

Planning Policy
Camden Town Hall,
Judd Street,
London
WC1H 8EQ

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By email only: planningpolicy@camden.gov.uk

27 June 2025

Dear Sir / Madam,

London Property Alliance representation to the Camden Local Plan Proposed Submission Draft April 2025

I am writing on behalf of the London Property Alliance (“LPA”) to respond to the consultation on the proposed submission draft of the Camden Local Plan (the “draft Local Plan”).

The LPA is a not-for-profit membership body and advocacy group representing over 300 of the leading owners, investors, professional advisors and developers of real estate operating across central London, providing a unified voice for the built environment. The LPA 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 area. The membership for both groups can be found in Appendix 2 and the full list of our members [here](#) and [here](#).

The LPA fully supports the London Borough of Camden’s vision to create a fairer, greener, healthier and more prosperous borough as set out in ‘We Make Camden’. However, the economically, environmentally and socially sustainable growth that underpins this vision cannot be achieved without a strong supply of office, work and laboratory space that can accommodate the next generation of talent, boost productivity, foster innovation and support the important growth industries that are located within Camden, particularly the ‘south Camden’ area that forms part of the Central Activities Zone (CAZ) and the Knowledge Quarter.

The planning system is a key enabler of growth and our research, *Good Growth in Central London*, revealed that a balanced approach to growth with flexible planning policy in Camden could unlock 45,100 jobs, 6,300 new homes and an additional 4.4m sq ft of office floorspace by 2045 – boosting the borough’s economy by £11.2bn (GVA) in addition to generating £268m in borough Community Infrastructure Levy (CIL) and Section 106 (s106) contributions.¹ This is on top of the £37.7bn (GVA) already generated by Camden’s service economy.²

However, Camden has seen a 51% fall in major office planning applications determined between 2013-2023.³ Whilst this is in part due to macro-economic conditions, the cumulative impact of the growing number

¹ [*Good Growth in Central London*](#), London Property Alliance/Arup, 2024.

² [*Regional gross value added \(balanced\) by industry: local authorities by ITL1 region \(current prices, pounds millions\)*](#), ONS, April 2025.

³ [*Good Growth in Central London*](#), London Property Alliance/Arup, 2024.

of planning policy requirements is increasingly making development unviable. This is out of step with the Government's growth agenda and the Mayor of London's ambitious London Growth Plan, both of which need central London's economic hubs to support the delivery of new jobs, homes and offices to drive Good Growth.

In addition to our concerns surrounding the cumulative impact of the policies contained within the draft Local Plan, some of which we do not support, it is important that the following are addressed:

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- Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) should not apply within the CAZ or the Knowledge Quarter, as it hampers development viability and does not reflect the unique nature and national economic importance of the Knowledge Quarter cluster.
- Policy CC2 (Prioritising the retention of existing buildings) is overly complex and fails to reflect the practicalities of delivering new development. It should be removed or substantially revised to align with strategic policy and government objectives.
- Whilst the amendments to Policy IE4 (Affordable and specialist workspace) following our earlier engagement are welcome, the targets contained within the draft Plan remain unrealistic, overly onerous and risk adding cost, delay and complexity to an already challenging planning process.

We also have concerns over the revised housing targets contained within the draft Local Plan, which are substantially lower than those set by the Government and Mayor. We would urge the Council to be more ambitious, reflecting the scale of the housing crisis.

We would like to thank the London Borough of Camden for its comprehensive engagement on the Plan throughout the drafting process, and value its ongoing commitment to working with the real estate industry to deliver sustainable development that will provide Camden with the homes, offices, retail and leisure amenities it needs.

We welcome the opportunity to comment on the draft Local Plan and look forward to continuing to engage with the Council as the Plan progresses. Our detailed representations can be found in Appendix 1.

Yours faithfully,



Charles Begley

Chief Executive, London Property Alliance

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NEWMARK

Appendix 1 – LPA representations to the Camden Local Plan Proposed Submission Draft April 2025**Overarching points**

1. **Complexity and useability:** The Government has expressed a desire for a more streamlined and simplified planning environment, including more accessible local plans that can be better understood by local communities. This is something we fully support and believe that the current length of the Camden draft Local Plan of 580 pages makes this difficult to achieve. We recommend streamlining the local plan so it can be better understood and implemented by all.
2. **Cumulative impact on development viability:** In addition to the below comments on each of the proposed policies in isolation, there is overarching concern that, whilst individually well-intended, the impact of the layering of more policies and obligations contained within the draft Local Plan will be extremely detrimental to the viability of development going forward, stifling development and hamper the delivery of new homes, floor and laboratory space and community amenities.
3. The planning system is already under significant strain, with the delivery of new development increasingly challenged by the growing complexity of regulatory requirements including those relating to the Building Safety Act, Biodiversity Net Gain and Whole Life Carbon. The proposed additional requirements in the draft Plan create an additional burden, adding substantial time, resource and cost to the preparation of planning applications, which risks further discouraging investment.
4. **Flexibility:** As currently drafted, the Local Plan contains little scope for flexibility or ‘on balance’ judgements that might enable the council to respond to changing economic conditions over the plan period.
5. **Conformity with regional and national plans:** The GLA is aiming to adopt the new London Plan in 2027/28 and the Government is looking to introduce National Development Management Policies (NDMPs) later this year. Therefore, the draft Local Plan needs to provide greater flexibility to deal with emerging national and regional policy updates.

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Chapter 1: Introduction

1. **Overarching points:** The draft Local Plan seeks to deliver on Camden’s corporate ambitions as set out in ‘We Make Camden’ and provides strategic objectives and a vision for development in the borough, which we support.

Chapter 2: Development Strategy

1. **The role of the CAZ:** We agree that there should be strong support for delivering new development within the Central Activities Zone (CAZ), growth areas, town centres and other major development locations within Camden.
2. Given its central London location, the whole borough ought to be considered capable of delivering new development and this should be reflected in the draft Plan. We suggest that a further paragraph is added below Figure 3 – Key diagram to state: *“Whilst the key diagram identifies the areas of main*

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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.”

3. **The role of the Knowledge Quarter:** As set out in the KQ2050 Strategy, the Knowledge Quarter has the potential to become the best place in Europe for collaboration, innovation and research, whilst fulfilling the social and economic potential for its residents. The critical role the Knowledge Quarter plays in delivering inclusive growth for the borough and London should therefore be emphasised in the draft Plan.
4. **Optimising land use:** We agree with the main principles of Policy DS1 which states that developments will be expected to optimise the use of land and make the best use of a site through mixed use development. However, mixed use development comprising residential and commercial floorspace is often not using land efficiently or making the best use of a site as it can lead to both uses being compromised, reducing the ability to optimise sites and deliver on local, regional and national objectives.
5. **Citizen Scientist contributions:** The draft Plan states that major applications will be required to contribute financially to the Council’s Citizen Scientist community research programme. There is a concern that additional financial contributions would place further burden on developments that are already struggling with viability. We would question whether this could reasonably meet the tests for s106 obligations as being necessary to mitigate the impact of development. We consider this unjustified and should be removed.

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Chapter 3: South Camden

1. **Consistency with the London Plan:** The Local Plan should be consistent with the London Plan (and the *Towards a new London Plan* document) where there is an emphasis on ensuring that CAZ is focused on economic development. As much of south Camden is located within the CAZ where the focus should be on growing and supporting the economic productivity of London, Policy S1 (Part A) should be reworded to say: *“The Council will ensure development in the south of the borough contributes to the area’s continued economic success...”* Moreover, employment and the economy should be ordered first and reference compliance with the London Plan.
2. **Housing:** Notwithstanding our comments on mixed use set out below, we support Policy S1 (Part G) 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.
3. We support Policy S1 (Part J) which acknowledges that the CAZ and Knowledge Quarter will continue to be the main focus of employment development in Camden. We also support Part K, which seeks to support the Knowledge Quarter to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy. However, 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.

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Chapter 7: Meeting Housing Needs

1. **Maximising housing supply:** There is a national mandate to deliver more homes, yet the draft Local Plan sets a target of 770 additional homes per year, which is significantly lower than the current local, regional and national housing targets for the borough.
2. The new London Plan is likely to set an updated target for the council. Whilst this is expected to be lower than the Government target of 3,137 additional homes per year, if the new target is in excess of the 770 proposed by the draft Local Plan, it will be inconsistent with both regional and national policy and should be amended to address this.
3. Policy H1 now supports other forms of permanent housing to meet more specific needs such as purpose-built student accommodation (PBSA) and housing for people with care or support requirements. This addition is welcomed and supported.
4. **Maximising the supply of self-contained housing from mixed use schemes:** Camden is the only London borough which still has a mixed use policy. It is in direct conflict with the London Plan and threatens to undermine the deliverability of commercial development in the borough. This impacts the commercial attractiveness of the area, particularly in contrast to other London boroughs who do not have this policy in place. Requiring housing from commercial-led schemes undermines other policy objectives in the Plan and the London Plan, particularly those promoting economic development within the borough, Central Activities Zone and Knowledge Quarter.
5. Whilst it is acknowledged that Camden is falling short of its annual housing targets and the delivery of self-contained housing is therefore a priority for the Council, we do not consider it appropriate or justified to require 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 do not support Policy H2.
6. The mixed use policy is also inconsistent with national policy as set out in the National Planning Policy Framework (NPPF) which states that significant weight should be placed on the need to support economic growth and productivity. Given the importance of the CAZ and Knowledge Quarter to the national economy, we do not consider that any mixed use policy should apply in these areas and therefore question the extension of the application of Policy H2 to the new 'south Camden' area. The Plan should recognise the specialist nature of the Knowledge Quarter developments including science and technology, the strategic objectives for this sector and the challenges that it has in delivering housing.
7. If a mixed use policy is to remain, it should focus on a financial contribution to be used on other council-owned housing developments in the borough rather than requiring housing to be provided on site or off site. This approach would allow for the delivery of employment space where it is most needed whilst still enabling the CAZ and Knowledge Quarter to support the delivery of new homes, in line with Policy DS1.
8. Alternatively, the policy could seek a financial contribution on small to 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, on site affordable housing is not required). 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, the council will prioritise the delivery of affordable housing.

9. 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. Page | 6
10. It is stated that off-site housing should be “as close as possible to the application site.” However, the opportunity to find an off-site location – particularly in the south of the borough – is rare and, if one is found, the cost of acquiring the site can render many schemes unviable. This is not acknowledged in Paragraph 7.60. Where an off-site solution is proposed, the site selection should be based on whether the site is appropriate to maximise the planning benefits of both the application and donor sites, in the context of the Local Plan.
11. **Maximising the supply of affordable housing:** Policy H4 (Part D) seeks to apply the affordable housing provisions of the London Plan for build-to-rent (BTR) housing, PBSA and large-scale 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 are welcomed.
12. 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 and the introduction of policy support for large-scale purpose-built shared living in line with the London Plan is welcomed and supported.
13. The draft Plan includes a new section on BTR and states that the council will be flexible in the application of affordable housing and dwelling size policies to the development of BTR housing where it considers such housing will help to create mixed, inclusive and sustainable communities. We support this flexibility.
14. The draft Plan acknowledges that additional student accommodation contributes not only to the student housing target but also to the overall housing target, addresses a permanent housing need and can reduce the pressure for students to share existing large homes. This introduction is supported and welcomed.

Chapter 8: Responding to the Climate Emergency

1. **Overarching points:** Whilst we fully recognise the climate emergency and support the council’s overarching aspirations relating to climate change, we consider that the policies contained within the draft Plan are too detailed and already covered at the national level in the latest Building Regulations and potentially through the emerging National Development Management Policies. This would accord with the Government’s intention to make local plans shorter and more concise.

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2. **Energy Use Intensity:** Furthermore, the Energy Use Intensity (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:

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“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.”

3. 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 and may therefore be considered unsound.
4. **Prioritising the retention of existing buildings:** Policy CC2 is more onerous than existing requirements. The new 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, which includes a requirement for the applicant to explore a range of alternative uses.
5. Policy CC2 (Part C1) acknowledges that there may be significant structural issues with an existing building that would prevent it from being retained. The policy should make clear that, in these circumstances, proposals for substantial demolition would be acceptable without needing to carry out the development options appraisal.
6. Policy CC2 (Part C2), which relates to the selection of the development options, should only apply where the condition and feasibility assessments conclude that there are no significant structural issues present. The policy also does not recognise that, in some instances, one or more of the development options (retention and retrofit; substantial refurbishment and extension; reclaim and recycle) may not be practically deliverable for a variety of reasons, including financial viability.
7. **Financial viability:** Financial viability should be specifically referenced within the wording of the policy and supporting text. Delivering the development is reliant, primarily, on

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investment from the private sector. In some instances, the commercial return associated with some of the options, particularly retrofit and substantial refurbishment, may be too low to enable developers to finance and pursue these approaches. Some interventions can involve complex and extensive physical works which are not only costly but may result in the provision of lower-value space, attracting lower rents due to compromises made in the design process.

8. Reviewing and testing all alternative options and permutations is likely to be prohibitively complex and expensive. The design work required would be very extensive and the time, costs and complexity of this may prevent some proposals from being considered and discourage potential investment, contrary to strategic objectives.
9. Overall, Policy CC2 as currently drafted is not positively prepared. It is overly complex and will produce uncertain development management outcomes. It is not likely to prove effective, in the context of plan-making for a location where growth is strongly supported, nor is it in general conformity with strategic policy. The policy needs to be reworded to address the concerns raised above or removed in its entirety for the reasons set out above.
10. **Minimising Carbon Emissions:** Policy CC4 states that developments should aim for the GLA aspirational benchmarks and, as a minimum, meet the GLA Whole-Life-Cycle Carbon standard benchmarks. We support the principle of setting evidence-based targets for developers and welcome the recognition in, Paragraphs 8.51 and 8.52 that these benchmarks set a range, however it should be noted that these targets may not always be achievable depending on the typology of the development and should therefore be applied flexibly, with supporting evidence where benchmarks cannot be met.
11. **Sustainability improvements to existing buildings:** The requirements in Policy CC5 are too prescriptive and, whilst it is recognised that these should be “appropriate to the scale or nature of the proposal,” further guidance on this should be provided to ensure the policy is sound.
12. **Energy use and the generation of renewable energy:** Draft Policy CC6 requires renewable energy generation on site to match, or be in excess of, the predicted annual EUI. Where a development is unable to achieve the quantity of renewable energy generation on site, the council will expect an offset payment which should be related to the scale of the shortfall, subject to viability.
13. This offset payment is currently inconsistent with the London Plan. There is no guidance on how this offset payment would apply to referable applications where the GLA adopts 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 s106 funding is being collected.

14. The study underpinning this fee in draft supporting Paragraph 8.87 presupposes extensive use of photovoltaics (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 considered 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 nor relevant London Plan policy, and would have a material, adverse effect on development viability in Camden.
15. **Overheating and cooling:** Policy CC8 (Part 4) 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 PVs. The office market, and not just specialist commercial uses, is likely to still require active cooling. Passive cooling measures often add cost and disrupt the environmental controls on floor, as well as creating operational/management issues. An acknowledgement of market demands and applying policy flexibly is important in encouraging commercial development.
16. Draft supporting Paragraph 8.77 should be reworded to read: *"Active cooling (air conditioning) and excessive mechanical plant may be acceptable where 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."*
17. **Sustainable drainage:** Policy CC11 (Part A) 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

1. **Overarching points:** We strongly support 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.
2. However, 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:
 - a. The planning system is not the appropriate vehicle to address the provision of childcare facilities to support working families. Policy IE1 (Part 11, we therefore question its inclusion.

- b. The market should dictate the need to provide digital connectivity to support occupiers. This is not a planning requirement and Policy IE1 (Part 12, we therefore question its inclusion.
3. **Offices:** We support the overarching aims of Policy IE2 to manage and protect Camden's office stock to ensure that suitable and viable accommodation is retained, and welcome 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.
4. 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 for Grade A space in the most accessible locations is high, but that demand is limited for secondary offices which are not well located and/or fail to meet modern occupier requirements for quality, flexibility and sustainability.
5. The reduction in the length of the marketing period required (from 24 to 12 months) to justify a loss of office space in Policy IE2 (Part C) is therefore welcomed. Reference to premises which cannot lawfully be leased due to their energy efficiency performance requirements is also welcomed.
6. Discounted rent and incentives are not a planning matter and are therefore unjustified and should be removed from Policy IE2 (Part C2).
7. 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 reference to this in Policy IE2 (Part C3) should be deleted.
8. 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 therefore be deleted from Policy IE2 (Part D). If it is to remain, there should be clarity on the quantum of affordable workspace required.
9. Where office buildings become redundant, the council's preferred alternative use is housing. This reference should be deleted as, in many cases, housing in the CAZ may not be the best use of land.
10. **Industry:** As currently worded, Policy IE3 is inconsistent with the strategic objectives of the draft Plan and national policy 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 (Policy IE3 (Part B)) with other land use priorities, in particular residential as "the priority land use in the Plan" (Policy DS1 (Part 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.

11. The policy should emphasise the need to promote the creation of jobs across a range of flexible E/B use classes rather than focusing 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 use classes have the potential to deliver greater social value/inclusive economic benefits.
12. **Affordable and specialist workspace:** It is welcome that, following our previous representations, Policy IE4 has been updated to clarify that the affordable workspace provision would be based on net additional floorspace, not gross. As is the cascade approach to this policy, which seeks on site provision first, then off-site and then a payment in lieu.
13. However, it is considered that 20% affordable workspace at 50% market rent is wholly unrealistic and this target should be much less onerous. The average affordable workspace delivered on schemes in Camden is usually less than 10% of the uplift in floorspace and at 80% of the market rent. Imposing yet further stringent policy requirements will lead to further protracted planning negotiations and delays in delivery.
14. Instead, the policy should be assessed on a site-by-site basis and factor in viability as well as other policy requirements. Developers often find themselves providing affordable workspace that they cannot let and then having to renegotiate the legal agreement leading to delays and costs. Imposing more stringent policy requirements will only exacerbate this further.
15. It is generally supported that the council will consider a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. However, any provision must be consistent with the definition of affordable workspace set out in the London Plan.
16. The council will also seek payment in lieu of provision where the affordable workspace provided would be less than 300 sqm (except in Hatton Garden), as it can be difficult to find occupiers for very small spaces. Occasionally, a blend of direct provision and payment in lieu may present the most suitable approach. This flexibility is supported.
17. More specific regard should be given to the 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. A more flexible approach should be taken to laboratory development which acknowledges the cost and specification required to set up affordable laboratory space, and that the skills required to run such spaces are significantly greater than standard affordable office space.
18. **Hotels and visitor accommodation:** Policy IE5 now limits large hotels (over 2,500 sqm GIA) to the CAZ, with smaller and medium-sized hotels allowed in town centres and mixed-

use areas within the CAZ. However, 'small' and 'medium' are not clearly defined. Most modern hotels need at least 80–90 rooms to be financially viable, which usually means they exceed 2,500 sqm. Hotels support local jobs and spending, and should be encouraged, particularly if redundant buildings are being re-used.

19. The draft policy seeks to apply the sequential test where additional hotel accommodation is proposed outside of a town centre. This flexibility is supported.

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20. **Supporting designated centres and essential services:** Draft Policy IE6 includes a new requirement for major developments providing 2,500 sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents. There is no justifiable evidence base or viability analysis to support this requirement and a lack of any detailed guidance and therefore it should be removed.

Chapter 10: Supporting Camden's communities

1. Policy SC5 (Part 2) seeks to secure the provision of suitable space for on site food growing. Whilst the principle of this is supported, it is not a planning requirement and therefore should be removed. If it is to remain, it should form a part of the open space requirement of Policy SC3.

Chapter 12: Design and Heritage

1. **Overarching points:** Camden's unique character and identity is what makes it the place it is today – an attractive place to live, work and visit. We strongly support the council's aspiration for good design which supports this character.
2. **Achieving design excellence:** We support Policy D1 (Part A)'s objective of achieving excellence in architecture, responding to climate change, improving the health and wellbeing of Camden's communities and celebrating the diversity of Camden's people and place.
3. Policy D1 (Part C2) 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 and this reference should be removed.
4. Draft supporting Paragraph 12.12 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.
5. **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. The introduction of a new 'south Camden' area effectively seeks to extend the CAZ and the policies applicable to developments in the CAZ further north. It therefore seems reasonable for the 40m height threshold to be defined by the

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south Camden boundary rather than the CAZ boundary. Given the borough's central London location and appropriateness for development across the borough which can deliver much-needed economic development and homes, we consider that there should be more reference to, and support for, high-density development across the whole of the borough.

Appendix 2 – Members of the LPA Knowledge Quarter Liaison Group and Camden Working Group

British Land - Michael Meadows
Derwent London – Richard Baldwin
JLL – Charles Pinchbeck
Landsec – Tim Trillo
Lendlease – Jenny Sawyer
Momentum – Roy McGowan
Newmark – Lisa Webb (Group Chair), Alex Neal and Natalie Davies
Oxford Properties – Robin Overall
Precis – Faaiza Lalji
Project Oriel – Keiran McDaid
Reef Group - Peter Langly-Smith and Stuart Deering
Stanhope – Charles Walford
St George – Claire Hammond and Greg Tillotson
Turley – Oliver Jefferson
London Property Alliance – Andrea Williams (Executive lead)