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13 January 2023

To Whom It May Concern

**Camden Local Plan Review
Consultation Response**

We write on behalf of the London Property Alliance, in respect of the review of the Camden Local Plan, which was adopted in 2017.

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 following. 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

Argent - Robert Evans/Alexandra Woolmore
British Land - Michael Meadows
Derwent London – Richard Baldwin
Gerald Eve – Lisa Webb (Chair) and Alex Neal
Groveworld – Ross Jacobson
JLL – Charles Pinchbeck
Landsec – Mike Nesbit
Lendlease – Phil Gould/Jenny Sawyer
Moorfields Eye Hospital – Kieran McDaid
Precis – Faaiza Lalji
Reef Group - Peter Langly-Smith
Stanhope – Charles Walford
St George - Greg Tillotson/Claire Hammond

The London Property Alliance comments are structured to follow the Camden Commonplace Consultation on the Local Plan Review:

Challenges and Opportunities

Should the Local Plan use the same vision as the Council's corporate strategy 'We Make Camden'?

We support the ambitions in Camden's corporate strategy "We Make Camden". The vision for the Local Plan should look to deliver on these ambitions and set out strategic objectives for development in the Borough.

What else should be included in the vision for the new Local Plan?

Strategic objectives should be set out as part of the vision for the Local Plan similar to the existing Plan, including promoting and strengthening Camden's housing delivery; its nationally important economy (including its pre-eminent knowledge economy); and the Central Activities Zone (CAZ) and key growth areas / town centres.

Sharing the Benefits of New Development

Do you have any comments on the Local Plan's current approach to delivering new development?

The Local Plan seeks to provide new development close to key transport nodes which accords with National Policy.

Whilst there ought to be strong support for delivering new development within the CAZ, growth areas, town centres and other major development locations, given the borough's central London location, the whole borough ought to be considered in principle capable of delivering new development.

What should our future Local Plan policies on delivering new development cover?

Local Plan policies should encourage infrastructure, housing and employment across the Borough in a sustainable way.

There should be a focus on delivering commercial schemes in the CAZ and knowledge economy schemes including life sciences within the Knowledge Quarter Innovation District (KQID).

In order to ensure the deliverability of development, a flexible approach should be taken to allow individual scheme circumstances (whether that be with regard to height, mass, use, or other policy requirements) to be taken into account.

There ought to be more certainty around financial contributions sought as part of the development, which should be evidenced and justified.

How can the Local Plan ensure that we are capturing and sharing the benefits of new development across Camden, to best meet the needs of our communities?

Existing and emerging Local Plan policy seeks to deliver community benefits from developments. Policy should ensure that such benefits are directly linked to the development and should be sufficiently flexible to take into account individual site circumstances. What is appropriate on one site will not necessarily be appropriate on another. This flexibility should also recognise the viability

and deliverability of development. When it comes to policy requirements such as housing and affordable workspace, policy should be flexible enough to allow off site provision and financial contributions in appropriate circumstances which could better meet the needs of local communities.

Housing and Communities

Do you have any comments on the Local Plan's current approach to housing delivery?

Housing is Camden's priority land use in its Local Plan. Policies should encourage high density housing development in appropriate locations across the borough and flexibly apply other land use and other development management policies in order to secure the housing delivery the borough needs.

Employment sites outside of the CAZ / KQID / town centres should not automatically be protected if housing development is proposed.

Focussing high density housing development in appropriate locations would enable Camden to support commercial development in the heart of central London, in the CAZ and in the KQID, enabling these parts of the borough to thrive for the benefit of the borough as a whole.

Existing Local Plan policy which requires housing from commercial schemes is increasingly challenging and threatens to undermine the deliverability of commercial development and the success of the CAZ and the KQID. Camden is the only borough which still has a mixed use policy, which threatens to impact its attractiveness when compared to other parts of the CAZ and other innovation districts.

If the KQID is to retain its premier status as London's leading innovation district, commercial development should be prioritised. If a form of mixed use policy is to remain in the Local Plan and be applicable to the KQID, it should focus on a financial contribution to be used on other Camden housing developments in the borough rather than an on site / off site requirement. That contribution could also enable the improvement of existing housing stock as well as the delivery of new homes.

What should our future Local Plan policies on housing delivery and housing need cover?

Policies on housing delivery as per the above.

In terms of housing need, Local Plan policies should address different types of housing types including specifically Build to Rent.

Camden recognises the need to retain and attract young people in the borough. Policy should accept that smaller units and studio flats for single persons would provide a more affordable form of private housing rather than focussing on larger (and by default, more expensive) units.

How can the Local Plan deliver more homes and make sure they meet the needs of residents in terms of housing type, size, accessibility and affordability in Camden?

Comments as per housing delivery above.

Policy should be sufficiently flexible on housing type and size to reflect up to date housing needs, which should be evidenced through regular housing needs surveys.

Climate Change and the Natural Environment

Do you have any comments on the Local Plan's current approach to climate change and sustainability?

Camden was one of the first boroughs to declare a climate emergency and have a retrofit first policy in its Local Plan.

Future policies should ensure that, whilst supporting retrofit first, they recognise that retrofit will not always be possible, or the best outcome, on every site, and allow for redevelopment in appropriate circumstances. Applications should be assessed on a case-by-case basis and take into account Whole Life Carbon Assessments, as well as the adaptability of a specific building.

This approach should be based on a full assessment and understanding of the benefits of both retrofit and redevelopment. The extent to which individual development proposals can achieve NZC and their whole life carbon effects, should also be weighed alongside the other planning and wider public benefits of the proposal. The assessment should be based upon the 'three pillars of sustainability' (Social, Environmental and Economic), and not the environmental pillar in isolation.

The policy approach should be flexible to ensure the best use of land so that homes (including affordable homes), jobs, and community benefits can be optimised together with environmental benefits. The LPA has produced research on this subject which it has shared with Camden Council under separate cover.

What should our future Local Plan policies on climate change and sustainability cover?

As per the above on retrofit first policies.

Policy should also consider the constraints of individual sites when assessing sustainability requirements, such as listed buildings, and enable a flexible, proportionate, approach to be taken having regard to the heritage significance of the building.

How can the Local Plan minimise carbon emissions, promote a circular economy, encourage the retrofit of buildings and maximise the use of renewable energy?

Camden's existing policies already address these areas. See comments on retrofit first above.

How can the Local Plan reduce surface water flooding, improve air quality and address overheating?

Camden's existing policies already address these areas.

Economy, High Streets and Centres

Do you have any comments on the Local Plan's current approach to economic development?

Existing Local Plan policy protects employment floorspace. In order to meet Camden's housing needs, employment sites outside of the CAZ / KQID / town centres should not automatically be protected if housing development is proposed.

Employment policies, whether protecting existing floorspace, or supporting new economic development, should have regard to jobs (number, types etc) rather than floorspace. They should also take into account the wide variety of land uses that provide job opportunities and not be too restrictive in terms of use, for example office, hotel, retail, educational uses all support job creation.

Policies should strongly support commercial development in the heart of central London, in the CAZ and in the KQID, enabling these parts of the borough to thrive for the benefit of the borough as a whole.

As mentioned in the above section on housing, existing Local Plan policy which requires housing from commercial schemes is increasingly challenging and threatens to undermine the deliverability of commercial development and the success of the CAZ and the KQID. Camden is the only borough which still has a mixed use policy which threatens to impact its attractiveness when compared to other parts of the CAZ and other innovation districts.

As also previously referenced, if the KQID is to retain its premier status as London's leading innovation district, commercial development should be prioritised. If a form of mixed use policy is to remain in the Local Plan and be applicable to the KQID, it should focus on a financial contribution to be used on other Camden housing developments in the Borough rather than an on site / off site requirement. That contribution could also enable the improvement of existing housing stock as well as the delivery of new homes.

Policy on affordable workspace needs to be flexible. Any target for affordable workspace should be evidenced and justified. Policy should be flexible so as to take into account individual site circumstances and deliverability and should have regard to the most appropriate type of space to be provided, size, affordability and tenure. Off site provision and financial contributions should be supported, which could better meet the needs of Camden's communities.

What should our future Local Plan policies on economic development cover?

As per economic development above.

How can the Local Plan deliver a strong, sustainable and inclusive local economy?

As per economic development above.

Development needs to be promoted and be deliverable in order to ensure a strong, sustainable and inclusive local economy. Policies should be sufficiently flexible to support development across the Borough.

Design Place Making and Movement

Do you have any comments on the Local Plan's current approach to design and placemaking?

Policies should encourage high density development in appropriate locations across the borough and flexibly apply other land use and other development management policies in order to secure the housing and economic development the borough needs.

In accordance with London Plan D9, tall building locations ought to be identified in the Local Plan and in individual site allocations. It would be preferable to include flexibility on heights rather than being prescriptive in order to take account of site-specific circumstances and so heights can be discussed through the planning application process.

As the heart of central London and London's premier innovation district, the CAZ and KQID as a whole should be identified as being suitable for tall buildings.

Policies should focus on place making as a whole and encourage and support inclusive, safe design ensuring all development is accessible to Camden's diverse communities.

What should our future Local Plan policies on design and placemaking cover?

As per design and placemaking above.

How can the Local Plan promote good design and shape public spaces in Camden to be safe, accessible and welcoming for everyone?

As per design and placemaking above. Fundamental to the design of spaces should be questions such as: who will use them, what are their needs, how can they feel welcome, how will the spaces make them feel, with the aim of delivering a public realm in Camden which is accessible, safe and contributes to the wellbeing of all of the borough's many communities.

A New Local Plan

How can we improve the design and layout of the Local Plan and make it easier to read?

The Local Plan ought to be concise, strategic and visual, with detail contained within the Camden Planning Guidance.

The plan should be wholly interactive.

How can we make the Local Plan more interactive and accessible?

As per design and layout above.

-Ends-

We trust that our representations will be fully considered. If you require any additional information or clarification on the above, please do not hesitate to contact me.

Yours faithfully,



Charles Begley

Chief Executive, London Property Alliance

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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
HB Reavis UK Ltd	Town Legal
Hines UK Ltd	TP Bennett
Hoare Lea	Trehearne Architects
HOK	
Hollis Global	

Tuffin Ferraby Taylor
Turley Associates
Waterman Group
Whitbread
White Red Architects
Woods Bagot

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