

Camden Development Policies

Local Development Framework



Camden Development Policies – Issues and Options

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How you can get involved

We want to hear your views on the issues and options for the future development of Camden. This consultation allows you to influence the direction of Camden's Development Policies at an early stage before we decide our preferred approach.

You can pass on your views in the following way:

- > comment on the issues and options raised in this paper.

Please reference your comments to the relevant question number. Responses should be sent to:

FREEPOST NAT15037
London Borough of Camden
Planning Policy and Information
Forward Planning Service
LONDON WC1H 8BR

or sent by email to ldf@camden.gov.uk

Responses must be received by **Friday 23 November 2007**

- > attend an area forum meeting at which some of the key issues and options in the Core Strategy and Development Policies consultation papers will be discussed;
- > get involved in later stages of the preparation of Camden's Development Policies.

Introduction

What is Camden's Development Policies?

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

Camden's Development Policies will support the **Core Strategy** (see below) by setting out the additional planning policies the Council will use when determining applications for planning permission in the borough.

This issues and options paper is the first stage in the preparation of our Development Policies "development plan document" (DPD). It:

- > examines what we think are key issues and challenges that will face the development of Camden over the next twenty years;
- > explores options that respond to these issues, in terms of the planning policies needed to deliver the Core Strategy; and
- > explains the relationship of the Development Policies to our other planning policy documents.

Other Local Development Framework documents

Camden's Local Development Framework will contain a number of other documents. These are:

- > **Core Strategy** – this will set out the key elements of the Council's planning vision and strategy for the borough. All of our other planning documents must be consistent with it. Consultation on issues and options for our Core Strategy is taking place alongside consultation on this Development Policies Issues and Options paper.
- > **Site Specific Allocations** – this will set out the Council's proposals for locations which will experience major development in the future.
- > **North London Joint Waste Plan** – this will set out policies relating to waste and identify sites for major recycling and other waste handling facilities in North London. It will be prepared jointly by Camden and the six other boroughs in the North London Waste Authority area.
- > **Supplementary Planning Documents (SPD)** – these documents will provide additional guidance on how the Council's planning strategy and policies will be implemented for specific topics, areas or sites. Although they will not form part of the statutory development plan for Camden, and will therefore not have the same weight in decision making, they will be important considerations in the Council's planning decisions.

A full list of the planning policy documents that Camden will be preparing over the next few years and the timetables for their production are set out in Camden's Local Development Scheme.

Other Camden strategies

Our Local Development Framework documents need to take into account other plans and strategies that influence the use of Camden's land and places. They will seek to contribute to achieve the vision of Camden's Community Strategy and other relevant strategies. Camden Together, the Council's Community Strategy 2007 – 2012, sets out the shared vision and strategy for the borough of the Camden and its partners.

Camden has many other strategies that cover the broad range of the Council's work. Strategies relevant to the Local Development Framework include the Housing Strategy, Safer Camden Strategy, Camden's Biodiversity Action Plan, Air Quality Strategy, Children and Young People's Plan and the Local Implementation Plan (LIP), which sets out Camden's transport objectives, schemes and programmes.

Sustainability Appraisal

We need to carry out a sustainability appraisal of the Core Strategy, Development Policies and other Local Development Framework documents. Sustainability appraisal promotes sustainable strategies and policies through an assessment of their environmental, social and economic impacts. This allows us to identify and minimise any potential harmful impacts and maximise beneficial impacts.

As the first stage of the sustainability appraisal we prepared a Scoping Report, which looks at the baseline information and plans, policies and programmes relevant to Development Policies. This was sent to statutory consultees for comment in line with the regulations. At the next stage in the preparation of our Development Policies we will carry out a full appraisal of the options considered in this paper and other options raised during consultation. The appraisal will inform the development of the Council's preferred options for Camden's Development Policies (see What happens next? below).

What happens next?

In preparing our Development Policies document we have to follow a process set by law which includes three rounds of public consultation. The stages in this process are set out below:

- > gathering background information;
- > consulting on key issues and options for the future of Camden;
- > developing the Council's preferred options and consulting on them, alongside the sustainability appraisal;
- > preparing the Development Policies document and submitting it to the government and for consultation ("submission");
- > a public examination where the document is assessed by an independent inspector;
- > publication of the Inspector's report;
- > adoption of the Development Policies by the Council.

It is expected that the whole process will take about three years. When the Council adopts the Development Policies it will, along with other Local Development Framework documents including the Core Strategy, replace the Council's current Unitary Development Plan. These will then, with the Mayor's London Plan, form the basis for planning decisions in Camden.

The next step is for us to consider what you tell us on the issues and options alongside the findings of the sustainability appraisal and the background information we have gathered. We will use these to develop our preferred options for the Development Policies. Consultation the preferred options will take place next year.

Issues and options

The remainder of this paper explores some of the key issues for the development of Camden's planning policies in the future and options for dealing with them. However, we need to comply with the policies of the government and the Mayor of London and the options we consider need to be realistic and able to be delivered.

We have identified issues from a number of sources, including:

- > the "evidence base" for the Local Development Framework;
- > the policies and plans of the government and the Mayor of London;
- > Camden's own plans and strategies, including the Community Strategy;
- > other relevant plans and policies; and
- > responses to Camden's Community Strategy and other consultations.

We have included a brief introduction to each issue covering, where relevant:

- > information on the situation in the borough;
- > the national and regional approach to the topic;
- > Camden's existing policies and strategies (particularly in the Unitary Development Plan 2006 and the Community Strategy); and
- > the outcomes of previous relevant consultations.

Please note that the inclusion of an option does not suggest endorsement of it by the Council at this stage. We have intentionally included a range of options, some of which may involve difficult choices. We also welcome suggestions for other relevant issues and/or options.

This Development Policies Issues and Options paper goes into more detail on a number of the issues covered in the Core Strategy Issues and Options paper, which deals with issues at the strategic level for Camden's future and is being published alongside this document. Please refer to the Core Strategy Issues and Options paper for further information.

WE WOULD LIKE TO HEAR WHAT YOU THINK

For each of the issues we would like to know which of the options you support.

We would also like to know:

- > do you think we have identified the right issues?
- > are there any other issues or options you think we need to consider?

We have grouped the key issues into themes, each with more specific topics within it:

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

1. Managing Camden's growth

Managing Camden's growth relates to strategic issues about where growth in the borough will happen, the form it will take and how we can make sure it works positively for Camden. As strategic matters, these are covered in the Core Strategy Issues and Options paper and therefore no issues for this theme are included in this paper, which focuses on more detail planning policy matters.

Please see the Core Strategy Issues and Options paper for more on the themes and how they relate to the vision set out in Camden's Community Strategy.

2. Providing housing and affordable housing

Good housing is strongly related to people's well-being in other aspects of their life, such as health, education, finding and keeping a job, and relationships with family and friends. Consequently, a key policy goal for national, regional and local government is to ensure that everyone has the opportunity to live in a decent home, in a place they want to be, at a price they can afford.

Government housing policy seeks to achieve an increase in housing supply, wider access to home ownership of housing, high quality affordable and market housing, quality housing for people who are vulnerable or have specific needs, and sustainable communities that include a range of household types. The London Plan sets targets for the supply of additional homes for London and for individual boroughs. The target for Camden to 2017 is 5,950, or 595 per year.

Local housing policies have focused on safe and sustainable communities, housing quality and maximising opportunities for those in greatest need, particularly homeless people and overcrowded households. Local planning policies have prioritised protection of housing land and maintaining the supply of a mix of housing for a range of household types, needs and incomes.

The Council's Core Strategy will set out the general principles of our approach to providing housing and affordable housing, while more detailed policies to be used when we assess planning applications will be included in the Development Policies document. The Core Strategy Issues and Options paper covers broader strategic issues relating to housing, for example our general approach to affordable housing, the size and type of homes provided and making the best use of existing housing, while this paper considers housing matters in more detail.

Consultation responses on Camden's Community Strategy indicated that housing was an important issue for residents, especially in terms of lack of housing that would meet people's needs at a cost they could afford. People suggested that one extra source of housing could be to use vacant space, not only in unused housing, but also offices and spaces above shops. The lack of affordable and family housing was an issue for middle income as well as lower income groups. Concern was expressed that the needs of existing residents should be prioritised over people arriving in the borough. People felt that existing housing stock needed to be protected and improved, and there were observations that the sale of Council housing through Right to Buy had led particularly to a loss of family homes.

During consultation on the Camden Housing Strategy in 2005 people saw more house-building as necessary, particularly for affordable housing. Encouraging private renting and moves to homes outside the Borough were not thought likely to significantly reduce the need for affordable housing. The consultation included discussion of how people in different situations could be persuaded to move into more suitable accommodation. Discussions dealt with people under-occupying family homes, older people needing care, and also people in hostel accommodation. The discussions placed emphasis on people having support to stay in their own homes for as long as possible, but also the need to support people who were going to move into different types of housing or areas.

Homes are the source of 30% of Camden's carbon emissions each year (Delivering a Low Carbon Camden Report). Planning can only implement measures to tackle this when new housing is built or significant works to existing homes take place. However, the Council is seeking to reduce carbon emissions from existing dwellings. For private sector housing, grants and loans are available such as Warmth for All and Eco Grants. For Council stock, the Council is producing energy ratings for each home, and incorporating insulation and efficient central heating where possible as part of major works. The Core Strategy Issues and Options paper discusses the promotion of higher environmental standards including energy efficiency, while issues and options for Development Policies include measures to tackle climate change.

Key references/evidence

- London Plan Housing Provision Targets, Waste and Minerals Alterations, Mayor of London; 2006
- Camden Housing Needs Survey 2004
- Planning Policy Statement (PPS) 3: Housing 2006.
- Draft Further Alterations to the London Plan; Mayor of London; 2006
- Camden's Housing Strategy 2005-2010
- Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007.

Issue 2a – Reducing overcrowding and influencing the mix of new dwellings

Government studies indicate that overcrowded housing adversely affects people's health and damages children's education. The 2001 Census found that 6% of Camden households had more than one resident per habitable room, compared with less than 2% nationally. Looking at the number of people per room for sharers and families, evidence for the 2005 Housing Strategy indicates that there were around 15,000 households living in overcrowded conditions, including about 5,000 in Council tenancies. During 2005-6, almost 2,000 people registered on Camden's housing waiting list to move from overcrowded housing. Of those newly registered on the waiting list, well over half sought 3 or 4-bedroom homes. However, the supply of newly built and vacated dwellings, particularly for larger households, is only a fraction of the need arising from overcrowding.

In the third quarter of 2006, the average price of a dwelling in Camden was 1.5 times the average across London, and more than 2.5 times the national average. Similarly, in November 2005 average weekly rents in Camden were 1.3 times the average across London. Consequently, people who are able to afford market accommodation make choices on the basis of a trade-off between having the appropriate number of bedrooms and being in a location that they find convenient.

At present, for market developments of new-build housing, Camden's planning policies simply seek a mix of units, including small and large units. For conversions of existing housing, policy seeks to protect one unit of 3-or-more bedrooms if one exists initially. At present, Camden has much more prescriptive guidance on the mix in affordable housing for rent, because it is much harder for social rent tenants to access housing in other boroughs – most of the need that arises in Camden has to be met within Camden. The borough is relatively small and easy to travel around, so current policies and guidance on the mix of dwelling sizes apply across the whole borough, taking very little account of the local characteristics of population growth.

Please see the Core Strategy Issues and Options paper for further consideration of housing mix.

We would like to know what you think

- Q1** Should we require a different mix of dwelling sizes in affordable housing compared to market housing?
- Q2** Is a different approach needed to the mix of housing for key workers and intermediate income groups?

Issue 2b – Housing that is not self-contained

There are two broad types of housing in the borough that are not self-contained, houses in multiple occupation (HMOs) and hostels. Houses in multiple occupation are buildings (or parts of buildings) where some facilities are shared, but the building is occupied by a number of separate households. Typically, they involve bedsits with sinks and limited cooking facilities, sharing kitchens or bathrooms. Hostels are buildings occupied by a large number of people who are not a household, but have a common characteristic – e.g. homeless people, nurses, and backpackers. They are usually actively managed to provide specifically for the type of people that occupy them. Historically, hostels were characterised by dormitories, but now they more commonly have small bedrooms (sometimes shared) with shared bathrooms and kitchens. The London Plan target for Camden includes 100 additional dwellings in the borough each year in the form of housing that is not self-contained.

HMOs or bedsits have traditionally provided a source of low-cost accommodation, particularly for young people leaving their family home for the first time, for people arriving in London for a new job, or for people in London for relatively short periods. Rental data from the GLA shows that bedsits remain significantly cheaper than self-contained studio flats. The average weekly rent of a studio in Camden between November 2002 and November 2005 was £165, compared with £119 for a non-self contained room.

As a consequence of the Housing Act 2004, most housing that is not self-contained must now be registered with the local authority and provide accommodation that meets a set of standards. A number of HMOs or bedsits are likely to need considerable investment to meet these standards, and as a consequence many properties are being sold. Often, they are being turned into a smaller number of flats or a single house occupying the entire building. This change requires planning permission, but it is likely that many changes will occur without the Council being made aware of them. Therefore it is expected that there will be a very substantial reduction in the stock of non self-contained accommodation.

The term ‘hostels’ refers to a much looser grouping of different types of accommodation. Depending on the characteristics of the occupier and the length of stay, they can have very different impacts on the locality, and occupy very different positions in the housing market. Hostels do not form a ‘class’ of uses that can change freely from one type of occupier to another in the way that, for example, shops do. The shift between one type of hostel occupation and another may therefore need planning permission, but may not if the local impacts and lengths of stay remain the same.

Camden has hostels funded by the Council and a number of charities for people who are homeless, some catering specifically for people with dependencies such as alcohol. The Council is moving away from the view of hostels as a long-term housing solution. Instead they are seen as part of a way back into general housing, where people can be equipped with the skills they need to return to a more independent lifestyle. The number of spaces in some hostels in the borough has already been reduced and it is likely that a number of hostels will be available for alternative uses in the future. Although hostels for homeless people are seldom seen as welcome neighbours, the uses that come forward in their place may raise new issues in terms of their impact on the locality.

Hostels for nurses and healthcare workers were once relatively common, but have virtually disappeared from Camden. Nurses are no longer attached to health trusts whilst in training, but are attached instead to higher education institutions. Student nurses now seek accommodation appropriate to students rather than to employees. Health trusts still try to assist healthcare employees in finding homes, particularly new recruits. However, the trusts report that hostel-type accommodation is hard to let, and much of it has been sold. Some trusts have sought to provide replacement accommodation with a greater degree of self-containment (e.g. the Royal Free Hospital). Others place greater reliance on arrangements with Housing Associations and on key-worker provision. Finding a suitable future use for the former nurses’ hostels has proved problematic.

Additional hostels for students continue to be provided by higher education institutions and also by independent providers. Rooms have varied facilities, and an increasingly common form is a small cluster of study-bedrooms around a shared kitchen-diner. Between 2004 and 2006, permission was given for 5 substantial new student hostels in the borough, only one of which was on an existing higher education site. These will collectively provide over 1,150 bedspaces for students, potentially releasing the same number of spaces in the general housing market. None of the sites permitted involved any direct provision of housing for the general market or general needs affordable housing, but student hostels are likely to form the only significant source of additional non-self contained housing in Camden in the next 10-15 years.

We would like to know what you think

- Q3** Should we try to retain bedsits with shared facilities as a source of low-cost accommodation or should they be allowed to be turned into self-contained dwellings?
- Q4** If bedsits are converted to self-contained dwellings, should we require the maximum number of small flats to be created in the converted space, or should we allow a number of bedsits to be converted into a much larger apartment or house?
- Q5** Should we treat all hostels in the same way or should there be different policies for different types of hostels?
- Q6** Should our policy allow a hostel to move from one type of occupier to another?
- Q7** Should a backpackers hostel be accepted as a replacement for a hostel that has been used for housing?
- Q8** If hostels for homeless people and other special groups are no longer needed, should we allow them to change to another type of hostel? or should we allow homeless hostels to change to market housing, or only low cost housing?
- Q9** Should policy allow nurses' hostels to change to another type of hostel?
- Q10** Should policy allow for nurses' hostels to be replaced by market housing, or only key worker housing?
- Q11** Should a less restricted type of low cost housing be accepted?
- Q12** Should we encourage the provision of hostels for students?
- Q13** Should developments of student hostels have to include housing for the general population? Should they have to include affordable housing?

Issue 2c – Providing housing for older people

The number of people over 75 in Camden is projected to grow slowly but steadily in Camden over the next 10 years. In the context of overall population growth, the change is small, from approximately 12% in 2006 to 13% in 2016. Current provision of sheltered accommodation and care homes in the borough is not adequate to fully meet the scope of existing or future needs.

The government introduced a National Service Framework for Older People in 2001. Elements of this are promoting independence and fitting services to people's individual needs. Camden responded initially with a number of separate strategies, and more recently a joint strategy with the Camden Primary Care Trust, *Serving Older People 2004*. In terms of housing measures, the strategy aims to ensure that people can live at home for as long as possible, and have access to accommodation that is appropriate in terms of needs, culture and preferences.

The Serving Older People strategy is geared heavily to arrangements for people to receive care and support without having to move from their homes. As a principle, it states that if older people do need to move for care and support, they should not need to move more than twice. For this principle to become practice, the range of specialist housing available would need to be sufficient in scope to meet an individual's needs as they change.

There are four types of specialist housing for elderly people who move out of the homes they have occupied when younger:

- > sheltered housing is generally housing designed to be easy for older people to live in independently but with emergency help available, usually developed as a cluster or block, often with some communal provision such as a lounge or guest accommodation.
- > nursing care homes provide for people who need constant care from qualified nurses, but do not need to be in a hospital.
- > residential care homes provide for people who can no longer cope with day-to-day activities at home, such as preparing meals, washing clothes and bathing. They usually have individual or shared bedrooms and communal rooms for dining and leisure.
- > extra-care sheltered housing is supported housing where people can live independently in self-contained flats, but flats are adapted for assisted bathing, communal meals are available, and care staff are available to provide a variety of services from shopping to 24-hour care. This form of accommodation is particularly appropriate to meet needs that change over time, for example people suffering from dementia.

There are around 465 residential care home places in Camden. Around half of these are affordable places funded by the Council. The Council also funds almost as many places outside of the borough, some in other parts of the country where people may want to move for personal reasons, with around 150 spaces in neighbouring boroughs. A significant proportion of the people placed in neighbouring boroughs have indicated a preference for a place in Camden.

There are around 150 sheltered housing flats with public or Housing Association funding in Camden, and a further recently completed 35 extra care flats. Camden also funds almost 200 nursing home places, the majority of which are not in the borough. Camden aims to improve the scope of accommodation and reduce the need for people to move home twice by:

- > providing more extra-care sheltered housing (this is likely to include some conversion of existing care homes and sheltered housing);
- > enabling care homes to register as dual providers of residential and nursing care; and
- > encouraging independent providers of nursing care homes to make the best use of places and to provide additional care homes.

We would like to know what you think

- Q14** Should the Council consider planning measures to make it easier to invest in housing for elderly people?
- Q15** Should sheltered housing and care homes be given priority in the development of underused sites in some locations? If so, which locations do you think are suitable?
- Q16** Should sheltered housing and care homes be treated as equivalent to affordable housing provided a certain proportion of spaces are available to Council nominees at an affordable cost?
- Q17** Should we encourage housing for elderly people to be developed in particular parts of the Borough? If so, which places do you think are most suitable?
- Q18** Should housing for elderly people be provided primarily where there is existing provision and support services or primarily where population projections suggest that the biggest demand will be?
- Q19** What else should we consider in identifying sites for sheltered housing and care homes?

Issue 2d – Other housing for people with special needs – the supporting people programme

The Government introduced the supporting people programme in 2003, aimed specifically at providing vulnerable people with a stable environment in which they can enjoy greater independence and improve their quality of life. The Supporting People programme in Camden has been developed in partnership between the Council, the Primary Care Trust and the London Probation Service.

In 2004/05, supporting people funding was spent primarily on services for the homeless people and homeless families, older people, and people with mental health problems. Services were also provided to young people leaving care or otherwise at risk, people with learning difficulties, people with HIV/ AIDS, and women at risk of domestic violence.

Two types of service are involved, housing-based support (that is, support involving the provision of accommodation where people's needs can best be met) and floating support, provided to people wherever they live at the time. In line with the government's aim of promoting independence, and the approaches adopted in the Camden Housing Strategy 2005 towards homelessness and older people, the balance between the types of service is shifting towards providing floating support to people living in their own homes, rather than support in institutional environments.

To deliver the programme, changes will be needed to the types of accommodation that are still provided where people are unable (either temporarily or permanently) to be supported within general purpose housing. As well as changes to hostels for homeless people and sheltered housing and care homes, the Supporting People Business Plan for 2005-2010 indicates a need for supported living units for people with learning difficulties (in place of some current care accommodation) and also for supported accommodation for released adult offenders. However, proposals to alter accommodation are currently focused on hostels for homeless people and residential care homes for older people (see Issue 1C above). Existing planning policies are supportive towards adapting residential care homes for other residential uses, provided that any places that are affordable (rather than places provided at market cost) are retained in the altered provision.

The Supporting People programme is not involved in providing homes for people with mobility difficulties. Please see the Core Strategy Issues and Options paper for further consideration of this matter.

We would like to know what you think

- Q20** Should the Council consider additional planning measures to assist the provision of housing for people with special needs?
- Q21** If so, what measures do you think should be considered?

Issue 2e – Decent homes

The government aims to ensure that all social housing reaches a decent condition by 2010. Government assesses housing condition by reference to Decent Homes standards. A decent home is fit for habitation in terms of health and safety, is part of a building in a reasonable state of repair, has a reasonably modern kitchen, bathroom and layout, and has suitable heating. The government decided not to provide funding to bring Camden homes up to a decent standards when tenants voted not to shift management of their housing from Camden to a new landlord.

Consequently, Camden has devised an alternative draft plan to finance repair and maintenance to council houses. This involves options to dispose of a limited number of properties when they become empty (both residential and commercial), and to consider regeneration initiatives for estates which require very costly repair works, potentially replacing existing housing, adding new housing, and adding to community facilities. Draft options were submitted to the Government in May 2007. Consultation and discussions with residents about funding repairs and improvements will continue through late summer and autumn, and on the basis of these discussions the Council will produce a final assessment of the options for the government in December 2007. As a result, the options for bringing Camden's council housing up to Decent Homes standards are not being considered as part of the consultation on Development Policies. However, we will reflect the Council's finalised strategy for decent homes in later stages of the production of our planning strategy and policies.

3. Promoting a sustainable Camden and tackling climate change

SUSTAINABLE USE OF RESOURCES

The world's natural resources are currently being used, and pollution created, at an unsustainable rate. That is, resources are being used faster than they can be regenerated and pollution is being created faster than it can be absorbed through natural processes. We are increasingly seeing the harm to the environment that this causes. Climate change is recognised as the most serious of the issues affecting the environment and the way we live.

National and regional planning policies encourage the efficient use of resources, especially of carbon-based energy and water. Government policy states that sustainable development is the core principle underpinning planning. The government has set a target to reduce carbon dioxide emissions by 20% below 1990 levels by 2010 and 60% by 2050. In addition the government has set a target to generate 20% of electricity from renewable sources by 2020. The draft Further Alterations to the Mayor of London's London Plan place mitigation of, and adaptation to, climate change as a priority, with a focus on decentralised energy as a way to reduce carbon dioxide emissions.

Camden has adopted a Climate Change Action Plan which states that the Council will aim to achieve the national carbon dioxide emission reduction. During consultation on Camden's Community Strategy there was significant support for protecting the environment for us now and for future generations. There was strong support for a proactive approach to protecting the environment and tackling climate change and people wanted it to be easier for them to make their contribution. Many recognised that environmental concerns were too big for Camden to address alone.

The Council's Core Strategy will set out the general principles of our approach to reducing Camden's environmental impact, while more detailed policies to be used when we assess planning applications will be included in the Camden Development Policies document. The Core Strategy Issues and Options paper covers broader strategic issues relating to promoting a sustainable Camden and tackling climate change, for example our general approach to encouraging high environmental standards, sustainable transport and waste, while this paper considers these matters in more detail.

Key references/evidence

- Delivering a Low Carbon Camden – Carbon Reduction Scenarios to 2050; SEA-Renue; 2007.
- Climate Change in Camden – A Joint Effort; Camden's Climate Change Action Plan 2006 – 2009
- Camden Sustainability Task Force Report on Energy and Energy Efficiency; 2007-09
- Draft Planning Policy Statement: Planning and Climate Change; DCLG; 2006
- Planning Policy Statement (PPS) 22: Renewable energy; ODPM; 2004.
- Draft Further Alterations to the London Plan; Mayor of London; 2006
- The Code for Sustainable Homes – A step-change in sustainable home building practice; DCLG; 2006

Issue 3a – Sustainable design and construction

Sustainable development involves meeting our social, environmental and economic needs in ways that protect the environment and do not harm our ability to meet our needs in the future. Buildings use resources directly in their construction and indirectly through ongoing occupation, access and maintenance.

Sustainability includes the efficient use of land through appropriate density of development and locating complementary land uses close to each other. The issue of density and the mix of uses are covered in the Core Strategy Issues and Options paper. Sustainable development also involves appropriate orientation and design to maximise the comfort of occupiers without a high demand for winter heating and summer cooling. The choice of materials can affect the overall environmental impact of a building due to the energy required to produce and transport the material and how well or poorly the material insulates the building allowing it to retain heat when required. Also energy and water efficient appliances can help occupiers use fewer resources than existing buildings.

Camden's Unitary Development Plan (UDP) 2006 covers a wide range of issues relating to sustainable design including accessibility, density, mixed use, use of resources, pollution and disturbance and hazards, along with traditional design requirements such as building lines, bulk and scale. Further detail on Camden's approach to sustainable design and construction is found in the Camden Planning Guidance.

The UDP 2006 suggests the use of BREEAM as a measure for sustainable design and construction. BREEAM is the Building Research Establishment's Environmental Assessment Method, which is used to assess the environmental performance of buildings. Credits are awarded in seven categories, resulting in a development achieving a rating of either Pass, Good, Very Good or Excellent. The Building Research Establishment also developed the EcoHomes method to assess the performance of houses. The Council currently expects a rating of 'very good' or 'excellent' as well as a specified performance in the categories of Energy, Water and Materials. We currently require the relevant developments to achieve at least 60% of the credits in Energy and Water and 40% of the credits in Materials.

The government has since introduced its Code for Sustainable Homes, an alternative assessment method. This sets standards for energy consumption, water consumption, the sustainability of materials, surface water run-off, the provision of waste storage facilities and the requirements of a site waste management plan. The government has stated that Level 3 of the Code is considered to be generally the same as achieving a 'very good' rating under EcoHomes. From 2008 all affordable housing with funding from the Housing Corporation will be required to meet Level 3 of the Code. The government has also stated that by 2016 all new housing should be carbon neutral, which equates to Level 6 of the Code. However, currently assessment against the Code for Sustainable Homes is voluntary.

We would like to know what you think

- Q22** Should sustainability and/or climate change be the overriding principle for all new development in Camden, including above design considerations, or should these issues be given equal weighting to other matters?
- Q23** Should we continue to use BREEAM assessments/the Code for Sustainable Homes as tools to measure overall sustainability?
- Q24** Should our target for the performance of new development remain as 'very good' or 'excellent' for BREEAM assessments/Level 3 or above for the Code or should this be increased to 'excellent'/Level 4 or above?
- Q25** Should we raise the standard required over time to encourage better environmental performance as technology increases?
- Q26** We currently require BREEAM assessments for schemes of more than 1000m² and assessment under the Code for Sustainable Homes for schemes of 5 or more homes. Should these thresholds be changed? If yes, to apply to larger or smaller developments?

Issue 3b – Tackling climate change

ENERGY AND CARBON USE

Climate change is widely recognised as the most serious threat to our environment and health. The government has set a target to reduce carbon dioxide emissions, which contribute to climate change, by 20% below 1990 levels by 2010 and 60% by 2050. In addition it has set a target to generate 20% of electricity from renewable sources by 2020.

In his Climate Change Action Plan, the Mayor of London has set targets for the reduction of carbon dioxide in London of 60% by 2025. However given the Mayor's limited ability to influence the use of carbon, the Plan acknowledges that it is likely that only a 30% saving can be achieved from 1990 levels unless new government legislation is introduced to tackle carbon emissions.

Camden is estimated to produce 1,774,000 tonnes of carbon a year. Domestic buildings account for 30% of this figure, non-domestic buildings 58% and transport 12%. Unless changes are made, these emissions are expected to grow by 12.5% for dwellings, 1.5% for non-domestic buildings and 47% for transport by 2050 (*Delivering a Low Carbon Camden Report*).

ENERGY EFFICIENCY

In order to reduce carbon dioxide emissions from the use of energy, a building should enable occupiers to consume less energy for lighting, heating and cooling. These can be achieved through the orientation and design of the building, the materials used and the inclusion of energy and water efficient equipment. There are no large community heating systems or decentralised energy generation systems across the borough, but there are some examples of community heating within the Council's housing estates and University College London. Please see the Core Strategy Issues and Options paper, made available for consultation alongside this document, for further consideration of issues related to decentralised energy.

RENEWABLE ENERGY

The Council currently seeks developments that are energy efficient and expects major developments to generate 10% of the site's energy needs from renewable sources. Most residential developments achieve this target; however the more dense the development the harder the target seems to reach, unless biomass is used to either fuel a conventional style boiler or a Combined Heat and Power (CHP) unit. Biomass is produced from organic materials, either directly from plants or indirectly from industrial, commercial, domestic or agricultural products. A CHP unit is one that produces heat and power, usually electricity from a single fuel source such as gas or biomass. Whilst biomass is currently being accepted as a renewable energy supply, some consideration needs to be given to the sustainability of the source and its distance from where it is produced to where it is used. The burning of biomass can further harm already poor air quality in parts of the borough (e.g. Central London) due to the release of small particulates.

The draft Further Alterations to the London Plan seek to reduce carbon dioxide emissions from developments by 20% through the use of on-site renewable energy.

PLANNING AHEAD FOR CLIMATE CHANGE

Climate change is expected to result in hotter summers, wetter winters, more frequent extreme high temperatures and a potential increase in winter storms. These changes in the climate will have implications on how areas should be planned, what particular sites should be used for and how buildings should be designed to cater for future weather conditions. For Camden the potential increases in localised flooding, changing soil conditions and landscaping, and providing for the needs of biodiversity are particular issues.

Much of the focus to date on energy conservation has been through better insulating buildings, as heating accounts for a large proportion of a building's energy consumption. However, there is an increasing demand for mechanical ventilation or air conditioning which consume lots of energy. Therefore the design and fit-out of buildings need to consider future climate conditions in order to make sure that buildings built today will not consume a disproportionate amount of energy in the future. This is a particular issue for Camden as a lot of new development consists of flats which only have windows facing one direction. Therefore they are only exposed to a breeze coming from one direction which makes it more difficult to cool the building naturally.

We would like to know what you think

- Q27** Should planning applications need to demonstrate how their design (e.g. orientation, floorplate size, floor to ceiling heights, location of windows, inclusion of green/brown roofs, materials) will reduce the need for mechanical heating, cooling and lighting for the lifetime of the development?
- Q28** Should developments have to justify why they are using mechanical ventilation, such as air conditioning, rather than natural systems?
- Q29** Should we continue to require developments to obtain a minimum percentage of the available credits in BREEAM/EcoHomes/ the Code as a tool to demonstrate how energy efficient a development is? (An explanation to this can be found in Section 1A.) Should the target be strengthened or weakened?
- Q30** Should the acceptability of biomass be limited given the limited amount of biomass available from within Camden and its cumulative effect on air quality?
- Q31** If biomass is an unacceptable form of fuel in areas with especially poor air quality, will achieving a target of 20% of a site's energy from renewable sources be realistic in Camden? What would an appropriate target for on-site renewable energy generation be?

We would like to know what you think *continued*

- Q32** Should the target be stepped depending on the size of development?
- Q33** Where developments have justified why they cannot meet the on-site renewable energy target on-site, should we allow them to make a carbon reduction contribution in another way, for example, by installing a CHP plant that is fuelled by gas or by making a financial contribution to make existing buildings more energy efficient?
- Q34** Should developments have to be designed to take into account the potential effects of climate change such as potential flooding, more storms and less water availability and hotter summers?

Issue 3c – Materials

Materials used in new developments can be finite such as Portland and York Stone, sustainably sourced such as timber or recyclable such as glass, reclaimed timber and some plastics. In addition, all materials have an “embodied” energy from the energy used to extract and make them and the energy used in their transportation. Camden has no aggregate sites or quarries. Therefore nearly all raw materials for construction come from outside the borough.

The materials used in a building influence how much energy it will use. For example, although it is energy intensive to produce, concrete has a high thermal mass so it keeps heat within a building and can protect against heat in the summer, if the building is designed correctly.

Camden’s Unitary Development Plan (UDP) 2006 has a policy to reduce the use of resources through the choice of materials and through energy efficiency. In addition we expect that certain developments over a certain size achieve 40% of the credits in the Materials category of BREEAM/Code for Sustainable Homes assessments (see issue 1a above for further details). This has been shown to be generally achievable in developments in Camden.

We would like to know what you think

- Q35** Should we continue to use BREEAM assessments/the Code for Sustainable Homes as tools to measure how sustainable the materials used in a development are? Should we increase the standard we require?
- Q36** Should developments be encouraged to re-use materials already on site? if so, should this apply to all developments or only those over a certain size? Would a plan or statement explaining what the developer is going to do with existing materials on-site and where they will be stored if they are to be re-used or recycled on-site be an acceptable method to secure this?

Issue 3d – Water

WATER EFFICIENCY AND CONSUMPTION

Average household demand for water has increased by 55% over the last 25 years, mainly due to changes in lifestyle, home comfort and an increasing range of water-using appliances. It has been estimated by water companies that household use of water could increase by a further 12% over the next 25 years, unless action is taken to reduce this demand. People in the UK consume an average of approximately 150L of water per day. In London this figure increases to 160L per day. The growing population and hotter weather will both increase demand for water, while there is also the potential of less water availability due to decreased rainfall caused by the effects of climate change. There are limited figures for workplace consumption given the broad range of business use of water. However the *Water Efficiency in New Buildings Consultation Paper* suggested a whole of building performance standard of 20L per full time employee.

Planning has a limited influence on the internal construction and performance of a building and the non-fixed items within it. However, there are certain measures that could be included in any design over which planning can have some influence. These include green/brown roofs, water storage tanks, plumbing for water collection and reuse. In addition an overarching tool such as a BREEAM assessment/assessment under the Code for Sustainable Homes can be used to assess the water consumption of a development.

The Unitary Development Plan (UDP) 2006 has a strong policy on water efficiency and we expect development to obtain 60% of the credits in Water within BREEAM/EcoHomes assessments. To reach Level 1 of the government's Code for Sustainable Homes, a dwelling should enable an occupier to reduce their consumption to 120L per day. This reduces to 105L per day for Code levels 3 and 4 and 80L per day for Code levels 5 and 6. This is stricter than the BREEAM/EcoHomes targets and the mayor's SPG on Sustainable Design and Construction. Please see Issue 1a for further details on these environmental assessment methods.

RUN-OFF AND FLOODING

No part of Camden currently features on the Environment Agency's flood maps and the risk from sea level rise due to climate change is relatively low due to the existing River Thames defences. However, there is a potential for an increase in winter storms and the intensity of rain storms, which could result in localised flooding in the borough. We are currently undertaking a Strategic Flood Risk Assessment to see if any of Camden is particularly prone to flooding.

Some parts of the borough are affected by underground rivers and streams, such as the river Fleet which runs below parts of Dartmouth Park. Works below ground near these underground rivers and streams could alter the way they flow and the local drainage patterns. Options relating to below ground development are addressed in Issue 3I – Basements. Please also see Issue 2I – Residents' parking for consideration of the effect of paving gardens to provide parking.

Flooding can be minimised by the use of sustainable urban drainage systems (SUDS). These are measures that slow down the rate of water flow from a site. Water is generally slowed or retained on site so it will not affect properties downstream. Such measure can include natural methods such as swales, green/brown roofs, green landscaping in general, and on-site detention ponds. Engineering methods include the installation of tanks which store water and release it slowly.

We would like to know what you think

- Q37** Should we set targets for water consumption within buildings?
- Q38** Should we continue to require development to obtain 60% of the available credits in BREEAM/ The Code for Sustainable Homes in new developments as a tool to demonstrate how water efficient a development is?
- Q39** Should we require developments to include rain water capture, for example water butts for small developments and water tanks for larger schemes, green and brown roofs, and/or sustainable urban drainage measures?

Issue 3e – Waste and aggregates

London currently produces 18.1 million tonnes of waste every year and this is forecast to rise to 23.6 million tonnes in 2020. Camden collects over 134,000 tonnes of municipal waste every year, around 85,000 tonnes of which is from households. None of the waste currently collected within Camden is disposed of or recycled within the borough. The London Plan expects the capital to take responsibility for dealing with its own waste as far as possible.

Camden and the six other boroughs in the North London Waste Authority are producing a Joint Waste Plan which will include policies and identify locations for waste management facilities to deal with the area's waste. Please see the Core Strategy Issues and Options paper for further information.

AGGREGATES AND CONSTRUCTION WASTE

On the basis of the policies set out in *Waste Strategy for England 2007*, levels of commercial and industrial waste sent to landfill are expected to fall by 20% by 2010 compared to 2004. The government is considering a target to halve the amount of construction, demolition and excavation wastes going to landfill by 2012 through waste reduction, re-use and recycling.

Over 80% of construction materials come from natural resources like aggregates, timber or clay. Yet, each year the construction industry generates 109 million tonnes of waste, according to the Department for Environment, Food and Rural Affairs (Defra). In most cases over 85% of demolition materials can be reduced, reused, reclaimed or recycled. London especially, supplies a very low percentage of its own needs for materials used in construction. Therefore there is a need to encourage the recycling of material generated from the demolition of buildings and limit waste on building sites.

There are currently no aggregates sites within Camden, however a site at King's Cross is identified and protected for facilities handling aggregates. Camden's Unitary Development Plan (UDP) 2006 has a general policy on the re-use and recycling of construction waste but contains no specific targets.

STORAGE FOR RECYCLABLE MATERIALS AND WASTE WITHIN BUILDINGS

EU Directives and the Mayor's Municipal Waste Management Strategy require boroughs to reduce the amount of municipal waste that is sent to land fill. Camden collects over 134 000 of municipal waste every year, around 85 000 tonnes of which is from households. Recycling in the borough has been increasing. We achieved a recycling rate of 27% in 2005/6, the highest for inner London, up from 16% in 2003/4. Camden has a range of services and facilities to help people reduce waste and re-use and recycle. While the borough performs well in recycling, it does not currently collect green/organic waste. Planning can play its part to encourage recycling and composting on-site by making sure new homes have adequate and easily accessible storage spaces for recyclable materials and compost bins or worm farms.

We would like to know what you think

- Q40** Should developments be encouraged to re-use and recycle materials from other development sites and use materials which are made by recycled products? Should this apply to all developments or only those over a certain size? Would a plan or statement explaining where materials come from be an acceptable method to secure this?
- Q41** Should we specify the amount of space needed for recycling and waste storage in new homes?
- Q42** Should developments have to include space for composting/worm farms?
- Q43** Should we continue to safeguard a site at King's Cross for handling aggregates?

SUSTAINABLE TRANSPORT

One of the key themes in Camden's Community Strategy is protecting and enhancing the environment for the present and the future, whilst adapting to a growing population. Among the measures that the Council and its partners intend to take to meet this aim are reducing pollution from transport through both reducing the volume of traffic, promoting the use of cleaner vehicles, and the promoting walking, cycling and public transport.

Transport is responsible for over a quarter of the UK's carbon emissions, which contributes towards global warming. Also emissions from motor vehicles damage local air quality – Camden has some of the poorest air quality in London.

During consultation on the Community Strategy there was support for discouraging unnecessary car usage, but on the basis of investment in alternatives to improve accessibility, reliability, frequency and safety. Concerns were expressed about the danger to pedestrians from traffic, and also about cyclists using pedestrian areas.

Consultation on Camden's Local Implementation Plan, the document which sets out Camden's proposed 5-year investment programme for transport schemes, identified a widely held belief that reduced traffic volumes and speeds would encourage walking, cycling and public transport use. There was strong support for 20mph zones outside schools, and support for 20mph zones in residential areas, but little support for them elsewhere. Enforcement by the police and cameras was favoured over physical methods of traffic calming. Segregated cycle lanes were supported and considered to be effective, un-segregated cycle lanes were not. Zones for pedestrians and cyclists only were supported, as was high quality maintenance of streets and public spaces.

Policies at national and local level have sought to reduce the need to travel and the length of journeys and also promote more sustainable means of transport as an alternative to the private car. Measures have been introduced at the London wide and borough level to improve conditions for pedestrians and cyclists, and to improve the safety and reliability of public transport and interchange between the walking and public transport elements of journeys.

The broader strategic issue of promoting efficient transport with reduced environmental impact is covered in the Core Strategy Issues and Options paper, while this paper addresses more detailed, development-related sustainable transport issues.

Key references/evidence

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

Issue 3f – Encouraging more sustainable travel

Walking and cycling are the most environmentally sustainable forms of transport and also benefit health. Making it easier to use walking and cycling to get around is a positive way to promote more sustainable travel choices.

Levels of cycling have increased dramatically over the last decade in both London and Camden. The number of bicycle trips made by Camden residents rose by 98% between 1991 and 2001 and the Council is seeking to increase cycling by 80% above 2001 levels by 2011.

Research suggest that walking accounts for nearly half of trips by Camden residents, compared to 28% of trips by central London residents (London Area Transport Survey, 2001) and 25% of trips in Great Britain (National Travel Survey, 2004). The numbers of people walking to work in Camden has fallen slightly but walking to school has increased (London Area Transport Survey, 2001).

Walking is involved in almost every journey, but many people prefer not to walk due to concerns about safety, security and the quality of the environment. Initiatives that can boost walking include new and better facilities for crossing roads, better signage and “way-finding”, better lighting, improved air quality and more enjoyable public spaces.

Nationally, road transport is growing, but this growth is not reflected locally. In the 10 years to 2005, road traffic flows in London increased by 5%, while in LB Camden flows fell by 15% (Camden Annual Monitoring Report 2005/6).

Some parts of the population, such as children on school journeys, disabled people and elderly people, may find standard alternatives to the private car unsuitable. Minibus services dedicated to the requirements of these particular groups may offer a more attractive alternative (e.g. the current PlusBus service in Camden and Islington).

We would like to know what you think

- Q44** Should we try to make walking more attractive by requiring investment in local streets and public spaces as a part of new developments?
- Q45** Should we promote widening pavements and reducing road widths to make walking more convenient? Should wider pavements only be sought where this can be done without loss of parking?
- Q46** Should we seek to establish secure public cycle parking in shopping and business areas?
- Q47** Should we devote more parking space in developments to ‘green’ vehicles (such as electric cars and cycles) instead of conventional cars?
- Q48** Should we promote the use of less-conventional forms of public transport, such as accessible minibuses for journeys to school and people with mobility difficulties?

Issue 3g – Movement of goods

Nationally, freight movements take place overwhelmingly by road. For Great Britain in 2004, 83% of freight lifted was moved by road, compared with only 4.6% by rail (*Transport Statistics for Great Britain*; Department for Transport; 2006). Comparable figures are not available for London, but 137 million tonnes of freight were delivered or collected by road in London in 2005, including 89 million with an origin or destination outside London (*London Travel Report* Transport for London 2006).

The movement of goods by road contributes to carbon emissions and harms air quality. The use of centralised distribution points and very large vehicles leads to long journeys, multiple drops, parts of journeys where vehicles are under-loaded, and a sequence of journeys-deliveries throughout the day. This makes it difficult to control delivery times – controls that could otherwise be used to avoid peak congestion, reduce delays to buses, and limit harm to residential amenity.

One way of reducing the impact of road freight may be to provide freight consolidation centres. These are points where loads are broken down and regrouped. This consolidation is used to maximise vehicle loads and allow smaller or more environmentally friendly vehicles to deliver and collect at scheduled times in congested areas. They may also be points where loads are shifted from rail to road.

In the past the Regent's Canal has performed an important commercial/transport function and there is scope to do so in the future. It connects to the larger canal network in London, being part of the Grand Union Canal, which stretches to Birmingham and beyond and connects to the River Thames at Limehouse. The waterway is currently under-utilised for transport and it is possible that potential for this could be lost completely if steps are not taken to ensure it can continue.

Issues facing the commercial and transportation viability of the Canal include the fact that over time, as these uses have reduced, the Canal has become valued for other reasons, for example as an open space and as a habitat for plants and animals, many of which are protected species. These other functions could be affected by use of the Canal for transport and commercial purposes. There will therefore be a need to find a balance between various Canal uses.

We would like to know what you think

- Q49** Should we seek to reduce heavy goods vehicle movements by promoting a freight consolidation centre, which provides for local collection and distribution by smaller vehicles, for example through requiring developer contributions?
- Q50** Q50 Should we seek to restrict the times at which deliveries can be made to new developments in the Central London Area, in shopping areas, or across the Borough?
- Q51** Should we prioritise uses along the canal-front that rely on a waterside location?
- Q52** Should we encourage the use of the Regents Canal for freight transport by enabling developments along its frontages that would support this, including commercial/light industrial developments?
- Q53** Should we prioritise some canal uses above others?
- Q54** Should we encourage developments to use the Regent's Canal for waste removal and for the delivery of materials and removal of construction waste?

Issue 3h – Public transport capacity

The use of public transport in London is increasing. The number of people using London buses grew more than 52% from 1995-6 to 2005-6 and journeys on London Underground grew by 24% from 1995-6 to 2005-6. Rail passenger journey also increased over this period (London Travel Report; Transport for London; 2006). The government has set targets for Transport for London to increase Underground capacity by almost 12% from 2002 to 2012 (Department for Transport Annual Report 2004).

With predicted increases in population and jobs within Camden over coming years public transport use in the borough is expected to rise, putting additional pressure on a network that operates at or above capacity in some places and at some times.

From November 2007, Transport for London will control a number of train services on local lines north of the river. Those crossing Camden are the North London Line, services from Gospel Oak to Barking, and from London Euston to Watford Junction via South Hampstead and Kilburn. The Mayor has a programme to invest £25 million in station improvements, replacing trains to accommodate more passengers and passengers with mobility difficulties, and increase service frequencies.

In addition, Transport for London and the Department for Transport are jointly promoting Crossrail, a rail link running east – west across London. This will include an underground section in Camden and stops at Tottenham Court Road and Farringdon. The formal authority needed to construct the link is currently being considered by Parliament.

We would like to know what you think

Q55 Should we seek contributions to rail and light-rail infrastructure or bus facilities from developments? Should any provision apply to all developments or only those over a certain size?

Issue 3i – Residents' parking

The availability of car parking can encourage travel by car, which can increase local congestion and reduce air quality in the borough. The number of parking permits currently issued to Camden residents exceeds the number of on-street spaces available in a number of parts of the Borough. The Council currently encourages people to live without access to a car by negotiating housing developments that have a restricted supply of car-parking (that is, with a limited or zero supply of resident spaces and permits) – these are called car-capped and car-free developments. Just over 900 of the 1,136 dwellings permitted in the borough in 2005/6 were subject to an agreement restricting car parking.

There are restrictions on car parking for non-residential developments at present, with no more than one parking space per 1000 sq m of new floor area permitted in most cases. However, the Council does not currently use agreements for car-free workplace developments. For developments subject to such an agreement, business permits would not be available.

People often respond to parking pressure by seeking to create car parking on front gardens and forecourts. Creating private parking in this way usually reduces the number of spaces on-street that are available to all local residents and may harm the appearance of the street. Paving over previously grassed areas with surfaces that do not allow water to pass into the soil increases the speed at which storm water fills up drains, which increases the likelihood of flash floods. See issue 2D – Water for more on run-off and flooding.

We would like to know what you think

- Q56** Should we extend the use of car-free agreements to cover all additional homes rather particularly seeking it in the most accessible parts of the borough?
- Q57** Should we extend the concept of car-free development to cover workplaces and other uses as well as homes?
- Q58** Should we introduce greater restrictions on the ability to use front gardens and forecourts for parking?

Issue 3j – Impact of development works on transport

The development process can be extremely disruptive to travel and transport infrastructure. Deliveries of cranes, prefabricated structures etc can disrupt traffic for long periods, while footpaths, bus lanes and parking places may be closed where work cannot be contained within the boundary of the site. The dense urban fabric in much of Camden and the increasing pace of development can worsen the impact of ongoing works. Redevelopment of sites where buildings remain on three sides can close narrow streets and a series of separate developments in the same area could close a street for an extended period. In addition, development works can damage streets through the impact of vehicles, equipment and materials on the pavement or roadway.

Developers can currently be required to submit construction management plans before implementation, but these cannot always overcome the problems that arise, for example as the method of construction may already be determined by the design of the scheme; and other schemes affecting the same street could emerge before the management plan has been prepared, or between approval and implementation of the scheme.

Some works to the street needed to accommodate a development, such as removing redundant accesses and widening pavements to an appropriate width, can be anticipated and monies set aside by the developer in advance to deal with them.

We would like to know what you think

- Q59** Should we require construction management plans to be submitted for small developments or only larger schemes?
- Q60** Should construction management plans be required to take account of the impact of other possible schemes in the area?
- Q61** Should we explore new ways of ensuring that streets are made good following development, such as requiring pavement and roadway renewal adjacent to developments as standard, or by requiring a bond? Should any provision apply to all schemes or only larger developments?

4. Improving and protecting Camden's environment

Camden has a unique and diverse character, containing a mix of contemporary and historic architecture, high and lower density developments and many areas of distinctive character and appearance. It also has a wide range of parks and open spaces. One of the themes of Camden Together, Camden's Community Strategy, is a sustainable Camden that adapts to a growing population, which aims to adapt to population increase while protecting, promoting and enhancing our environment for us and future generations.

The Core Strategy Issues and Options paper, which is being published for consultation alongside this document examines the key strategic and overarching issues relating to improving Camden's local environment, including:

- > promoting high quality, sustainable design,
- > improving and protecting our built environment and respecting local distinctiveness,
- > securing improvements to our streets and public spaces and
- > improving and protecting our parks, open spaces and wildlife.

This paper explores more detailed matters in relation to the issue of improving Camden's environment.

Key references/evidence

- Planning Policy Guidance 15 – Planning and the Historic Environment
- Camden Biodiversity Action Plan 2002
- An Open Space Strategy for Camden 2006-2011
- Planning Policy Statement 9 – Biodiversity and Geological Conservation; 2004
- Planning Policy Guidance 17 – Planning for Open Space, Sport and Recreation; ODPM; 2002
- Draft Further Alterations to the London Plan; Mayor of London; 2006
- Camden Open Spaces, Sport and Recreational Facilities Needs Assessment Report 2004

Issue 4a – Our historic environment

Camden has a rich and generally well-preserved architectural heritage, with nearly 5,000

listed properties and 515 listed structures (i.e. lamp posts, groups of bollards, etc). There are currently 53 buildings/structures in Camden on English Heritage's Buildings at Risk register. Camden also has many Historic London Squares, Parks and Gardens of Special Historic Interest and conservation areas and also 13 archaeological priority areas.

The historic environment in Camden is important in defining what gives different parts of the borough their distinctive characters. Buildings and places of heritage significance help to give a sense of place and allow people to understand our history whether it be through properties once occupied by noteworthy people or areas that once served a distinct purpose, such as the mercantile industrial buildings along the Regent's Canal, which was once a busy transport corridor and centre for industrial development.

Architecturally, many historic buildings add attractive elements to the urban landscape in Camden and stand out as local and London landmarks. For example, the Grade I listed St Pancras Chambers is an excellent example of the gothic revival style of architecture, forming a strong landmark which is testament to the area's significance both now, with the relocation of the Eurostar terminal, and in the past, as a monument to London's power and affluence during the Victorian period.

Government guidance states that there should be a general presumption in favour of retaining buildings that make a positive contribution to the character and appearance of a conservation area. However, in Camden there are also instances where buildings outside conservation areas have historic merit and contribute to an area's character and local distinctiveness. In some cases such buildings have been demolished, allowed to fall into disrepair or are no longer fit for their original purpose, despite being structurally sound. Reuse and adaptation would allow such buildings to be brought back into use and would help to achieve more sustainable development by reducing construction/demolition waste.

We would like to know what you think

- Q62** Should we maintain our current approach to protecting and enhancing the historic environment, that is to only grant permission for developments affecting conservation areas or listed buildings where they would preserve or enhance the special character or appearance of the area or building?
- Q63** Should we encourage the reuse of all historic buildings, regardless of whether they are listed or in a conservation area, or should we only do this where a building has been identified as being of value (for example in a conservation area statement)?
- Q64** Should we require archaeological assessments for all development proposals within Archaeological Priority Zones?
- Q65** Should we continue to seek physical preservation of archaeological features and their setting when a development is close to a site or monument of archaeological importance?

Issue 4b – Parks and open spaces

Camden contains nearly 300 designated parks and open spaces. The borough is also fortunate to have four areas of Metropolitan Open Land, which are given the same protection as the Green Belt. These include the eastern quarter of The Regent's Park and the majority of Hampstead Heath. There are also 47 Protected London Squares in Camden and 21 Parks and Gardens of Special Historic Interest. These and other informal green spaces provide breaks in Camden's urban environment, as well as being important habitats for wildlife, recreation opportunities and forming unique features of the borough's historic landscape. The contribution of private gardens to Camden's green landscape should also be noted.

There are six designated allotments in Camden. These add to the green space of their local areas and help biodiversity through providing habitats for certain species. Allotments allow people to grow their own food or source food more locally. Development pressure over recent years has led to the loss of allotment spaces despite demand far outstripping supply.

Despite there being many designated open spaces in Camden, there are parts of Camden that are deficient in high quality accessible public open space, for example, parts of Central London and the north west of the Borough. Open space is important to Camden residents with 47% saying that the range of open spaces in Camden is the best thing about living here. Therefore we need to seek to improve what we already have and try to reduce any deficiencies in parks and open space.

It is likely the importance of open spaces will increase due to the effects of climate change. Open space can act as cool refuges within the built up areas of the borough. With the hotter weather expected due to climate change demand for open space may increase, placing additional pressure on spaces, facilities and maintenance. Open space also plays an important role in storing and slowing the flow of water when it rains, reducing the likelihood of flooding.

There are also limited connections between Camden's open spaces (i.e. metropolitan walks and green corridors). Metropolitan Walks are walks through the built environment that enhance access to open spaces and improve pedestrian movement by creating a safer more pleasant environment. The adopted Unitary Development Plan (UDP) 2006 highlights four such walks through Camden: City Walk 1 (Belsize Walk); City Walk 2 (Hampstead Heath to Covent Garden, via Camden Town); the Regent's Canal Towpath; and the Jubilee Walk Way.

Green corridors are fairly continuous areas of open space, based on a natural habitat or waterway, which lead through the built environment. The adopted UDP 2006 designated a small network of these corridors and identifies missing links. The review of our planning strategy and policies gives us the opportunity to improve open space connections, as well as enhancing pedestrian routes and bridging gaps in green corridors.

Please see the Core Strategy Issues and Options paper, which is being made available for consultation alongside this document, for further consideration of providing, improving and protecting parks and open spaces.

We would like to know what you think – *continued*

- Q66** Should we continue to only grant permission for development on or adjacent to designated open space where the development is ancillary to the use of the space?
- Q67** Should we continue to only grant permission for development adjacent to designated open space where it would not harm the character, features, setting and biodiversity value of the space?
- Q68** Should we expect development to take opportunities to improve existing, and create new, links to Camden's green space network through the use of green landscaping and providing green links across and between sites to link up currently disjointed open spaces and green corridors?
- Q69** Should we include specific protection for different types of open space that reflects their special characteristics and values or should we have a general policy that relates to all types of open spaces?

Issue 4c – Sports and outdoor recreation facilities

Outdoor sport and recreation facilities in Camden include tennis courts in Hampstead and Waterlow Park and an athletics track and bowling greens at Parliament Hill. There are also football, cricket and rugby pitches in Regent's Park and the Hampstead Heath Extension, close to the borough boundary, which provide facilities used by Camden residents. However, the level of such facilities in Camden is low with only 3% of the total open space in Camden devoted to outdoor sport and recreation. *Camden Open Spaces, Sport and Recreational Facilities Audit and Needs Assessment 2004* identified a shortage of formal outdoor and recreational facilities within the borough, with limited opportunities for additional provision.

Despite this lack of sport and recreation facilities, Camden does have considerable amounts of open space for children's play. Whether equipped play areas or safe areas for informal play, most children and young people in Camden have access to playspace. It is important that in the future that we can continue to offer adequate playspace provision to Camden's children and young people.

Government guidance on planning for open space, sport and recreation aims to protect playing fields and outdoor recreational spaces and not to allow their development unless an assessment has been undertaken which has clearly shown that the open space or the recreational facilities are surplus to requirements. It states that planning obligations should be used where appropriate to seek increased provision of open spaces and local sports and recreational facilities and the enhancement of existing facilities.

The London Plan states that boroughs should identify sites for a range of sports facilities to meet local, sub-regional and wider needs. The Mayor's draft supplementary guidance *Providing for Children and Young People's Play and Informal Recreation* proposes introducing a benchmark of 10 sq m of play or informal recreation space per child and young person for new developments.

The provision of indoor leisure facilities is covered by Issue 4d of this paper under the theme of *Improving the quality of life of Camden's communities*.

We would like to know what you think

- Q70** Should we require developments that are likely to increase demand for play space to provide such facilities?
- Q71** Should we not allow any loss of playing fields or outdoor recreation space or should we allow loss only in exceptional circumstances? If the latter, what do you think should constitute exceptional circumstances?

Issue 4d – Biodiversity

The Camden Biodiversity Action Plan 2002 identified priority species present in the borough that are threatened by habitat loss and other factors including development. It showed that limited space exists to accommodate plants and animals in the borough and the importance of protecting and enhancing spaces/habitats/places that currently support biodiversity and particularly the five priority species (bat, hedgehog, house Sparrow, dragonflies/damselflies and the stag beetle).

There are currently five Sites of Nature Conservation Importance (SNCI) designated in Camden that are of Metropolitan importance, 15 of borough-wide significance and 17 of local significance. There are also several Sites of Special Scientific Interest (SSSI) in Camden, including Kenwood Ancient Woodland and Hampstead Heath Woods. There are also several publicly accessible local wildlife sites managed by the Council. These sites, along with other green spaces, including railway embankments, provide important habitats for priority species and other plants and animals and their future protection is essential to ensuring the continued existence of such species in the borough.

The Action Plan also identifies the importance of the Regent's Canal for its biodiversity value and highlights that a lack of appropriate management in the past has led to dominance by vigorous invasive species. Degradation has occurred as a result of heavy public use and loss of habitat through unsympathetic canal-side development. The Regent's Canal is a valuable biodiversity asset that is of Metropolitan Importance for Nature Conservation. Law protects many canal-side species, including bats and nesting birds.

We would like to know what you think

- Q72** Should we expect all developments to protect and enhance biodiversity, including creating wildlife habitats, or should this requirement only apply to new build developments (that is, not for extensions and alterations)?
- Q73** Should we encourage new developments to incorporate measures to protect existing and create new wildlife habitats, particularly for Camden's five priority species?
- Q74** Should new development along the Regent's Canal and adjacent to any site designated as a Site of Nature Conservation Importance, be expected to enhance biodiversity through incorporation of features into building design that would help enhance habitats?

Issue 4e: Air quality

Camden continues to fail to meet national air quality standards for nitrogen dioxide (NO₂) and particulate matter (PM₁₀), which are mainly caused by vehicular traffic with some contribution from industrial activities, domestic and commercial heating systems, and, in the case of particulates, some natural processes. Consequently, the whole of the borough has been declared an Air Quality Management Area. The Council has produced an Air Quality Action Plan that identifies actions and mitigating measures necessary to improve air quality in the borough.

Camden's Unitary Development Plan (UDP) 2006 requires developments which may have a significant impact on air quality to submit an air quality assessment and include any necessary mitigation measures. It also has policies to reduce vehicular traffic and encourage public transport, cycling and walking.

Many of the existing areas and sites highlighted for intensification of development in Camden are located around major transport nodes such as Tottenham Court Road, Kings Cross, Euston Road and Finchley Road. These transport nodes have some of the worst pollution levels in the borough due to vehicular traffic. Potential mitigation measures include the provision of air conditioning in nearby buildings that can filter the air. However, this option uses a significant amount of energy (see also Issue1B).

The increasing interest in the use of biomass as a renewable energy source in developments can conflict with local air quality management. When biomass is burnt gas and particles are released into the air further degrading air quality.

We would like to know what you think

- Q75** Should we continue with our current approach to improve air quality by restricting traffic within the borough?
- Q76** Should we be more specific about what scale and type of development should provide an air quality impact assessment?
- Q77** Should we require developments located in areas of particularly poor air quality to incorporate mitigation measures?
- Q78** Should we restrict the location of sensitive land uses such as residential development in areas with particularly poor air quality, or is it more important that development is provided, but with adequate mitigation measures?

Issue 4f – Trees

Trees are an important element of Camden’s environment, providing natural habitats and shelter, as well as improving the appearance of the borough and enhancing our quality of life. Numerous trees in Camden are protected, either through Tree Preservation Orders (TPOs) or due to their location within a conservation area. Camden’s approach to managing and maintaining Council-owned trees in the borough is set out in the Camden’s Tree Strategy.

Increased pressure from development and the intensification of the use of sites can result in the loss of trees. This can harm the appearance and character of the local area and cause a loss of habitat. Trees can also help reduce the predicted impacts of climate change. Areas with significant tree cover can act as water stores slowing down the passage of water, thereby reducing flash flooding and peak flows and lessening flooding and its severity. Tree cover can also create cool refuges for people and animals and this will become increasingly important with the anticipated hotter summers. Further, trees help absorb air pollutants, removing carbon dioxide from the air helping to improve air quality. Also, with envisaged climate changes, there will be an increasing need to plant species that can cope with a different climate so as to maintain adequate tree cover in the borough.

We would like to know what you think

- Q79** Should we protect trees in Camden in addition to any protection afforded them through TPOs and conservation area designation? If so, how can we achieve this?
- Q80** Should we encourage new developments to include trees as part of site landscaping?
- Q81** Should we encourage trees planted as part of new developments to be native species suited to their individual locations within Camden or should we also take into account predicted climate change in species selection?

Issue 4g – Views

Views of important landmarks and vistas across London from Camden’s parks add to the attractiveness of the borough and help us to understand the layout of our city. The Mayor Of London has designated a number of views across London from key vantage points to significant London landmarks. Five of these views originate in Camden, namely the views from Primrose Hill and Parliament Hill to both St Paul’s Cathedral and the Palace of Westminster and the view from Kenwood to St Paul’s. The background of views of St Paul’s from Greenwich and Blackheath Park also cover part of Camden.

Other, locally important views contribute to the interest and general character of Camden. These include views of listed buildings, landmark buildings and groups, and views into and out of conservation areas. Views to and from large public parks and London Squares help to give a sense of space and break up the borough’s urban form. Intermittent views of rear gardens and of their landscaping can also help break up the urban form and contribute to an area’s character.

The Unitary Development Plan (UDP) 2006 contains a policy on protecting of local views including criteria as to what constitutes an important local view. It does not specify particular views worthy of protection, nor any criteria as to what would constitute harm to these views. Different views have different elements that make them notable and therefore may require differing levels of protection to ensure appropriate protection without overly restricting new developments. Camden’s Conservation Area Statements identify important local views within, into and out of our conservation areas. Therefore, any harm to these views would be likely to cause harm to the conservation area.

We would like to know what you think

- Q82** Should we specify the requirements for protection of each element of the strategic viewing corridor (i.e. viewing corridor, background consultation area, etc)?
- Q83** Should we maintain our current approach to local views or should we specifically identify these views and set out how they will be protected, taking into account their individual characteristics?

Issue 4h – Shopfronts and advertising signs

Shopfronts help to define the character of our town centres and local shopping areas. If well-designed and maintained they can enhance the character of the local area, as well helping to create safe and attractive centres where people want to shop, work and live. Throughout Camden's town centres and shopping frontages there is a huge variety in the design, scale, quality and function of shopfronts. The colourful and unique shopfronts of Camden Town, for example, are part of what gives the area its vibrant character and strong sense of place. While the well-preserved historic shopfronts in Hampstead reflect its village heritage.

In these and other centres and shopping areas throughout Camden it will be important to ensure shopfronts are of a high quality, are well designed and preserve or add to the character of the area. Security grilles and roller shutters used to secure shopfronts outside opening hours can make a poor contribution to the streetscape, particularly where solid shutters are used. This can lead to reduced feelings of personal safety, particularly at night.

Attractive, well-placed advertising signage that responds well to the scale and character of its location can add to the character and distinctiveness of an area. It should be noted however, that much shopfront advertising does not require planning permission and is outside of the Council's control. Hoarding and banner advertisements do require permission and in some cases these can detract from the appearance of an area,. However, in some instances well-designed temporary advertising can provide a visually interesting way of concealing a construction site.

We would like to know what you think

- Q84** Should we require new developments affecting shopfronts, including changes of use, to enhance the appearance of the shopfront, with greater consideration of design issues in addition to signage, including security grilles and shutters?
- Q85** Should we allow banner advertisements and hoardings provided that they are temporary in nature?

Issue 4i – Basements

The development of basements is becoming increasingly common in Camden as a method of gaining additional space in homes without having to relocate to larger premises. Basements can also help to improve the energy efficiency of buildings, as they remain cool in hot conditions without the need for mechanical cooling systems. This will become increasingly important with the predicted temperature rises associated with climate change.

Small domestic basement development is most common in the north of the borough, where many properties have larger gardens that can accommodate some form of underground development. However, in these locations basements can impact on the infiltration of water and on biodiversity, particularly if they use a significant proportion of a property's garden space. Basement development can also damage or destroy the root system of trees if sufficient space is not retained for their growth.

Basements are often included in major developments in the Central London part of Camden. The environmental impact of basements in these locations is limited as there is no existing infiltration of water into soil due to impervious built surfaces and there is no remaining biodiversity.

Basement development can be at a higher risk of flooding, given its location below ground level and the potential for floodwaters to flow into them. No areas of Camden are currently identified by the Environment Agency as being flood prone, and this is unlikely to change given the River Thames flood defences. However, localised flooding could increase due to increased storms as a result of climate change and the establishment of more hard surfaces, which prevent water soaking into the soil and speed up the rate of water flow. Given this increased flood risk, there may be certain uses that would not necessarily be appropriate in basements in flood prone areas, such as essential generators or children's playspaces.

We would like to know what you think

- Q86** Should all basement developments be expected to incorporate green roofs or soft landscaping above?
- Q87** Should sufficient garden space be retained around a basement development in order to accommodate tree growth, biodiversity and water permeability?
- Q88** Should we influence what basements can be used for in areas prone to flooding and/or require adequate mitigation measures should certain uses (e.g. essential power generators or children's playspace) be proposed?

Issue 4j – Unstable and contaminated land

UNSTABLE LAND

Land instability can be caused by natural processes or human activity. Geological conditions such as steep slopes, made-up ground, landfills or excavations, and underground water flows can all create problems of land instability.

There is a known area of unstable land in the north west of the borough. However no geological study of Camden has been conducted. Areas of land instability may change in the future due to changes in soil conditions and underground water flows due to the hotter summer and wetter winters predicted as some of the effects of climate change. There is potential for the number of sites with unstable land to increase due to the drying and shrinking of sites on London Clay in the summer, but also due to increased rainfall in the winter.

As ground and hydrological conditions will be different at each location and that each development will have a different impact on the land, the Council's current approach is to require each development to carry out its own stability report. The Council only grants permission for development where there is geological instability where this instability can be overcome and that there will be no risk to adjoining land, property and amenity.

CONTAMINATED LAND AND HAZARDOUS USES

As all development within Camden occurs on previously used, "brownfield" land, there is potential for sites to be contaminated, with implications for health. Many areas of Camden have been used for industrial processes in the past which may have caused contamination. A further number of sites are affected by potential contamination due to their proximity to contaminated sites and the potential for contaminants to migrate from one site to another.

The importance of preventing future land contamination and protecting health from existing land contamination is growing due to the increasing pressure to build more homes in Camden and therefore develop brownfield land that was once in industrial use for more sensitive residential use. In addition contamination from potentially contaminating uses, such as petrol stations, is to be avoided so that land is not sterilised for alternative, more sensitive uses in the future.

Camden's Unitary Development Plan (UDP) 2006 only allows development on potentially contaminated land or for potential contaminated uses where assessment, mitigation and remediation is provided. The UDP also limits the siting of hazardous substances and land uses unless there will be no harm to the environment or to the health, safety and well-being of local residents, workers and visitors.

We would like to know what you think

- Q89** Do you support the approach to development on unstable land outlined above?
- Q90** Should we specifically expect a geological report for:
- a.** developments on very steep slopes;
 - b.** where ground is to be made up or filled;
 - c.** where the development involves an especially large or deep basement, or
 - d.** where there is an underground water flow or water channel above ground?
- Q91** Do you support the approaches to contaminated land and the location of hazardous substances and land uses outlined above?

5. Improving the quality of life of Camden's communities

The growth of Camden's population needs to be accompanied by the facilities to ensure a good quality of life for the borough's residents, together with the social infrastructure necessary to enable its communities to operate. We need to make sure that issues of equity and equality of access for all are also considered.

This section takes forward the issues that are set out in Section 5 of the Core Strategy Issues and Options paper and looks at how Camden's Development Policies can improve the quality of life of Camden's residents; for example, in terms of community facilities, community safety and health. The broader issues of equality of opportunity and ensuring fair access for everyone are considered in the Core Strategy Issues and Options Report.

Key references/evidence

- Camden Together – Camden's Sustainable Community Strategy 2007 – 2012
- Safer Camden Strategy 2005-2008
- London Plan Mayor of London; 2004
- Draft Further Alterations to the London Plan; Mayor of London; 2006
- Health Issues in Planning; Best Practice Guidance, Mayor of London, 2007
- Camden's Noise Strategy 2002

Issue 5a – Community facilities and services

Community facilities include:

- > educational establishments, such as schools, adult learning centres, colleges and university premises where there is no residential element
- > health facilities, such as health centres, doctors surgeries, dentists and hospitals where there is no permanent residential element
- > facilities such as community centres, places of worship, police stations, play centres, youth clubs, day centres for older people, libraries, meeting rooms and community learning centres.

There has been a change in the way community facilities are provided, for example, from the NHS which is moving away from institutional-based health services to community-based care using a larger number of smaller premises, or the commitment to provide the borough with new style Children's Centres as part of the Government's 'Every Child Matters' campaign. These changes create different site demands so it is important for us to know what land and premises are needed for these uses in the future. Camden's Unitary Development Plan (UDP) 2006 stresses that new facilities with a local catchments should be close to the community they will serve and larger facilities that attract more people (e.g. hospitals) should be easily accessible by public transport. Please see the Core Strategy Issues and Options paper for more on community facilities.

The Council recognises that patterns of community facility provision change over time to reflect changing needs and circumstances. Due to Camden's high land values, when a community use changes or is moved elsewhere, there is pressure for the premises it occupied to be redeveloped for more profitable uses. To ensure that we do not lose valuable community facilities in the future and to enable ongoing access to facilities by the community, we need to establish what level of protection we should provide for community facilities and how to ensure that adequate provision is made to meet changing needs.

The Council supports the running costs of a large number of the community facilities in Camden as well as providing the premises they operate in. For example, through its Capacity Building and Funding

Management Service, the Council provides approximately £6.7 million a year in grants to the voluntary and community sector. It is important that we consider running costs in addition to ensuring that there are adequate facilities. It may be possible to secure contributions through planning agreements towards running costs from developments that are likely to increase the use of community facilities. The Council will need to work closely with community services providers within Camden to ensure that we can provide the right facilities that have sufficient funding, in the right places.

We would like to know what you think

- Q92** Where should new community facilities be located? What types of facilities could be provided in residential areas?
- Q93** Should new developments provide community facilities if they increase the pressure on existing facilities?
- Q94** Should new developments that are likely to increase the use of local community facilities and services make a financial contribution towards their running costs?
- Q95** When the loss of a community facility is considered acceptable, should we expect it to be replaced by another use that benefits the community, such as affordable housing?

Issue 5b – Meeting the borough’s education needs

As the population of Camden increases, so will the number of pupils attending Camden’s schools. We expect there to be an overall increase in pupil numbers in the borough in both primary and secondary sectors in the medium to long term. In both sectors there is already pressure on school places in the north west and the south of the borough. For the primary sector, a new school is planned in the King’s Cross area funded from a section 106 agreement and the developing primary capital strategy will examine options for further expansion where needed. In the secondary sector, the Building Schools for the Future programme envisages the creation of an additional 1,200 places in the north west and south of the borough to meet the needs of population pressure and to provide additional places to provide greater access to places in Camden schools for borough residents. Any further development in housing will put additional pressure on schools and children’s centres. Expansion of provision is restricted by limited available sites for school expansion or establishment of new schools. New school place provision resulting from housing growth should wherever possible be in locations which are accessible and walkable for pupils (particularly in the case of primary school pupils). This requirement restricts the suitability of many potential locations for schools and further increases the importance of considering the need to protect all existing education facilities and requiring new provision in areas which are considered to be accessible. The Council is also developing its 14–19 strategy in response to the Government’s national plans for the vocational diplomas and the need to improve the opportunities for all Camden’s young people as part of its vision for a borough of opportunity.

There will also be an increase in the number of students attending University and other Higher Education institutions. Camden’s Community Strategy aims to raise the overall achievement in secondary education including the building of a new secondary school in connection with the Building Schools for the Future programme.

In Camden in 2005/06 educational facilities showed the largest net increase in floorspace of all community uses, with the presence of the University of London and other further education colleges being largely responsible for the high level of new education floorspace. However, this significant increase in new education floorspace does not necessarily indicate that more Camden residents are becoming more or better educated. In areas of deprivation, there are still high levels of people with poor educational attainment and involvement in the education system.

One of the challenges for the Council is to try and get people back into the education system. Often this is achieved through community-based initiatives, which use facilities such as community halls and community centres rather than schools or colleges. This means that these community facilities provide a valuable education resource where they can provide accommodation for local community-based adult education opportunities. This can help get people who may, for example, be long-term unemployed back into education. Without the adequate provision of these locally based community facilities, there would be a significant gap in local education provision, particularly in the more deprived areas of the borough. Loss of community facilities would also impair the Council's Children, Schools and Families Directorate from meeting its targets on this issue.

We would like to know what you think

- Q96** Should we protect all existing education uses from change of use unless they are no longer suitable or have no demand?
- Q97** Should we require new mixed use developments to contribute to local education provision through inclusion of space on-site which can be used for education purposes?
- Q98** How can we encourage the re-use of buildings and premises for education facilities?

Issue 5c – Health and health inequalities

Planning has a key role to play in creating and managing the places we live in and therefore has an influence on our health and our ability to maintain good health. Many planning decisions and policies have a potential impact on health e.g. by providing safe and convenient parks to allow physical activity and promote mental and physical well-being.

The projected growth in Camden's population and the associated growth in the numbers of dwellings and their distribution is a critical factor in planning for health infrastructure and services in Camden. The reorganisation of health care provision to provide an increased number of smaller, but more specific community facilities is also impacting on how we need to plan for health infrastructure. The forthcoming *Local Government and Public Involvement in Health Bill* includes a proposal that Primary Care Trusts and Local Authorities work more closely to prepare joint strategic assessments of health and social care needs. This will help us to plan more effectively for the health needs of Camden, although the Council already work in partnership with a range of organisations on this agenda, particularly Camden Primary Care Trust.

As well as meeting health infrastructure needs we also need to consider the impact of policies on the wider aspects of health, well-being and the causes of health inequalities. Camden is a mixed and complex borough with many inequalities, especially related to health. For example, the difference in life expectancy between different areas of Camden is stark and life expectancy for men in Camden is 75.5, compared to 76.6 years in England as a whole, amongst the lowest fifth of local authorities in the country (Office for National Statistics and London Health Observatory, 2005).

The NHS Healthy Urban Development Unit was set up in 2004 to help integrate the health sector with the planning sector and vice versa. The unit tries to ensure that health issues and health facilities are integrated into the planning of new developments across London. Camden currently uses a model that the unit developed to calculate the required health facilities needed by new housing developments.

There are other tools available for assessing the health impacts of developments and strategies. For example, health can be integrated into existing assessments such as sustainability appraisals or environmental impact assessments of development proposals. Alternatively, a separate Health Impact Assessment could be undertaken. This would involve using existing data and information to assess the impact of a scheme on wide range of factors relating to health and well-being.

We would like to know what you think

- Q99** Should we provide specific protection for local community-based health facilities?
- Q100** How should we assess the impacts on public health of planning policies and planning proposals? Should we use Health Impact Assessments or do you consider another method would be more appropriate?

Issue 5d – Provision of leisure facilities

Leisure facilities (such as indoor sports facilities, gyms, cinemas, bingo halls and swimming pools) can help to improve people's health and well-being whilst also helping to strengthen community cohesion and reduce crime. It is therefore important that we plan for the leisure needs of the existing and future population and look for opportunities to link leisure facilities with other community facilities. Outdoor recreation and sports facilities are addressed under Issue 3J of this Report, under the theme of *Improving Camden's environment*, as they form part of the green landscape of the borough.

There is strong competition for land in Camden which often places leisure facilities under pressure from more profitable land uses. The construction of new space for leisure use increased in the borough in 2005/06 with 8,627 sq m of floorspace completed. However, this was offset by losses of leisure floorspace, which led to an overall net loss of 5,617 sq m. Camden's growing population will generate demand and need for new leisure facilities. Camden's current policy protects leisure facilities and aims to prevent further loss of facilities.

The Unitary Development Plan (UDP) 2006 guides new leisure development to the King's Cross Opportunity Area, Central London and town centres (excluding Hampstead). These areas are more easily reached by public transport and are more accessible to potential users. Refer to the questions below and tell us if you support the existing approach.

We would like to know what you think

- Q101** What new leisure facilities do you think Camden needs? Where should they be located? Should they be concentrated in town centres or other areas with high levels of accessibility?
- Q102** Should we allow leisure facilities to be replaced with other uses if these uses would benefit the community over and above the loss of the leisure use?

Issue 5e – Community safety

A safe Camden that is a vibrant part of our world city is one of Camden's Community Strategy's four key themes. This reflects the fact that crime and the fear of crime are major concerns for Camden residents. A 2004 survey of residents showed that 51% of those surveyed consider that crime and lack of safety are the worst things about Camden whilst 12% felt unsafe during the day and 49% at night (Camden Crime and Disorder Audit 2004). The previous audit, conducted in 2001, identified three crime hotspots: Camden Town, Kings Cross and Bloomsbury. Although there is still a greater than average rate of offending in King's Cross and Bloomsbury, this has lessened during the period of the current Crime Reduction Strategy 2002- 2005. However, Camden Town remains a 'problem' area, with the evening economy a particular issue. Please refer to the Core Strategy Issues and Options paper for more on the issue of making Camden a safer place.

Planning can play a role in community safety, for example, the detailed design and layout of new developments can ensure a natural process of surveillance over public and private space that reduces both the fear of and the actual incidence of crime. We do not currently have a specific planning policy on community safety; rather, designing out crime is considered alongside general design considerations. The Camden Primary Care Trust identify that the same social environmental factors that predict geographical variation in crime rates may also be relevant in explaining community variations in health and well-being. Please refer to Issue 4C for more on health inequalities.

We would like to know what you think

Q103 Do you support the existing approach that considers crime alongside other design factors? Or should we include a separate planning policy on how design of buildings and the spaces around them can improve community safety and reduce crime and opportunities for crime?

Issue 5f – Noise and light pollution

Camden's high density and mixed-use nature can result in disturbance from noise, vibration and light. The presence of major roads and railway lines add to the noise and vibration levels in the borough.

Camden has developed a noise strategy that covers impacts of noise from commercial activities, construction, traffic and railways amongst others, although no specific targets for noise impact reduction are included. Camden's Unitary Development Plan (UDP) 2006 contains policies on noise and vibration, which limit the creation of noise and vibration from plant, machinery and demolition and cover the impact of noise and vibration.

Government Planning Policy Guidance (PPG) 24 sets out the national planning requirements and standards for occupier's exposure to noise. The noise and vibration requirements within Camden's UDP go beyond those in PPG 24 in that the UDP includes a noise requirement for the evening. However, Camden's current approach does not refer to noise creep.

Camden's current noise and vibration standards also reflect the fact that people generally find that impacts from road traffic are worse than those from rail traffic. However, policies do not clearly link the issues of road traffic and noise disturbance.

Excessive or poorly directed light has only recently become a nuisance that the Council could act upon. Camden's UDP 2006 has a strong policy on light and the prevention of nuisance.

We would like to know what you think

- Q104** Do you support the Council's current approach to noise and vibration outlined above?
- Q105** Should we strengthen the standards on noise with regards to noise creep; noise (dB) levels; and/or frequencies?
- Q106** Should our approach to light pollution include measures on design and/or the strength of the lighting?

6. Securing a strong economy that includes everybody

ECONOMIC ACTIVITIES AND EMPLOYMENT

In line with Camden's Community Strategy vision to 'create a borough of opportunity' and to achieve 'a strong Camden economy that includes everyone' we want local residents to benefit from Camden's economic success. The Core Strategy Issues and Options paper looks at how we can increase job opportunities in Camden and the amount of pressure on business premises to be converted to other uses. This section further considers these issues and covers what type of employment premises we should promote and protect in Camden. The Core Strategy paper also addresses the issues and options associated with the Central London part of Camden and the pressures on employment land from other uses.

In 2005 Camden had 256,000 jobs in 23,100 businesses and services (*Annual Business Inquiry 2005*), third in London after Westminster and the City of London. Economic activity in Camden is largely tied in with the overall London economy. However, Camden has its own distinct economic characteristics that need to be considered. For example, the concentration of higher education institutions in Bloomsbury, the legal and business service sector in Holborn, a tourism and business location of national significance at Covent Garden and the retail, media and leisure business in the Tottenham Court Road, Fitzrovia and Camden Town. Camden is also the home to a large number of businesses that employ fewer than 10 people, and is seen by many as an attractive area to start a business. This sector has enormous employment potential and is responsible for much of the vitality and success of the commercial areas in the borough.

During consultation on Camden's Community Strategy consultation people told us that they valued the diversity of local business – particularly local, independent shops – and wanted this diversity to be preserved. Some stressed that the aim of a strong local economy needs to take account of social and local needs, not just financial ones, as people saw the issues not only about business and wealth. Encouraging and supporting alternative working practices, such as working from home, as a way of developing flexibility was also highlighted.

Key references/evidence

- Planning Policy Statement 1: Delivering Sustainable Development; ODPM; 2005
- Planning Policy Guidance 4: Industrial and Commercial Development and Small Firms
- Planning Policy Statement 6: Planning for Town Centres; ODPM; 2005
- Good Practice Guide on Planning for Tourism; DCLG; 2006
- Industrial and Warehousing Land Demand in London Report 2004
- Mapping and Analysis of Neighbourhood Deprivation in Camden 2005
- Camden Labour Market and Economic Profile 2006
- Camden Annual Monitoring Report 2005/06
- Camden's Annual Business Inquiry 1998-2005
- Camden's Employment Land Review 2004
- Camden's Retail Survey 2004

Issue 6a – Flexible and affordable employment premises

Office based uses form the bulk of businesses and employment floorspace in Camden. In order to balance this with other employment uses and ensure the long-term sustainability of the borough's economy, the Council wants to encourage the development of a broad economic base. The Unitary Development Plan (UDP) 2006 does this by seeking to protect and enhance a range of employment uses, though it may be necessary to strengthen this position to encourage investment in Camden's employment premises. There is also a need for different kinds of floorspace to cater for other start-up and small businesses in Camden (e.g. artist studios, light industrial space).

We would like to know what you think

- Q107** Should we require developments in appropriate locations to provide flexible and affordable workspace that accommodates a range of business uses other than offices, such as artist studios and light industrial spaces?
- Q108** Should we specifically encourage the provision of premises suitable for small businesses and start-ups?
- Q109** Are there locations that are particularly suitable for these types of premises where they should be encouraged?
- Q110** Are there other ways that we can secure support for small businesses?

Issue 6b – Areas with unique employment characteristics

There are parts of Camden that possess very specific employment characteristics, which need to be approached differently to other areas of the Borough. For example, Hatton Garden, which has a focus of jewellery making uses, and the Kentish Town Area, which includes a concentration of small light industrial premises in railway arches and converted mews areas.

These areas, particularly those with a light industrial character, are under greater threat from competing high value land uses, especially housing, owing to their locations. In order to ensure the continued supply of a range of employment opportunities and business premises, it would be important that these areas are supported by suitable planning policies.

Hatton Garden is a unique area where there is a strong concentration of jewellery related businesses. The London region accounts for 25% of the UK precious jewellery manufacturing and jewellery making provides 900 employee jobs in Camden (*Annual Business Inquiry 2005*, ONS). Hatton Garden alone has over 400 jewellery and allied trades businesses located in an area that covers only 28 acres. If you include the adjacent areas the number of jewellery businesses goes up to 650 jewellery firms including 100 designer-makers, representing 35% of the UK total industry (*Jewellery Sector Investment Plan 2005*). This area is under potentially greater threat from change to other uses given its prominent central London location, where land values are higher and there is increased residential development activity.

Camden's Unitary Development Plan (UDP) 2006 resists the loss of business uses on a site where there is potential for that use to continue. The UDP makes an exception in the Hatton Garden area by allowing the loss of offices to provide mixed use developments that include residential and light industrial premises that can be used as jewellery workshops.

Some parts of Camden have specialist retail characters which merit specific protection. This issue is addressed in the Core Strategy Issues and Options paper.

We would like to know what you think

- Q111** Are there any other areas in Camden that have a unique employment characteristics that require a specific approach?
- Q112** Should we continue to strengthen and protect these specialist employment areas and uses?
- Q113** Do you support the existing approach of providing jewellery workshops in the Hatton Garden area?

Issue 6c – Small and medium sized employment sites and premises

A research report called *Business Creation and Closures in Camden* from April 2005 found that the most commonly cited location factors for starting up a business in Camden are the availability and reasonable cost of premises, yet this is also a major determining factor for firms that are considering closing or moving out of the area. This suggests a pressing need to provide additional, suitable local workspace and to help small and medium-sized enterprises find appropriate locations.

The majority (75%) of businesses in Camden employ less than five people so we need to ensure that there is enough choice and variety of premises for these to continue and also to provide affordable opportunities for new small business to establish in the borough. Trends show that small and medium sized employment sites and premises face pressure to be converted to other, more profitable uses. Camden's Unitary Development Plan (UDP) 2006 tries to protect accommodation suitable for small firms.

The issue of the loss of small business space differs from the threat facing larger employment sites, as the loss tends to be incremental and therefore not as noticeable at a borough level. However, at a local level this loss can be felt by local businesses looking to start up in Camden or those wishing to move/expand their operations. It can result in businesses being forced out of the borough and a need for local people to travel further to work. It is therefore important that premises for these businesses and their expansion within the borough is accommodated and afforded specific protection.

We would like to know what you think

- Q114** Should we continue to protect all accommodation suitable for small businesses or should we allow for the loss of small business accommodation where it can be proven that premises are no longer suitable for this use?
- Q115** Should we actively encourage creation of additional small business floor space by requiring provision within large employment or mixed developments?

Issue 6d – Supporting new ways of working

As technology improves and people's habits change, new ways of working are constantly evolving with more people working from home or combining living and working spaces. In Camden, 10.7% of the working population work mainly or solely from home (2001 Census), although this category can cover a wide range of disparate activities. Also as the economy changes, new industries are emerging such as creative and environmental businesses. These new ways of working often have different requirements in terms of location, premises and travel demands, and in many cases are more flexible.

Flexible working can mean that journeys to work are reduced, which can in turn ease peak time congestion on roads and public transport networks. This can help to reduce air pollution, thereby improving local air quality and helping to combat climate change. Working from home can also increase economic activity in the borough and many small businesses begin in this way.

Combined live/work premises can contribute to the range of business premises available and support new ways of working. However, difficulties can arise with such premises in ensuring that the 'work' element is not converted solely to housing which would result in losing the workspace.

We would like to know what you think

Q116 Should we continue to permit live/work units provided they meet criteria relating to protection of the residential use of the site, local environment and traffic?

Q117 Should we encourage the establishment and expansion of creative and environmental businesses in the borough over other businesses, including creative industry clusters? How best should we do this?

Issue 6e – Tourism and cultural development

Camden is home to many nationally and internationally recognised tourist attractions and cultural features. These include the British Museum, Camden Town and its markets, Hampstead Heath and the British Library, as well as parts of Covent Garden, the West End and Regent's Park. There are also more locally recognised and specialist attractions, such as Parliament Hill, with its sweeping views across London, the Freud Museum, Lauderdale House and Keats' House.

Camden has a considerable amount of accommodation for tourists, ranging from bed and breakfasts (B&Bs) and small independent hotels to large internationally renowned hotels, which cater not only for tourists visiting Camden, but those visiting London in general.

The opening of the Eurostar terminal at St Pancras will increase significantly the number of tourists arriving in the area, particularly in 2012 when London is hosting the Olympic Games, as well as placing increased demand on existing tourist facilities. The redevelopment of the King's Cross area will help accommodate this growth, but pressure is also likely to be felt in other parts of the borough.

Although tourism brings considerable economic gain to Camden, it can also adversely affect the areas in which tourist uses, such as accommodation and tourist attractions, are located. These impacts include increasing traffic congestion and noise, and placing increased pressure on services that support local residential communities.

Our current policy guides tourism uses to locations within the borough that are well served by public transport, unless the use would be likely to only generate a few visitors or have a local focus. In the future it will be important to ensure that Camden's tourist attractions are protected and enhanced, as well as taking care that increases in tourism in the borough does not have negative impacts on local communities.

We would like to know what you think

Q118 Should we only allow new or expanded tourist facilities where these would not result in harm to residential amenity or the loss of services for local residents?

Q119 Should we continue to focus new tourist facilities in locations with good public transport accessibility?

RETAIL AND TOWN CENTRES

Camden's town and neighbourhood centres offer a wide range of shopping, services and leisure and cultural activities for local people and those visiting the borough. Camden has six town centres – Camden Town, Finchley Road/Swiss Cottage, Kilburn High Road (the western side of which falls within the London Borough of Brent), Kentish Town, Hampstead and West Hampstead – each with its own character formed from its mix of shops, services and other uses, its size, the places from which its customers are drawn, and environmental factors such as the age and style of its buildings.

Some of the southern parts of Camden have a national, international or London-wide shopping role or serve a similar function to town centres, for example Tottenham Court Road/Charing Cross Road, which operates as an extension to the West End, and High Holborn. Camden also has many neighbourhood centres and smaller parades of shops, which provide for the day-to-day needs of people living, working or staying nearby. In addition, the redevelopment of the King's Cross area will include a significant amount of new shopping provision.

During consultation on Camden's Community Strategy residents told us that they valued local, independent businesses, especially shops and wanted diversity to be preserved. Among the actions for Camden and its partners identified in the Community Strategy are:

- > examining the impact of parking, planning and other local services on shops;
- > reviewing approaches to town centre management, including the Business Improvement District model; and
- > working to sustain local economic services such as post offices and cash points.

The government considers the promotion of healthy and vibrant town centres as an important element in building sustainable communities. Healthy town centres are considered to be those that are attractive to their users and businesses, that offer a wide range of goods and services, and that ensure that everyone can access shops and services while minimising the need for car travel. The government encourages shops to be located in places most accessible by different forms of transport and the diversification of uses in town centres so that they offer not only shopping but leisure, cultural and tourism activities, which appeal to a wide range of social and age groups.

The Core Strategy Issues and Options paper also addresses the issues of promoting town centres in Camden and helping our local shops, from a more strategic perspective.

Issue 6f – Mix of uses in town centres

Camden's shopping streets offer a mix of shops, financial and health services, restaurants, take-aways, bars, markets, entertainment venues and other uses. Their combination contributes to the vitality of Camden's centres and helps to give them their individual characters. Camden has sought to achieve a balanced mix of uses in centres through protecting their main shopping role without preventing the growth of other activities. In line with government policy, Camden encourages land uses which create a large demand for travel locate in accessible areas well served by public transport, such as town centres.

Some of the borough's shopping areas, particularly in Central London have a specialist role of London-wide importance. These include bookshops around Museum Street, jewellery in Hatton Garden and specialist clothes shops in Covent Garden. The review of our planning policies allows us to consider whether we should take a different approach in these areas. This matter is also addressed to some extent in Issue 5B.

Camden's Unitary Development Plan (UDP) 2006 policies resist the loss of shops in a centre if there would be a harmful effect on its character, function and success. As there is a limit to the amount of land in our centres we need to consider whether some uses should take priority and what is an appropriate balance of uses. The UDP regards the use of upper floors of buildings in town centres as important to the vitality and safety of centres and seeks to ensure that these upper storeys are fully utilised as housing or other suitable uses.

We would like to know what you think

- Q120** What mix of uses do you consider suitable in our centres? Which uses/services do you think are the most important in a centre? Should shop uses take precedence over other uses or is providing a wider mix of use and services important?
- Q121** Should we allow a wider variety of uses in some centres?
- Q122** Are there uses that you think should be particularly encouraged or discouraged in centres? Do the different characters of our centres mean that some uses are more or less suitable in certain locations?
- Q123** Should we provide stronger protection for shops in some centres or parts of centres?
- Q124** Should we specifically identify and protect areas with a specialist shopping character? Which places would be suitable?

Issue 6g – Managing the night-time economy and the impact of retail and food and drink uses

Camden's image as a dynamic and attractive place to be is in part due to the number and quality of restaurants, bars and entertainment venues in the borough. These play an important part in the night time economy of Camden and of London, socially, economically and in terms of job provision. Camden Town and Covent Garden have particular concentrations of bars, restaurants and entertainment venues.

However, night-time activity can also lead to problems such as anti-social behaviour, fear of crime, noise, congestion and disturbance and conflicts can arise as much night time activity occurs close to places where people live. In addition, large numbers of such uses can change the character of the area in which they are located and reduce its range of shops.

Camden's Unitary Development Plan (UDP) 2006 aims to ensure that new food, drink and licensed entertainment uses do not cause harm to their local area and its character, either individually or cumulatively. We have also produced a series of documents that give detailed guidance on how our planning policies for retail, food, drink and entertainment uses in particular areas. In addition, Camden's Licensing Policy sets out for residents and licensees the expectations that the Council and the Metropolitan Police have for those involved in licensed activities.

The London Plan 2004 seeks to direct night-time and evening economy uses to London's town centres, while the Mayor's Cultural Strategy suggests planning policies should, where appropriate, support evening and night-time entertainment activities in Central London. The Mayor has also published best practice guidance on managing the night time economy.

We would like to know what you think

- Q125** Should we encourage a range of activities in our town centres including food and drink uses or should we do more to limit new food, drink and entertainment premises in some places?
- Q126** Should these uses be concentrated in certain locations to reduce the area affected by their impact, or should they be spread out to reduce the level of impact in each place?
- Q127** Are there some places where we should encourage a greater proportion of restaurants, pubs and bars?

Issue 6h – Markets and street trading

Camden is well served by markets, from street markets such as Inverness Street, Leather Lane and Queens Crescent to the world famous Camden Town markets. There are eight council-run markets and 44 individual street trading sites throughout the borough, which sell a range of goods from fruit and vegetables to clothing. Markets add greatly to the variety, interest and vitality of shopping in the borough and some are major tourist attractions. Markets also provide an important source of local employment, often providing more flexible and casual opportunities in the labour market.

Government guidance recognises the role that markets can play in bringing vitality and viability to areas. In addition, the Mayor's Food Strategy points out that the social and ethnic composition of London make street and farmers' markets important in meeting dietary requirements of many people.

Alongside their benefits, markets can also cause congestion and physical obstruction and be associated with litter and crime. Therefore, it is important that markets are carefully managed through secure design, environmental and street improvements and initiatives such as improving areas for parking and servicing.

We would like to know what you think

- Q128** Should we introduce planning policies to retain and promote Camden's markets?
- Q129** Should we identify locations for new markets? If so, do you know of any suitable places?

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Published October 2007. Camden Development Policies. Local Development Framework.