Property Alliance response

Chapter 1: Introduction

The draft Local Plan seeks to deliver on Camden’s corporate ambitions in “We Make Camden” and sets out strategic objectives and vision for development in the Borough which we support.

Chapter 2: Development Strategy

We agree that there should be strong support for delivering new development within the Central Activities Zone, growth areas, town centres and other major development locations within Camden. As set out in Camden’s KQ2050 Strategy, the Knowledge Quarter has the potential to lead the way in inclusive innovation and become the best place in Europe for collaboration, innovation and research, while fulfilling the social and economic potential for its residents. It therefore plays a critical role in delivering inclusive growth for the Borough and London. This importance should be emphasised in the draft Plan.

Given the Borough’s central London location, we consider that the whole Borough ought to be considered capable of delivering new development, in principle. We suggest that a further paragraph is added below Figure 2 – Key diagram to state **“Whilst the key diagram identifies the areas of main focus for development, considering the central London location of Camden, the whole borough is considered capable of delivering new development, subject to meeting the necessary policy requirements of this Local Plan”**.

We agree with the main principles of draft **Policy DS1 - Delivering Healthy and Sustainable Development** which seeks to ensure that all development is socially and economically inclusive and environmentally sustainable in order to maximise community benefit, respond to the climate emergency, create stronger communities and deliver healthy places, both for existing communities and future generations. It is important that the requirements listed in Policy DS1 are applied flexibly on a site by site basis and text on this basis should be included.

Policy DS1 should make specific reference to optimising site capacity. The London Borough of Camden is a central London Borough where all development should make the best use of land by following a design-led approach that optimises the capacity of sites through high density development.

The priorities of part (iv) of draft Policy DS1 feel contradictory, with the Council requiring a mix of uses but stating that self-contained housing is the Council’s priority land use. It is considered that this should be amended to read **“Self-contained housing is the priority land use in the Plan. However, on appropriate sites, a mix of uses, services, facilities and**

amenities that meet the needs of the local community and are easily accessible on foot, by bike and via public transport, will also be supported”.

Draft Policy DS1 part (b) and paragraphs 2.27 and 2.28 require major applications to contribute financially to Camden’s Citizen Scientist community research programme. No detail is given on what these contributions would be. There is a risk that this will place a further burden on developments that are already struggling with viability. It is also not clear how this could be considered to reasonably meet the National Planning Policy Framework (NPPF) tests required for Section 106 (S106) obligations, as being necessary to mitigate development. Accordingly, it is considered that paragraphs 2.27 and 2.28 should be removed.

South Camden

Much of South Camden is located within the Central Activities Zone where the focus should be on growing and supporting the economic productivity of London.

Notwithstanding our comments on mixed use policy H2 set out below, we support part (F) of **Policy S1 – South Camden** where financial contributions towards housing could be used on Camden’s housing estates to enable the delivery of developments through the Council’s Community CIP Programme.

We support Part I of the policy which acknowledges that the Central Activities Zone and Knowledge Quarter will continue to be the main focus of employment development in Camden. We also support Part J which seeks to support the Knowledge Quarter to thrive as a hub of innovation and knowledge intensive industries in line with the KQ2050. Requiring housing on site in these locations is challenging both in terms of viability and the potential conflict between land uses and may prejudice the area’s economic productivity and future growth, contrary to London Plan objectives and the KQ2050 Strategy.

Chapter 7: Meeting Housing Needs

Policy H2 - Maximising the supply of self-contained housing from mixed-use scheme

We acknowledge that Camden’s priority is the delivery of self contained housing but requiring housing from commercial-led schemes undermines other policy objectives in the Plan and the London Plan which promote economic development within the Borough and in particular within the Central Activities Zone and Knowledge Quarter.

Existing Local Plan Policy H2 which requires housing from commercial schemes is in direct conflict with the London Plan and is increasingly challenging as it threatens to undermine the deliverability of commercial development in the Borough. Camden is the only Borough in London which still has a mixed-use policy, which impacts its commercial attractiveness and therefore investment when compared to other parts of central London. It is acknowledged that Camden is falling short of achieving its annual housing targets. However, we do not consider the requirement for housing to be delivered alongside and to the detriment of commercial development in central London as an appropriate or justified strategy for addressing this issue. We therefore consider that Policy H2 should be deleted.

The application of Policy H2 has been extended to include land to the north of King's Cross, including it within a new sub area of 'South Camden'. South Camden includes the Central Activities Zone and the Knowledge Quarter. If the Knowledge Quarter is to retain its premier status as London's leading innovation district, and meet the Council's own objectives in its KQ2050 strategy, commercial development in this area should be prioritised.

We do not consider that any form of mixed-use policy should apply in the Central Activities Zone or the Knowledge Quarter. The Plan should recognise the specialist nature of the Knowledge Quarter and life science developments in particular, the strategic objectives for this sector and the challenges that it has in delivering housing.

Notwithstanding these points, if a form of mixed-use policy is to remain in the Local Plan and be applicable to the Central Activities Zone and the Knowledge Quarter, we consider that it should focus on a financial contribution to be used on other Camden housing developments in the Borough rather than requiring housing to be provided on site or off site. This approach would prioritise the much-needed employment space where it is needed and can benefit the most and support the role of Camden's Central Activities Zone and the Knowledge Quarter and enable the delivery of new homes on Camden's own estates, in line with Policy DS1.

An alternative approach would be for the Policy to seek a financial contribution on small / medium sized schemes proposing increases in floorspace of up to 2,000 sqm, below which it is most challenging to provide the housing as part of a commercial scheme (and for which under current policy, onsite affordable housing is not required), and prioritise housing / affordable housing delivery on larger schemes. In order to prioritise the delivery of affordable homes, we would also suggest that the Policy is clear that where housing is required under any form of mixed-use policy, that the Council will prioritise the delivery of affordable housing.

Consideration should also be given to a housing/affordable housing credit system to take account of situations where new housing/affordable housing is delivered by a developer early, or through a portfolio approach to development, and which can then be used to offset any planning requirement generated by a future scheme. This approach can deliver better outcomes in terms of early delivery of affordable housing in a more appropriate location.

Draft supporting Paragraph 7.28 states that "Policy H2 seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing". However, it is considered that this should cross refer to paragraph 7.9 which sets out the other forms of housing that would also be considered to constitute self-contained housing and contribute towards meeting housing targets.

Draft supporting Paragraph 7.46 -The Council is aware that the opportunity to find an off-site housing site within the Borough is rare and if one is found, the cost of acquiring the site renders many schemes unviable. Introducing an 800-metre distance in terms of the initial search area is onerous and unrealistic.

Furthermore, there appears to be no evidence base for the search area. The specific distance requirement is unnecessary and the criteria for an off-site solution should be based on

whether the site is appropriate or not in order to maximise the planning benefits of both the host and donor sites.

Policy H4 - Maximising the supply of affordable housing

Part D seeks to apply the affordable housing provisions of the London Plan for build to rent housing, purpose-built student accommodation, and largescale purpose-built shared living, but as an alternative will strongly encourage contributions of on-site affordable housing. The recognition of London Plan policy requirements around these tenures and the flexibility introduced in this policy is welcomed.

As with the current Plan there is support for innovative intermediate housing products that can be made affordable to a wider range of groups in Camden but the draft Plan stops short of referencing co-living as an acceptable housing product. Reference to co-living would align with the London Plan and therefore should be included.

Draft supporting Paragraph 7.139 – 7.141 - The acknowledgment that build to rent could potentially help to increase overall housing output in Camden is welcomed. Paragraph 7.141 states that, with regards to build to rent, the Council will be flexible in the application of affordable housing and dwelling size policies to development of build to rent housing where we consider such housing will help to create mixed, inclusive, and sustainable communities. This flexibility is supported.

Policy H7 - Large and small homes

Draft Policy H7 relates to the size of homes and refers to Table 5 in the supporting text which sets out the Council's priorities for different sizes of homes. The Council is aware that the cost of living in Camden is extremely high. Therefore, we consider that the provision of studios and 1 beds in the private market tenure should be increased to a medium-high requirement. This would provide the acknowledgement that because of their inherent size, studios and 1 beds can, and should, be supported as they usually offer a more affordable form of housing.

Policy H9 – Purpose built student accommodation

Part E. We do not consider that it is reasonable to require permanent self-contained housing where existing student housing is proposed to be lost. The uses are not directly comparable, nor justified. Reference to the provision of permanent self-contained housing should therefore be deleted.

Chapter 8: Responding to climate change

Whilst we fully recognise the climate emergency and support the overarching aspirations relating to climate change in the Local Plan, we consider that the policies contained within it are incredibly detailed and would be more appropriate as part of a new/updated Supplementary Planning Document rather than included within the Local Plan itself.

Furthermore, the EUI policy is inconsistent with the London Plan and therefore premature in advance of the London Plan Review. The Written Ministerial Statement made on 13 December 2023 states that the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards.

It states that:

'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.

Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale...'

It goes on to state that:

'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.'

The current approach adopted in the draft Local Plan does not include 'well-reasoned and robustly costed rationale' and is therefore inconsistent with national and regional policy.

Policy CC1 - Responding to the climate emergency

Draft Policy CC1 currently applies to all development in Camden. This is incredibly onerous and it is considered that a threshold should be applied. At the very least the Policy CC1 should read **"The Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development, where relevant, in Camden to respond to the climate emergency by:"**.

Draft supporting Paragraph 8.6 – it is not reasonable to require all planning applications to submit a Sustainability Statement. For example, we are unclear how this would apply to a change of use application with no physical works proposed or a planning application for a minor external alteration.

Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings

The draft Plan includes a new Policy for Repurposing, Refurbishment and Re-use of Existing Buildings. It is not clear whether this policy applies to all applications or major applications and even where demolition is not proposed.

Part B of the Policy requires applicants to undertake a condition and feasibility assessment, to understand the re-use potential of the existing buildings and explore the best use of the site. This includes a requirement for the applicant to seek to explore a range of alternative uses. Firstly, Part B should only apply where extensive or substantial demolition is proposed

and secondly, the acceptability of the proposed use is dealt with in other land use policies in the Plan and therefore reference to exploring the best use of the site should be removed. The Council should consider adopting a similar approach to the [City of London Corporation's Planning Advice Note \(PAN\) March 2023](#) which provides greater clarity on the introduction of Carbon Optioneering and the level of information required at pre-application and application stages.

Part C should only apply where extensive or substantial demolition is proposed. This would incentivise developers to avoid extensive or substantial demolition due to a lower evidential bar for less invasive work. A definition for extensive or substantial demolition should be included.

Whilst we agree that where a feasibility study is required, it should be discussed with the Council at an early stage of the development process, we do not consider it appropriate for the Policy to specify that these discussions should take place before progressing the design of any scheme. This could add significantly to the planning programme and delay the delivery of much needed development. Part D should be reworded to read **“Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity”**.

Part E needs to include a definition of ‘partial or substantial demolition’. Retrofit projects are likely to include an element of demolition and it is therefore important to get the threshold right so that this is not triggered unnecessarily.

Part E ii. should be removed as the best use of a site is assessed against land use policies in the Plan. What is the best use for the site, including supporting other policy objectives in the Plan and delivering the best public benefits for Camden, will not necessarily be the lowest carbon option. The optioneering exercise should be used only as a tool in the discussion and negotiation of a proposal to help optimise the design of the scheme. It should not direct development that other policies in the Plan are designed to manage.

Part F requires applicants to demonstrate that the re-use of materials has been explored on site. There should be an acknowledgement of re-using materials on another site nearby or placing materials back into the supply chain to be used elsewhere.

Draft supporting Paragraph 8.12 – There needs to be more clarity and detail on what is required as part of a condition and feasibility assessment.

Draft supporting Paragraph 8.13 – It is too onerous to require the submission of appropriate detailed drawings to demonstrate that options such as refit, re-use, refurbish, substantial refurbishment and extension have been fully explored. This sentence should be removed.

Draft supporting Paragraph 8.14 – As with Part D of the Policy, this paragraph should remove reference to ‘before progressing with any scheme’ and be re-worded to read **“Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity”**.

Draft supporting Paragraph 8.15 - In the absence of a definition, the requirements in this paragraph apply to even the smallest demolition as part of a refurbishment scheme which is inappropriate.

Draft supporting Paragraph 8.16 – The paragraph should be reworded to read **“Where it is demonstrated to the Council’s satisfaction that repurposing, refurbishment, or reuse options are not feasible, we will expect the replacement building to meet, or exceed the targets set out in this plan, where feasible, for:”**.

Policy CC3 - Circular economy and reduction of waste

The Policy requires all developments to optimise resource efficiency and be designed to facilitate easy maintenance and adaptability of use demonstrated in a Sustainability Statement. There needs to be a threshold included as there should not be a requirement for all applications to document how the requirements set out in criteria (i) and (ii) have been met. We would suggest that this applies to major developments.

Part iv. D of the Policy should clarify whether the recycled materials is by mass or by value in accordance with the GLA guidance.

Draft supporting Paragraph 8.23 – Using the formula the paragraph should be reworded to read **“The result is a percentage from 10 to 100 where 100% would be retaining all materials and 10% would be completely new materials.”**

Policy CC4 – Minimising carbon emissions

Generally, we consider that the wording in the Policy should reflect aiming at targets and demonstrating what has been done to try to achieve them, rather than enforcing limits in the absence of consistent Whole-life carbon assessments and reporting.

Draft Policy CC4 requires applicants for all new build development and all development proposing substantial demolition to:

- a. submit a whole life carbon emissions assessment (including operational and embodied carbon), following the GLA Whole Life Cycle Carbon Assessment template, as part of the planning application; and
- b. demonstrate that they have done all they can to minimise carbon emissions over the lifespan of the building/s, targeting the GLA Whole Life Carbon aspirational benchmarks in modules B – C.

There is no definition of ‘substantial demolition’ which should be clarified. The GLA’s Whole Life-Cycle Carbon Assessments guidance excludes B6 and B7 emissions and therefore this policy should be aligned and clarified.

The draft Policy requires all new build developments to meet embodied carbon limits of less than 500kg CO₂/m² for residential, and less than 600kg CO₂/m² for non-residential. These targets are inappropriate for capturing all non-domestic typologies. At best this should

reflect the benchmarks/limits from the upcoming UK Net Zero Carbon Building Standard (UKNZCBS). This should be included in guidance rather than the Local Plan to enable it to be reviewed and updated. The targets should not be treated as pass/fail. There needs to be some acknowledgement of site specific and technical constraints and/or trade-offs with intensification and the delivery of other plan policies. This Policy should only apply to major developments and not all.

Draft supporting Paragraph 8.26 – This whole paragraph should be updated to reflect the upcoming UKNZCBS benchmarks / targets.

Policy CC5 - Energy reduction in existing buildings

Draft Policy CC5 sets out the Council's approach to reducing energy in existing buildings with the aim to ensure they contribute towards achieving local and national targets for zero carbon development.

Part i. of the policy requires all development proposals for the alteration, extension and/or conversion of an existing building to demonstrate how they have considered and will implement energy efficient improvements. It cannot be the intention to withhold planning permission for physical works if not accompanied by other changes to improve energy efficiency. We would suggest that the wording is amended to apply to major development proposals only.

Part iv. a) of the policy requires proposals that include the addition or replacement of 500sqm floorspace or more; or developments providing one or more additional dwellings through conversion and / or additional floorspace to reduce the amount of energy required to heat the building/s over a year, as far as possible, to meet a space heating demand of 50 kwh/m2/year. In an extension scenario, it is not clear whether this requirement applies to the extension or the whole building. If the latter, this will create huge challenges around ownership and occupiers. The targets are currently not consistent with the targets set out in the London Plan Energy Assessment Guidance. These should be aligned.

Part iv. c) of the policy requires proposals that include the addition or replacement of 500sqm floorspace or more; or developments providing one or more additional dwellings through conversion and / or additional floorspace to demonstrate to the Council's satisfaction that it has maximised the generation of renewable energy on-site (through solar photovoltaics (pv)), as far as practical. Whilst this is generally supported, there should be reference to other renewable energy sources.

Part v. of the Policy seeks to encourage all other proposals for the alteration, extension and/or conversion of an existing building (not specified in A(iv)) to also meet the standards set out in A(iv) a, b, c and d above. Although the wording is more relaxed than part iv. a) and seeks to encourage rather than require, the same concerns apply as set out above.

Part vi. of the Policy only references an EUI target for residential uses. This part needs re-wording and clarifying.

Draft supporting Paragraph 8.33 – All development proposals relating to an existing home or building are required to submit a Sustainability Statement showing how energy demand (or potential heat loss) for the proposal will be reduced as far as possible through building fabric (materials), and any additional measures considered as part of a whole building approach. This is not practical or feasible and does not set out how change of use applications would be assessed. This should apply only to major developments.

Draft supporting Paragraph 8.51 - Table 6 should include acknowledgement of curtain walling performance within the table.

Policy CC6 - Energy reduction in new buildings

Part ii. requires all new residential and non-residential buildings to achieve a space heating demand of 15 or less kWh/m² GIA/yr. This should follow the wording and approach of the GLA in the Energy Assessment Guidance, rather than being hard requirements. This should also only apply to major developments.

Part iv. requires renewable energy generation on-site to match, or be in excess of, the predicted total annual energy demand of the building (EUI). This will not be possible for many typologies and is therefore not feasible and unsound.

Part iv. c) requires on-site renewable energy generation (e.g. through photovoltaics (PVs) to be maximised and achieve at least 80 kWh/m² building footprint for all building types (at least 120 kWh/m² for industrial buildings). It is assumed that this is annually but clarification is sought. We question whether this requirement has been fully justified as there does not appear to be any evidence base to support these figures. The figures should be written as targets rather than fixed requirements and take into consideration specific site circumstances that may prevent the target from being achieved.

Draft supporting Paragraph 8.61 – The joint Delivering Net Zero study is clear that the options are either EUI or Part L and not both. As the draft Local Plan is now inconsistent with the London Plan any referable applications will be required to address Part L and EUI. This is impractical and not workable.

Draft supporting Paragraph 8.63 – This should be reworded to read “**Energy Use Intensity (EUI), or metered energy use, is the total energy needed to run a building over a year (per square metre GIA).**”

Draft supporting Paragraph 8.65 – As set out in the representations to Policy CC6, this should only apply to major developments. It would be incredibly onerous for smaller applications to be assessing unregulated energy.

Draft supporting Paragraph 8.66 - The offset payment should be consistent with the GLA. There is no guidance on how this offset payment would apply to referable applications where the GLA adopt a Part L model. The supporting text states that the offset payment is based on the cost of providing that capacity if the space had been available. The rate is based on the cost of deploying a certain type of renewable energy system, rather than the cost of offsetting carbon emissions, which is the ostensible purpose for which the Section 106 funding is being collected.

Draft supporting Paragraph 8.67 – The Council’s study underpinning this fee presupposes extensive use of PVs, and is based on off-site carbon savings being achieved solely by PVs. This is clearly impossible in a dense, and historic, urban environment such as Camden, and is both unreasonable and legally unsound. There does not appear to be any viability evidence to support the offset calculation. There is also an absence of any viability evidence to demonstrate the impact on individual developments. It is considered that the carbon charge as proposed is unjustified, would not comply with CIL Regulation 122, would not comply with relevant London Plan policy, and would have a material, adverse, effect on development viability in Camden.

Policy CC8 - Overheating and cooling

Part iii. states that where the need for active cooling is demonstrated to the Council’s satisfaction, the Council will also require the carbon used to operate the system to be offset through the installation of solar photovoltaics. Part iii. should be reworded to read **“Resist applications that include active cooling and non-essential mechanical plant. Applications including active cooling will be resisted unless justified by dynamic thermal modelling and the design already integrates passive measure”**.

Part iv. relating to materials and finishes having the ability to reflect sunlight is unnecessary and should be removed as it is covered implicitly under passive measures.

Draft supporting Paragraph 8.77 – This paragraph should be reworded to read **“Active cooling (air conditioning) and excessive mechanical plant will not be acceptable unless it is demonstrated to the Council’s satisfaction there is a clear need for it (i.e. sterile internal air, for some non-residential uses) and all other passive measures have been integrated, where feasible.”**

Policy CC9 – Water Efficiency

Part iv. should be reworded to read **“Require all new buildings to include greywater or rainwater harvesting appropriate to the scale and nature of the proposed development”**.

Policy CC10 - Sustainable design and construction certification

Part ii. should clarify whether this applies to changes of use applications where no physical works are proposed.

CC12 - Sustainable drainage

Part i. is too prescriptive and should be about referencing SuDs principles rather than requiring specific measures. It should also only apply to major developments.

Chapter 9: Delivering an Inclusive Economy

The LPA strongly supports the principle of growing a strong, diverse and inclusive economy and enabling residents, businesses and the voluntary sector to share in the Borough's economic growth. We welcome the Plan's support to ensure a continuing supply of employment development to deliver growth and innovation. However, the following comments should be addressed.

Policy IE1 – Growing a successful and inclusive economy

Whilst it is appropriate for the majority of the criteria in draft Policy IE1 to be set out in the Local Plan, we consider that a number of the criteria go beyond what is appropriate for planning policy to control:

Part x. it should not be for the planning system to address the provision of childcare facilities to support working families. This should be deleted.

Part xi. the market should dictate the need to provide digital connectivity to support occupiers. This is not a planning requirement and should be deleted.

Policy IE2 - Offices

The LPA supports the overarching aims of the policy to manage and protect the office stock in the Borough to ensure that suitable and viable accommodation is retained and welcomes the specific support for ensuring a sufficient supply of space for research and development. This is fundamental to the success of the Knowledge Quarter and the aspirations of the Council in KQ2050.

Having regard to protecting space which is suitable and viable is key, particularly given the sectoral shift that has occurred in the office market post Covid, where demand is high for the highest quality space in the most accessible locations, but that demand is no longer there for secondary offices which are not well located and/or fail to meet modern occupier requirements for quality, flexibility and sustainability.

Part C i. The reduction in the length of the marketing period required (from 24 to 12 months) to justify a loss of office space is therefore welcomed.

Part C i. b) The LPA does not however agree that discounted rent and incentives should be included within the Policy. This is not a planning matter and there is no justification. This reference should be removed.

Part C i. c) Whilst it may be feasible to reconfigure office space, if there is a lack of demand for the space, it is not reasonable for landowners to invest in reconfiguring a building which is not fit for purpose. In any event, in most cases, internal alterations do not require planning permission and this reference should be deleted.

Part D. Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is welcomed.

Part E. Notwithstanding the floor area, if it can be successfully demonstrated that there is no demand for office accommodation, then there is likely to be no requirement to provide affordable workspace. Reference to the provision of affordable workspace should be deleted. If it is to remain, there should be clarity on the quantum of affordable workspace required.

Policy IE3 – Industry

As currently worded the policy is inconsistent with the strategic objectives of the Plan in terms of promoting growth and maximising benefits through a mix of uses. The Policy should be more positive and refer to the need to balance the prioritisation of industrial/warehousing retention (IE3 B) with other land use priorities, in particular residential as ‘the priority land use in the Plan’ (DS1 A) and also with land use provisions in site allocation policies; as drafted all these policies appear to compete without much clarity on how the planning authority will apply the planning balance.

The Policy should emphasise the need to promote the creation of jobs across a range of flexible E/B use classes rather than focussing on the re-provision of industrial uses, particularly when a number of the existing industrial units and warehouses are vacant. Where industrial sites are within the Knowledge Quarter, flexible E/B uses have the potential to deliver greater social value/inclusive economy benefits.

Policy IE4 – Affordable and specialist workspace

Whilst the requirement for the delivery of some form of affordable workspace is understood and affordable workspace has been delivered on commercial schemes in practice in Camden for some years, there is no justifiable evidence base to support the requirements set out in Policy IE4.

The draft Policy IE4 A ii requires 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years.

Firstly, the policy appears to read as though it is seeking 20% of the gross (total) floorspace of a development as affordable workspace. This cannot be the case, and we assume, as has been the case to date, that it is seeking 20% of the uplift in floorspace proposed. The former would be perverse and, for example could seek more affordable workspace within a building than the uplift in floorspace proposed which cannot be right. This is an important point that requires clarification.

Secondly, there is no justification for seeking 20%. This is a significantly greater requirement than in any other Borough in London and we can see no evidence base to justify the need for this quantum of affordable workspace or the viability evidence to demonstrate that this is a viable policy requirement. 20% (even on the uplift in floorspace) is very onerous and is unlikely to be viable or achievable.

Notwithstanding the above, the introduction in Part A iii of the Policy of a cascade approach of on-site / off site provision / then payment-in-lieu is welcomed and we consider if applied flexibly could deliver much better outcomes in terms of overall provision of affordable

workspace of the right size and in the right locations in the Borough. The Council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. This is generally supported. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.

Given the specific requirements of the Knowledge Quarter within Camden and the acute shortage of start-up and grow on space for life sciences, which has been widely reported, the Policy should have specific regard to this. A more flexible approach should be taken to laboratory development which acknowledges the cost and specification required to set up affordable laboratory space and the skills required to run such spaces is significantly greater than standard affordable office space.

Policy IE5 - Hotels and visitor accommodation

The draft Policy is more restrictive on hotel and visitor accommodation as it seeks to restrict large scale hotels and visitor accommodation to be located within the Central Activities Zone and smaller and medium hotels in the town centres. There is currently no definition of large, medium or small scale hotels.

The current Local Plan policy considers tourism development outside of the Central Activities Zone and town centres where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough. This flexibility should be included.

The Council recognises that Camden Town plays an important role in the night time economy. It therefore makes sense to support hotels in this highly sustainable location. There is a huge demand for hotel/visitor accommodation of all sizes in town centres It is therefore considered that Part (A) (i) and (ii) should be amalgamated to read:

- (i) require new, large-scale hotel and visitor accommodation to be located in the Central Activities Zone, *and in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage*; with preference given to locations with a commercial / tourism character, a concentration of existing visitor accommodation or with an established commercial / mixed-use character;

Policy IE6 - Supporting town centres and high streets

Part x. expects major developments (2,500sqm or more) to include a proportion of smaller units, including floorspace available at a discount to market rents. It is not clear whether this policy applies to all commercial developments over 2,500sqm or only where the retail floorspace is in excess of 2,500sqm. There is no justifiable evidence base to support this requirement and a lack of any detailed guidance and therefore it should be removed.

Chapter 10: Supporting Camden's communities

Policy SC1: Improving health and wellbeing

Part vii. requires development to be designed and constructed to meet WELL Building Standard. This is not a planning requirement and should be deleted.

Policy SC4 – Food Growing

Part ii. seeks to secure the provision of suitable space for on-site food growing. Whilst the principle of this is supported this is not a planning requirement and therefore it should be removed. If it is to remain it should form a component part of the open space requirement in Policy SC3.

Chapter 12: Design and Heritage

Camden's unique character and identity is what makes it the place it is today which is an attractive place to live work and visit. We strongly support the Council's aspirations for good design that supports that character.

Policy D1 – Achieving Design Excellence

Part A. We support the objective of achieving excellence in architecture, responding to climate change, improving the health and well-being of Camden's communities and celebrating the diversity of Camden's people and place.

Part C i.) states that where public spaces are provided as part of developments the Council will require that these spaces celebrate and reflect the diversity of the communities they are within through high quality interpretation, events, public art and decorative features codesigned with local people. Whilst there may be instances where co design is appropriate, we are concerned with this being a requirement of policy.

Draft supporting Paragraph 12.8 – refers to the use of architect retention clauses in legal agreements where appropriate. The retention of the architect by a developer post planning is driven by a number of factors. It should not be a decision for the local planning authority. The purpose is to ensure design quality which is controlled through the use of detailed design related conditions. This bullet point should therefore be removed.

Policy D2 - Tall Buildings

In line with the London Plan requirements, the draft Plan defines tall buildings and indicates where tall buildings are appropriate across the Borough. It defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough. The introduction of a new 'South Camden' area effectively seeks to extend the Central Activities Zone and the policies applicable to developments in the Central Activities Zone further north. It therefore seems reasonable for the 40 metre height threshold to be defined by the South Camden boundary rather than the Central Activities

Zone boundary. Given the Borough's central London location and appropriateness for development across the Borough which can deliver much needed economic growth and homes, we consider that there should be more reference to, and support for, high density development across the whole of the Borough.

General

In addition to the comments on each of the policies in isolation, there is general concern that the impact of the layering of policies and obligations, which are currently drafted with very little flexibility, will be extremely detrimental to the viability of development going forward. This will prevent Camden from achieving its vision set out in We Make Camden

We thank you again for the opportunity to comment on the draft Local Plan and look forward to discussing our representations with you further.

Yours faithfully,



Charles Begley

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charles.begley@cwpa.org.uk

ADDENDUM -London Property Alliance members includes:

- | | |
|--|-----------------------------------|
| AECOM | ING Media |
| Almacantar | Jackson Coles |
| Argent | John Robertson Architects |
| Ashurst | JLL |
| Avison Young | Kanda Communications |
| AXA Real Estate Investment Managers UK | KJ Tait Engineers |
| Barr Gazetas | Knight Frank |
| Bennetts Associates | Landsec |
| British Land | LaSalle Investment Management |
| Brookfield Properties | Legal & General |
| Buro Four | Lendlease |
| C C Land | Lockton UK |
| Cadogan Estate | Macfarlanes |
| Caneparo Associates | Make |
| CBRE | McLaren Construction |
| CBRE Global Investors | Mishcon de Reya |
| chapmanbdsp | Momentum Transport Planning |
| CO-RE | Montagu Evans |
| Colliers International UK | Ove Arup & Partners International |
| Core Five | Oxford Properties |
| Cushman & Wakefield | PDP London |
| DacBeachcroft | Pell Frischmann |
| Daniel Watney LLP | PLP Architecture |
| David Collins Studio | Point 2 Surveyors |
| Delancey | RBG Legal Services |
| Derwent London | Revantage Real Estate Limited |
| DP9 | Rolfe Judd |
| EDGE UK Management | RX London |
| EPR Architects | Savills |
| Eric Parry Architects | Scott Brownrigg |
| Exigere | Sheppard Robson |
| Farrer & Co | Sir Robert McAlpine |
| Fried, Frank, Harris, Shriver & Jacob | Skanska Construction UK |
| FTI Consulting | Stanhope |
| Gardiner & Theobald | TateHindle |
| Gerald Eve | The Mercers Company |
| Gleeds | The Office Group |
| Graham Constructions | The Townscape Consultancy |
| Great Portland Estates | Tishman Speyer |

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Turley Associates
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Woods Bagot

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TP Bennett
Trehearne Architects

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