

# 09

## Delivering an Inclusive Economy



# 09

## Chapter



# Growing a successful and inclusive economy

**9.1** Local Plan policies on the economy aim to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to, and share in, the borough's economic growth.

**9.2** Camden has concentrations of high performing growth sectors, a significant research base and is home to a variety of national institutions. Strengths include the numbers of businesses engaged in technology and science; clusters of medical and educational uses; legal services; consultancy; and a wide range of creative industries. The vibrant social mix and creative spirit make the borough an attractive environment in which to invest. Further, multiple public and private organisations have committed to work together to promote and grow the Knowledge Quarter centred on King's Cross and Euston, recognising it has become an internationally significant cluster of knowledge and research-based activity.

**9.3** In 2022, Camden had the third highest number of jobs of any local authority area in London, at 402,000, demonstrating the borough's importance to London's economy. The number of jobs in the borough is nearly double the number of residents and around two-thirds of workers commute from outside of Camden. The largest employment types were 'Professional, Scientific and Technical Activities', 'Information and Communication' and 'Human Health and Social Work Activities'. The density of jobs reflects the scale and mix of business, research and cultural activities within the Central Activities Zone and the importance placed by businesses and organisations on proximity.

**9.4** While the last decade has seen dramatic changes in how people shop and access services, the borough's centres and high streets are generally performing well with vacancy rates in 2022 having largely returned to pre-pandemic levels. The 2024 Council Retail Survey shows that nearly all centres in the borough have vacancy levels far lower than national averages. There is also a vibrant evening and night-time economy concentrated in the south of the borough and Camden Town.

**9.5** Although Camden has a vibrant and resilient economy, with incomes of resident employees being above London and national averages, challenges exist, and the Local Plan's policies seek to respond to these. These include:

- areas of relative disadvantage experiencing income and employment deprivation due to low pay, insecure work and unemployment. This disproportionately impacts younger residents, Black, Asian and Other Ethnic communities, and disabled people, who are under-represented in higher-skilled occupations;

- around a quarter of working people in the borough are experiencing poverty with the cost-of-living crisis having a disproportionate impact on low-income families;
- too many residents lack a financial stake in the economy or are unable to influence decisions despite the growth they see around them;
- demand for large corporate office space and growth sectors such as life sciences, with limited land availability can make it challenging for start-ups, smaller businesses and not-for-profit organisations to find workspace on fair and affordable terms;
- significant numbers of office and industrial buildings will struggle to meet tighter energy efficiency standards without timely intervention; and
- reflective of wider inequalities, some residents experience exclusion from the digital economy.

**9.6** Our planning policies seek to ensure a continuing supply of office, industrial and warehousing land and premises to deliver growth and innovation while securing beneficial social, economic and environmental outcomes. The Local Plan seeks to improve access to a greater supply of affordable workspace, recognising its role in developing a more resilient economy based upon a range of business sizes and types, including start-ups and emerging enterprises. Allocated sites suitable for additional workspace are identified in chapters 3, 4, 5 and 6 of the Plan.

**9.7** Camden is an attractive place for business investment for multiple reasons, including the borough's transport connections and quality of the public realm. The area Policies (S1, C1, W1 and N1) in chapters 3, 4, 5 and 6 of the Plan, and the Infrastructure Delivery Plan identify the main infrastructure commitments and plans in the borough, many of which will help to support the growth of businesses and social enterprises.

**9.8** To ensure that the borough retains a diverse and vibrant economic base, the Council has also brought forward Article 4 Directions in central London, town centres and employment clusters to ensure that the local economy and livelihoods are not harmed through inappropriate changes of use. The Article 4 Directions remove permitted development rights which allow changes of use to be carried out without a planning application or assessment against planning policies, and without providing contributions to affordable housing and necessary infrastructure. The Article 4 Directions also help to stem inflation in business rents from the loss of viable premises.

**9.9** Throughout this chapter, the terms 'employment use or space', 'business' and 'workspace' are used to refer to the following uses:

- commercial, business and service uses (Use Class E) - this includes retail, cafes, restaurants, offices, research and development (R&D), light industry, health centres and indoor gyms;
- general industrial uses (Use Class B2);
- storage and distribution (warehousing) (Use Class B8); and
- other unclassified uses of similar nature to those above, such as depots or building merchants (Sui Generis).

# Policy IE1

## Growing a Successful and Inclusive Economy

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- A.** To secure a strong, diverse, sustainable and inclusive economy in Camden, and maximise opportunities for the borough's residents, businesses and voluntary sector to contribute to and share in the success of Camden's economy, the Council will:
1. use its planning powers to support businesses and enterprises of all types and sizes for a variety of business activities, while prioritising the delivery of space for key growth sectors, research-based activities, start-ups, smaller businesses and social enterprises;
  2. maintain a stock of premises available on a range of terms and conditions for firms with differing resources, including provision of affordable workspace;
  3. expect larger schemes to provide a range of unit sizes to increase the supply of space available for smaller businesses and entrepreneurs;
  4. resist the loss of viable employment space, especially where this offers lower cost or flexible space suitable for use by smaller businesses;
  5. support residents seeking work to access jobs, skills, education and training opportunities; and local business start-ups, by maximising benefits from employment developments throughout the life of the scheme, (planning, construction, fit out and occupation);
  6. require the submission of employment and training strategies for major schemes, and for office/industrial refurbishment schemes involving over 3,000 sqm of floorspace (gross);
  7. ensure that new workspace is well laid out, functions well for its intended users and can adapt to changing working practices;
  8. expect landowners and developers to introduce temporary ('meanwhile uses') in appropriate circumstances;
  9. work with landowners and developers to bring forward comprehensive mixed-use regeneration proposals that provide for the intensification of under-utilised sites or land to deliver employment uses and other priority uses;
  10. seek the provision of premises and sites that meet the specialist requirements of sectors such as research-based activities, creative enterprises and the jewellery industry;
  11. seek to address barriers to work and support health and well-being, such as the provision of childcare facilities to support working families;
  12. expect developers to provide high-speed, reliable digital connectivity to support occupiers; and
  13. seek to secure a financial contribution towards local skills, training and employment initiatives on schemes where it has been demonstrated to the Council's satisfaction that the loss of employment floorspace or land is acceptable.

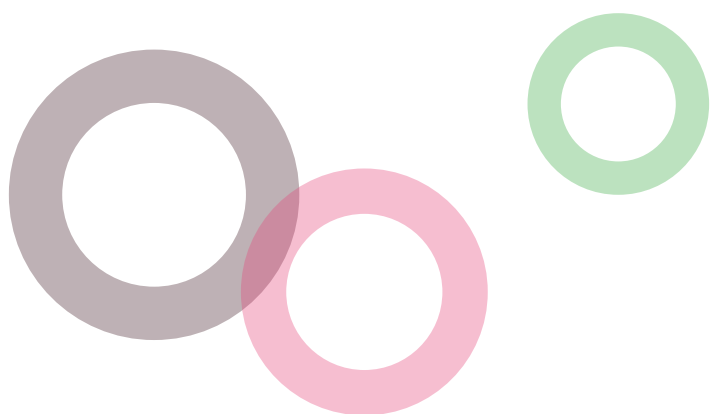
## The need for different workspace types and sizes

**9.10** Camden has generally been successful in securing new and refurbished workspace, including for new sectors and forms of business activity, for example digital media businesses and life sciences. This is reflected by the overall size of the local economy, the range of sectors and proportion of high growth businesses. However, the relatively high rents and overall costs of setting up and running businesses in the borough is a significant barrier for start-ups, residents wanting to run their own business and not-for-profit organisations. Furthermore, operating costs are expected to remain high.

**9.11** The introduction of permitted development rights, aimed at increasing the supply of housing, have resulted in losses of viable workspace in Camden, including studio and workshop spaces for which there is a strong demand from local enterprises and entrepreneurs. This unplanned approach to managing changes of use has disproportionately impacted some areas, such as Kentish Town, resulting in a diminishing supply of suitable premises and low vacancies.

**9.12** There is an insufficient supply of premises in Camden to support the growth of emerging sectors, a very limited supply of sites for specialist uses, such as purpose-built laboratories and research space, and difficulties finding accommodation to support makers, local supply chains and future retrofitting programmes. Common to most occupiers is the need for reasonable floor-to-ceiling heights, good access to daylight and sunlight and provision of on-site amenities including kitchens, showers, disabled toilets and breakout and meeting spaces. In most cases, flexibility is important to allow premises to adapt as business requirements change. The limited availability of land in Camden and competition from other land uses is expected to have a continuing impact on local property markets for the foreseeable future. Policy IE4 (Affordable Workspace) sets out the Plan's approach to increasing the supply of workspace below market rents, including in locations where less large scale development tends to come forward.

**9.13** Outside of the planning process, the Council is also actively supporting businesses and social enterprises through the use of its assets and by working with other landowners and increasing access to finance, for example by the establishment of a community wealth fund. Our policies aim to retain viable workspaces, including smaller, flexible spaces where supply is especially limited. We will seek flexible terms of occupancy where this is necessary to support smaller businesses. Where office premises are experiencing long-term vacancy and there is limited prospect of a viable economic use being found, conversion of these buildings provides a way of increasing the borough's housing supply in the most sustainable locations. Policy IE2 (Offices) explains how this process will be managed.



## Employment support, training and learning

**9.14** The planning system has an established role in obtaining developer contributions which can be invested in employment and training initiatives, secured through a planning obligation (Section 106 agreement). This is intended to support residents into good quality work which offers stability and security. These programmes include preparing young learners with the skills they require for when they start a career. The Council will therefore require employment and training strategies for all major applications and major refurbishment projects.

**9.15** Depending on the size of scheme, the Council will seek local employment opportunities during the design, construction/fitting out and subsequent occupation of a development, including the procurement of local goods and services.

**9.16** The Council's flagship scheme for helping residents into work, training and education and to start a business is known as 'Good Work Camden'. In addition, the STEAM (Science, Technology, Engineering, Arts and Maths) programme has been established to support young people to access opportunities into the knowledge economy through an innovative approach linking schools and employers. Camden's Inclusive Business Network has been established as a community of best practice to promote and share learning around good work standards, emphasising inclusive and accessible recruitment practices, access to flexible working arrangements and the progression and development of employees.

**9.17** We will expect developers and employers to support local efforts to provide better job security and more equitable outcomes for our residents. Camden Planning Guidance on employment sites and business premises provides more detail on our approach to training, skills and education, and developers will be expected to have due regard to this. This includes advice on where London Living Wage requirements apply, for example, for all Camden apprenticeships.

## Reducing resource consumption

**9.18** Concerns around the environmental impacts arising from demolition and rebuilding emphasise the importance of spaces being well-designed and capable of configuration for different activities and uses. One way of achieving this is through the use of flexible floorplates with careful consideration given to the location of fixed building components such as lifts, service risers, plant and bathrooms. More generally, all development should function well for its users in line with the Local Plan's design policies, with consideration given to making all buildings, especially those visited by members of the public, accessible wherever this is possible in line with Policy SC2 (Access for All).

**9.19** Businesses have an important role in tackling the climate crisis as funders and occupiers of development, through the sharing of knowledge, and by working in partnership with others. The Council will therefore expect proposals to embed low impact approaches to the design, operation and servicing of buildings in line with the Local Plan's climate change policies. Employer participation in local climate action will be strongly encouraged. We will prioritise the retention and extension of genuinely redundant offices where this can provide good quality housing in line with Policy IE2 (Offices) and CC2 (Retention of Existing Buildings).

## Meanwhile uses

**9.20** A key aim of the Plan is to make the best use of the borough's limited supply of land, including the opportunities presented by vacant or under-utilised sites. 'Meanwhile' or temporary uses have a role in bringing properties back into use, improving access to workspace, bringing people and businesses together in new and interesting ways or demonstrating how a centre or high street's offer might positively evolve. There are multiple examples in Camden of where meanwhile uses have been successfully planned and managed as part of longer, phased schemes, to realise benefits for the local community.

## Access to supporting facilities and services

**9.21** In centres, ‘pop up uses’ can allow the trialling of new formats showcasing the potential of a space or provide in-person events or experiences linked to brands and product launches. Meanwhile uses may also form part of a set of interventions (including those outside of planning) facilitating changes in a centre’s offer. Meanwhile uses should respond to local needs and priorities and can contribute to wider objectives of making centres more welcoming, inclusive and safe by providing free/low-cost spaces for recreation and well-being.

### Opportunities to provide new workspace and grow clusters

**9.22** The site allocations in the Local Plan identify the main opportunities to intensify existing employment sites to provide a better range of workspaces, including the re-provision of industrial uses. Adopted Neighbourhood Plans and Council-led planning frameworks provide further detail on how different land uses can be incorporated and benefits for the local community maximised. In addition to the delivery of the site allocations, much of the growth in employment floorspace in Camden is expected to arise from the refurbishment and redevelopment of premises in core office locations such as Holborn and Fitzrovia.

**9.23** Proposals incorporating employment floorspace should respond to the local economic context. This includes how a site relates to existing clusters of activity, including any other employment uses on-site. Some smaller enterprises and start-ups have a particular need for cost-effective space located within an established cluster. The competitiveness and productivity of research and development uses can rely on being part of an ‘ecosystem’ where there are opportunities to interface with related-uses, professionals and institutions.

**9.24** Where workspaces are being designed for a particular sector or type of occupier, dialogue with existing businesses and organisations operating in the cluster is likely to be necessary to ensure benefits for the cluster and of co-location are maximised.

**9.25** The Council will encourage developers to provide supporting facilities, especially where this is linked to barriers in being able to access good work, for example the inclusion of on-site childcare provision. In some cases, providing shared use (i.e. community access) to a business’s facilities may have significant benefit in addressing a local need. Access for start-ups and smaller businesses to on-site communal facilities can also reduce their capital costs upfront and help to provide a stimulating working environment for all occupants.

**9.26** Access to high quality broadband is essential for the majority of business types. Developers will be expected to ensure that connections are provided to all workspaces within the development site and delivered on a ‘plug-and-pay’ basis.

**9.27** Camden’s excellent transport connectivity, the quality of the public realm and access to local amenities, including leisure and entertainment uses, greatly contribute to the borough’s attractiveness as a place to work. Local Plan policies on open space, amenity and transport explain how the impacts of new employment and mixed-use schemes on the local area will need to be addressed. Furthermore, we will continue to seek investment in improvements to local infrastructure, for example improvements to local amenity space which can directly benefit workers, in line with Policy DM1 (Delivery and Monitoring).





## Offices

**9.28** Camden's office stock is large (c.3-5 million sqm of floorspace), varied in nature, and has an important role in supporting strategic functions in central London. For the most part it is occupied, especially high grade office space, and in good condition.

**9.29** Positively for office markets operating in Camden, the Camden Economic Needs Assessment (2023) identifies multiple sectors and activities where the office remains an essential part of business operations, including growth sectors such as data, IT and communications. Conventional office space is also required by a variety of creative industries. There is also a strong demand for hybrid spaces involving the provision of 'traditional' office and laboratory/research space within the same building. For some organisations, the benefits of clustering and proximity to related uses and activities rely on maintaining a physical presence while for those living in shared accommodation, access to workspace away from home can be an essential requirement.

**9.30** Throughout 2023-24, leasing activity in central London has increased, driven by demand for best-in-class offices amongst high growth professional services, including media and tech firms. However, it is recognised that there has been a permanent shift towards greater working from home, with employees in some sectors attending the workplace less frequently, and demand for poorly configured lower specification buildings has therefore fallen.

**9.31** Vacancy rates for poorer quality offices have not recovered to pre-pandemic levels; at the same time, there are supply constraints for new and fully refurbished offices and flexible spaces able to offer 'top-tier' Energy Performance Certificate/BREEAM ratings. As part of the UK's transition to net zero, there is an onus on landowners to upgrade (even relatively recently built) office buildings to progressively meet tighter energy efficiency requirements. While there is a growing market for these 'retrofit' projects, it is likely that some office buildings cannot be upgraded at a reasonable cost and therefore may struggle to find occupiers because of the priority tenants are now giving to the sustainability credentials of their workspace.

**9.32** Policy IE2 seeks to retain office floorspace where it can continue to meet an economic need. It also supports the retention and reuse of redundant office buildings for housing, including student accommodation. The conversion of large office buildings may in some cases provide an opportunity to improve local access to smaller, flexible accommodation for start-ups and small and medium enterprises (SMEs), particularly affordable workspace, in locations where there is a shortage of such space.



# Policy IE2

## Offices

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- A.** The Council will manage and protect the stock of offices in the borough to ensure that suitable and viable accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of hybrid space bringing together office floorspace and research and development uses.
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- B.** When considering proposals for the provision of additional office floorspace the Council will:
1. support proposals involving additional office floorspace and the refurbishment of existing office stock within parts of the Central Activities Zone where there is an established commercial or mixed-use character, and in cases where employment has been specified as an appropriate use in Site Allocation policies, the Euston Area Plan, or another development plan document. In total, it is anticipated that around 400,000sqm of floorspace will be provided for office and research and development uses over the Plan period;
  2. support office provision in other centres where this is of a scale commensurate with the size and function of the centre and in line with the Local Plan's area policies (Policies S1, C1, W1 and N1); and
  3. expect active uses to be provided at ground floor level where office and mixed-use schemes are located within an established retail frontage.
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- C.** The loss of offices in the borough will only be considered acceptable where a comprehensive and sustained marketing campaign has been undertaken for at least 12 months, which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the feasibility and viability of the following:
1. refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers;
  2. discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements; and
  3. reconfiguring the premises to meet the demands of growth sectors and smaller businesses, including studios, start-ups and micro businesses.
- Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.
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- D.** Where the Council is satisfied that a continuing office use of the building is no longer feasible, our preferred alternative use is housing. In cases involving the loss of over 4,000sqm (GIA) of office floorspace, we will seek the retention of a proportion of floorspace as affordable workspace. This will normally be secured at ground floor level.
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**9.33** The Council's Economic Needs Assessment has used a demand-based approach, considering labour growth, to project the total quantum of office floorspace likely to be required over the Plan period (406,359 sqm). This figure has been adjusted to take account of hybrid working practices and is considered achievable given delivery in recent years and the potential supply of sites. Within the quantum of floorspace projected, around 210,000 sqm is expected to be delivered from major schemes which already have planning permission. The vast majority of this is under construction so there is a high certainty of implementation during the first five years of the Plan period.

**9.34** The Council will continue to steer office provision towards the Central Activities Zone and other centres commensurate with their size and function. This will contribute to the vitality of centres and enable the further development of existing clusters of firms. A significant component of this supply will be from the site allocations set out within the Local Plan. Towards the end of the Plan period, development at Euston is expected to deliver significant amounts of employment floorspace, which has the potential to facilitate further growth of the Knowledge Quarter.

**9.35** On top of this planned provision, it is reasonable to assume a continuing supply of 'windfall' schemes (that is, additional premises or sites becoming available for development beyond those already identified) to meet changing tenant requirements and the development of clusters. While refurbishment schemes may not always deliver significant additional floorspace, they can be important in enabling occupiers to meet changing business needs.

## Requirements relating to the loss of office space

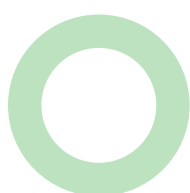
**9.36** The Council has an established process for dealing with situations where offices become obsolete. In such cases, we will expect the provision of marketing evidence to show that there is no potential interest from occupiers and that marketing has been undertaken based on a realistic rent (guided by average local market values for similar space). As a minimum, the marketing should be conducted over a 12-month period and by at least two agents with knowledge of local property markets. Robust evidence should be submitted in line with the detailed approach set out in Camden Planning Guidance on Employment Sites and Business Premises, including verification of the online marketing undertaken. The Council will also expect applicants to retain full records of any expressions of interest and viewings and inspections undertaken. We will expect this to be thoroughly addressed within the submitted marketing report.

**9.37** As stated, significant elements of the office market continue to perform well in Camden and far greater emphasis is being placed on workspace quality and building performance. It is important to guard against the wholesale loss of office floorspace where these issues are capable of being addressed to maintain jobs and facilitate future economic growth. Some neighbourhood plans and the London Plan seek to protect small office capacity in centres. Developers may therefore be asked to provide viability evidence to show that the refurbishment of a building to enable its continuing office use is not possible. This is particularly the case where premises appear to require relatively small-scale interventions such as improved accessibility or renewed fittings (lighting, cabling for broadband etc.).

**9.38** Legislation on building energy performance seeks to make the letting of commercial floorspace contingent on the achievement of certain target ratings (through the issue of Energy Performance Certificates). At the time of writing, this excludes all listed buildings and exemptions are allowed where the costs of upgrading buildings cannot be recovered over a certain timeframe. In practice, this reduces the likelihood of assets suddenly becoming stranded. Where there are exceptional challenges to improving the energy efficiency performance of purpose-built offices (for example, due to the construction method or a building's configuration), the Council will consider waiving the marketing exercise. In doing so, we will have regard to any evidence prepared by engineers or cost consultants with the necessary expertise.

**9.39** Where office buildings become redundant, the Council's preferred alternative use is housing. We will also support the conversion of offices to student accommodation. The ability to deliver residential accommodation will depend on matters including the size of site and depth of floorplates. Housing provided within former offices should comply with other Local Plan policies seeking a range of dwelling sizes and deliver an acceptable standard of amenity for occupants. In schemes involving the loss of significant amounts of office floorspace (in excess of 4,000 sqm), the Council may seek the re-provision of affordable workspace at ground floor level, subject to the impacts on scheme viability and local need.

**9.40** In line with Policy IE1 (Growing a Sustainable and Inclusive Economy), where employment floorspace is lost we will also expect a financial contribution towards local skills, training, and employment initiatives to be provided.





## Camden's industrial land supply

**9.41** Camden has a small but important stock of industrial land (just under 35 hectares).

This supports general and light industrial premises as well as other uses such as logistics, utilities and waste management.

**9.42** A sizeable proportion of this industrial land is located on, or near to, former railway yards and sidings and was redeveloped over the last decades of the 20th Century to provide light industrial sheds and storage and distribution facilities. This is often arranged at low densities and includes extensive areas of parking and yard space. The Local Plan's site allocations not only acknowledge the opportunity to intensify employment uses at these locations but also the role this land has in helping the borough to meet its housing targets.

**9.43** About a quarter of the borough's industrial land supply is designated as an Industry Area on the Local Plan Policies Map. This is equivalent to the Locally Significant Industrial Sites (LSIS) designation used in the London Plan to describe sites with importance for industrial and related functions. Industrial uses will therefore continue to have an important role in this location. The Council's Economic Needs Assessment notes that the majority of industrial land in the borough is non-designated and identifies 17 'clusters' of non-designated sites. Many of these sites are small, and some clusters have lost industrial capacity over the last decade, including from 'permitted development', restricting the Council's ability to assess proposals against our planning policies, including consideration of potential economic impacts.

**9.44** Around half of Camden's industrial land supply (about 18 hectares) is occupied by distribution/logistics depots. These have traditionally tended to be land-hungry uses with extensive areas of vehicle parking. The Local Plan's transport policies support a shift towards more sustainable, 'last mile' delivery operations based on consolidation and use of smaller, lower impact vehicles, including cargo bikes. There is likely to be scope to reduce the footprint of distribution/logistics uses and find alternative and complementary uses on some sites, subject to the needs of the Central Activities Zone continuing to be met.

**9.45** Within Camden's industrial land there is one waste management site, and one aggregates site, which are protected through other development plan policies and designated on the planning policies map. Furthermore, Local Plan Policy S3 seeks to protect the jewellery-related uses in the Hatton Garden area in the south of the borough as a nationally important centre for jewellery manufacturing and trading.

# Policy IE3

## Industry

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- A.** The Council will manage and protect the supply of industrial and warehousing land in the borough, recognising its value for a variety of business types, and the opportunity for some sites to be used more efficiently to deliver economic and wider Local Plan objectives.
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- B.** We will resist the loss of industrial and warehousing land, particularly where it has an important local economic role, or provides essential functions or services for the Central Activities Zone, unless it can be demonstrated to the Council's satisfaction that:
1. the site is no longer able to support a similar or alternative industrial use; and
  2. a marketing exercise has been undertaken which demonstrates there is no demand for an industrial-related use; and
  3. the applicant has explored options for the refurbishment and modernisation of existing premises. The Council will expect viability evidence to be submitted, to demonstrate that it is not possible for the building to be refurbished.
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- C.** The site allocations in the Local Plan identify opportunities to intensify large industrial and warehousing sites in the borough. To fully realise the potential of such developments, applicants must have regard to:
1. the need for these sites to be master planned and developed on a comprehensive basis with priority given to intensifying employment uses;
  2. the delivery of significant numbers of jobs for growth sectors, small and medium enterprises, start-ups and businesses supporting the Central Activities Zone and local supply chains;
  3. re-provision of a range of premises that takes into account the varied operational requirements of industrial businesses;
  4. prioritising the retention of existing businesses as far as possible. The Council may request the applicant to provide a business relocation strategy where it is not feasible to re-provide accommodation for businesses on-site;
  5. incorporating premises at a range of rents, including affordable workspace, and a package of employment and training contributions appropriate to the scale of the development;
  6. ensuring the successful co-location of uses through innovative design approaches and avoiding non-employment uses compromising the operation of businesses in line with the Agent of Change principle; and
  7. the need to complete the employment element of mixed-use schemes at an early stage in the construction programme.
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**9.46** The Council seeks to maintain a diverse stock of industrial premises suitable for a range of different users and activities. There have been few recent additions to the supply of industrial premises in Camden and vacancy rates are close to zero. A significant number of premises are occupied by uses important for the local economy, including creative and cultural enterprises, with clusters of firms benefitting from the sharing of knowledge, equipment and yard space. Many of these workspaces are in older industrial buildings, and at relatively affordable rents, making them particularly important for supporting local entrepreneurs and start-ups. Part of Camden lies within the 'Central Services Area', as identified in the London Plan, within which are business premises providing essential services for the Central Activities Zone such as sustainable last mile distribution / logistics and 'just in time' servicing. There is limited ability to provide additional capacity for these uses except where this forms part of major schemes involving the intensification and modernisation of sites.

**9.47** The Camden Economic Needs Assessment (ENA) identifies the function and role of existing clusters of industrial and warehousing sites, although there are also some smaller sites outside of these clusters which provide suitable accommodation for small enterprises. The ENA also notes the potential role of industrial land in enabling new and emerging activity over the Plan period, such as building retrofit programmes and circular economy uses (such as the reuse or 'upcycling' of materials), and in supporting more local supply chains (reducing the need to transport goods over long distances).

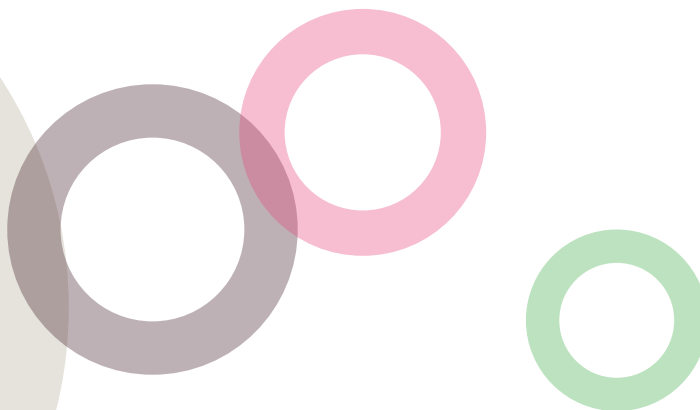
**9.48** Given the constrained supply of existing industrial land in the borough; the limited ability to add significantly to this; the potential for sites in industrial use to continue to serve a beneficial economic function; or help facilitate new/emerging activities, reliant on being able to find suitable industrial land, the ENA supports the protection of remaining non-designated industrial land.

**9.49** It is therefore assumed that other than the sites allocated for intensification or development in the Local Plan, the vast majority of the remaining stock of non-allocated industrial sites serve a valuable economic function and therefore, will continue to have an important role in contributing to local economic need. Given this, other land uses (including offices) will generally be resisted on these sites except where thorough evidence has been presented to show that the potential for the site to remain in industrial use is low. Applicants will therefore be expected to provide marketing evidence in line with the approach for offices set out for offices in Part C of Policy IE2 and demonstrate through viability evidence why there is no realistic option for retaining an industrial use, including, where relevant, through the upgrading and refurbishment of premises. Any viability assessment should be prepared with input from agents with specialist knowledge of industrial land markets.

## Comprehensive development of industrial sites

**9.50** The site allocations in this Plan include underutilised sites the Council considers provide opportunities to intensify employment use as part of a comprehensive planned approach to development while delivering other Local Plan priorities, particularly permanent self-contained housing. Detailed policy requirements for each site are set out in the site allocation policies. To ensure the effective regeneration of key sites, the Council has been convening discussions with landowners as part of a comprehensive planned approach that considers the most effective approach of bringing different land uses together. One of the site allocations, Murphy's Yard, forms part of the designated Industry Area and therefore proposals will be expected to intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity, and provide for other high density employment uses in line with Policy C3 (Murphy Site).

**9.51** Policy IE3 recognises the need for a range of premises to be provided at a variety of rents, reflecting the different ways industrial premises are used. The Council will support the provision of space for emerging and growth sectors, such as the creative industries, recognising their need for a range of accommodation types. Where appropriate, the Council will support new approaches to the co-location of housing alongside employment uses, subject to the Agent of Change principle whereby it is the developer's responsibility to ensure that impacts on the continuing operation of businesses are mitigated. Where existing occupiers would be impacted by development proposals, support should be provided to mitigate the potential disruption to their operations and, if appropriate, a business relocation strategy agreed in line with the approach set out in the London Plan.





## Affordable workspace

**9.52** Increasing the supply of affordable workspace is a borough-wide priority given land values in Camden and constraints on the supply of suitable accommodation for enterprises and residents to set up and grow businesses.

**9.53** Affordable workspace has a vital role in spreading economic opportunity more widely, ensuring that Camden residents can benefit from the growth they see around them.

**9.54** There is a need to ensure the provision of affordable workspace where it is lacking, and ensure a sufficient range of workspace types are provided for use by different sectors/business uses, including suitable and relevant spaces to support local entrepreneurship and deliver social impact. Furthermore, increasing provision of affordable workspace would give more residents the ability to access a range of amenities and opportunities, including jobs, within walking or cycling distance from home.

**9.55** Many affordable workspaces in London are provided as desk-based co-working facilities, for which there is a continuing demand. Early exemplars of affordable workspace provision have also demonstrated the important role of facilities such as meeting rooms, collaboration areas, kitchens and leisure uses in ensuring affordable workspace is successful and able to meet the needs of a range of occupiers. In some cases, affordable workspace has been provided in tandem with wider community, arts and cultural uses.

**9.56** There is also a lack of some types of specialist space; for example: wet labs (handling various types of chemicals and liquids); move-on spaces for life sciences and university 'spin-outs' enabling companies and innovators to grow their operations; studio, workshop and maker spaces; and business accelerators. These are needed to support the development of existing clusters of activity, enable cross-disciplinary research, and to maximise opportunities from the presence of 'anchor institutions' (major organisations with significant assets, hiring and spending power).

**9.57** The London Plan 2021 states out that boroughs should include affordable workspace policies within their Local Plans subject to consideration of local needs and viability. It defines affordable workspace as that secured at "rents maintained below the market rate for... space for a specific social, cultural or economic development purpose".



# Policy IE4

## Affordable Workspace

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- A.** The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:
1. require all major schemes providing at least 1,000sqm GIA of offices, research and development uses or light industry (use classes E(g)(i), E(g)(ii), E(g)(iii)) to contribute to the delivery of affordable workspace;
  2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years; and
  3. apply the following hierarchy when securing affordable workspace:
    - a. on-site provision of affordable workspace that meets locally identified requirements in terms of type and specification (configuration, fit out, etc.) and addresses the demands of priority sectors and small and medium enterprises;
    - b. off-site provision of affordable workspace on another site in the borough that meets the requirements in A.3.a above. There should be a clear link between the off-site location and priorities for affordable workspace provision identified in the Council's Affordable Workspace Strategy;
    - c. a payment in lieu of provision that can be invested by the Council, which is equivalent to the cost of on-site delivery, in line with the payment in lieu calculator below. This will be used by the Council to fund affordable workspace elsewhere in the borough.
- 
- B.** The Council recognises that different types of affordable workspace are needed depending on location and that the costs of delivery will vary. To ensure the opportunities arising from affordable workspace are optimised, the Council will support a mix of affordable workspace provision with rents, periods of discount and specification based on the requirements of target occupiers. Any provision must be consistent with the definition of affordable workspace set out in the London Plan.
- 
- C.** Where affordable workspace is provided, the Council will expect the applicant to submit an operating plan, setting out what model of affordable workspace is to be provided, sectors/occupiers to be targeted and details of how the space will be managed.
- 
- D.** The Council will expect the affordable workspace element of a mixed-use scheme to be made available for occupation at the same time as any employment floorspace at market rents.
-

## How affordable workspace will be delivered

**9.58** The Council adopted an Affordable Workspace Strategy in 2023. It sets out how the supply of affordable workspace can be increased, and the types of spaces needed. Its key aims are: to support Camden residents, start-ups, small businesses and social enterprises to access the space they need locally; enable entrepreneurs to start and grow businesses; address the needs of SMEs, the Voluntary and Community Sector (VCS) and local social enterprises; and support and retain key growth sectors and clusters where opportunities are provided for Camden residents. The Council is also bringing forward employment opportunities through development schemes, for example, sites in its Community Investment Programme.

**9.59** Policy IE4 sets out the need for larger employment schemes to contribute towards the delivery of affordable workspace. Spaces need to be well-designed to ensure they meet the needs of their intended occupiers and provide usable, stimulating environments in which to work. Priority will be given to firms and residents with a Camden connection. Policy IE6 (Supporting Designated Centres and Essential Services) also sets out that on schemes providing a significant amount of additional retail floorspace (2,500 sqm or more), the Council will seek provision of affordable retail space. In such cases, this will be secured in line with the approach set out in Policy IE4 above.

**9.60** The quantum of affordable workspace sought will be based on the net additional amount of employment floorspace in the proposed scheme (that is, in floorspace in use classes E(g)(i), E(g)(ii), and E(g)(iii)). It will also apply to sui generis uses of a similar nature or character. The Council's preference will be for the affordable workspace to be delivered on-site to meet the needs of Camden enterprises and residents. Basement and windowless spaces will generally be resisted unless this can be demonstrated to meet the needs of a particular sector or operator. Off-site provision may also be accepted where there is a clear link with local workspace priorities and the Council is satisfied that a greater economic impact would be achieved. This may be particularly relevant to applications involving Camden landowners with multiple sites in the borough. The Council will require the preparation of an operating plan, which should be drawn up in conjunction with our Inclusive Economy team.

**9.61** The Council may also accept a financial payment in lieu of provision where evidence is provided demonstrating to its satisfaction why direct delivery of the workspace is not feasible. This may include the provision of evidence relating to viability. We may also waive the requirement for on-site delivery where there is already sufficient affordable workspace to meet local demands, having regard to supply and planning permissions in the area, or where the Council itself considers that a better employment outcome would arise from a payment in lieu; for example, where plans exist to deliver affordable workspace in a local estate or high street. We will also seek a payment in lieu of provision where the affordable workspace provided would be less than 300sqm (except in Hatton Garden), as it can be difficult to find occupiers for very small spaces. Occasionally, a blend of direct provision and a payment-in-lieu may present the most suitable approach. In such circumstances, the overall affordable workspace contribution would still be subject to viability.

**9.62** A payment in lieu should be calculated following the steps below.

A	Calculate the equivalent market rate for the affordable workspace expected by the policy, then
B	Calculate the income multiplier for the market investment yield = 1 divided by the market investment yield
C	Work out capital value of the affordable workspace at full market value = market rent (A) multiplied by income multiplier (B)
D	Calculate the income multiplier for the affordable workspace yield = 1 divided by the affordable workspace yield
E	Work out capital value of the affordable workspace using the affordable workspace yield = discounted market rent (0.5* of A) multiplied by income multiplier (D)
F	The cost of delivering affordable workspace = C minus E
*	or an alternative discount as otherwise agreed with the Council

**9.63** The funds secured through payments in lieu will be invested in projects supported or led by the Council to deliver affordable workspace in other parts of the borough. The Affordable Workspace Strategy identifies such opportunities. Financial contributions for affordable workspace may be used to fund a variety of types/typologies of accommodation including specialist spaces and affordable industrial or retail space in line with objectives set out in the Council's Affordable Workspace Strategy. The Council may agree to the ringfencing of contributions where this would support growth sectors, particularly the need for specialist workspace.

**9.64** Specialist spaces mentioned above will by their nature have additional requirements (bespoke to a particular activity or occupier) such as equipment, access to support networks, sterilisation, containment (of gases, liquids) and a range of ancillary services. Consideration of these wider matters, as well as a headline rent, may be necessary to ensure the uptake and successful operation of new workspace. Short leases can also be an essential requirement. Therefore, where development involves the provision of major science and research-based uses, we will take these wider factors into consideration when negotiating the quantum and terms of the affordable workspace to be provided. There is also very high demand for incubator, accelerator and move-on space in Camden associated with the scaling up of activity within the Knowledge Quarter. The Council may therefore use affordable workspace contributions to secure fully equipped workspace or memberships off-site, where this would achieve significant economic impact and benefits for Camden residents.

## Consideration of the level of provision and discount

**9.65** Policy IE4 takes a flexible approach recognising that access to affordable workspace varies depending on location and that opportunities will vary across different geographies, as well as between sites, depending on factors such as proximity to clusters of businesses, including existing start-ups. The Council will negotiate with developers on a case-by-case basis having regard to all relevant circumstances, including scheme viability. For example, we might accept less than 20% of the space as affordable workspace if it is offered at a peppercorn rent, which is significantly less than 50% of market rents, or where schemes involve an exceptionally large amount of additional floorspace. We also acknowledge that some types of specialist space with bespoke fit-out requirements may not be able to achieve the working benchmark set by the policy. Where affordable workspace is provided which is deemed to meet the Council's requirements, but falls below the 20% threshold, payments will not be required to 'bridge' the difference. Where a scheme is also required to deliver housing under Local Plan Policy H2 (Maximising the Supply of Housing from Mixed Use Schemes), priority will be given to maximising the delivery of permanent self-contained homes, and in particular the provision of affordable housing.

**9.66** Integration between the affordable workspace elements and other employment uses on-site will often have a bearing on the success of the space, creating opportunities for potential collaboration and the sharing of communal spaces and services. The nature of the intended/target occupier is also likely to be relevant to the specification of the affordable workspace and length of discount period required.

**9.67** Part B of Policy IE4 refers to the need to ensure that the specification of the affordable workspace meets the needs of target occupiers. In Camden, this will generally mean the need to provide fully-fitted space, to ensure the proposed workspace can be used in an affordable way or meet specialist needs, although accommodation provided as 'shell and core' may be an acceptable offer in some instances, for example for an artist studio. Furthermore, business rates, utilities and service charges may also be material to understanding affordability for different users.

**9.68** Schemes providing affordable workspace should also be delivered taking account of Camden Planning Guidance on employment sites and business premises, which sets out more detail on how affordable workspace will be secured.



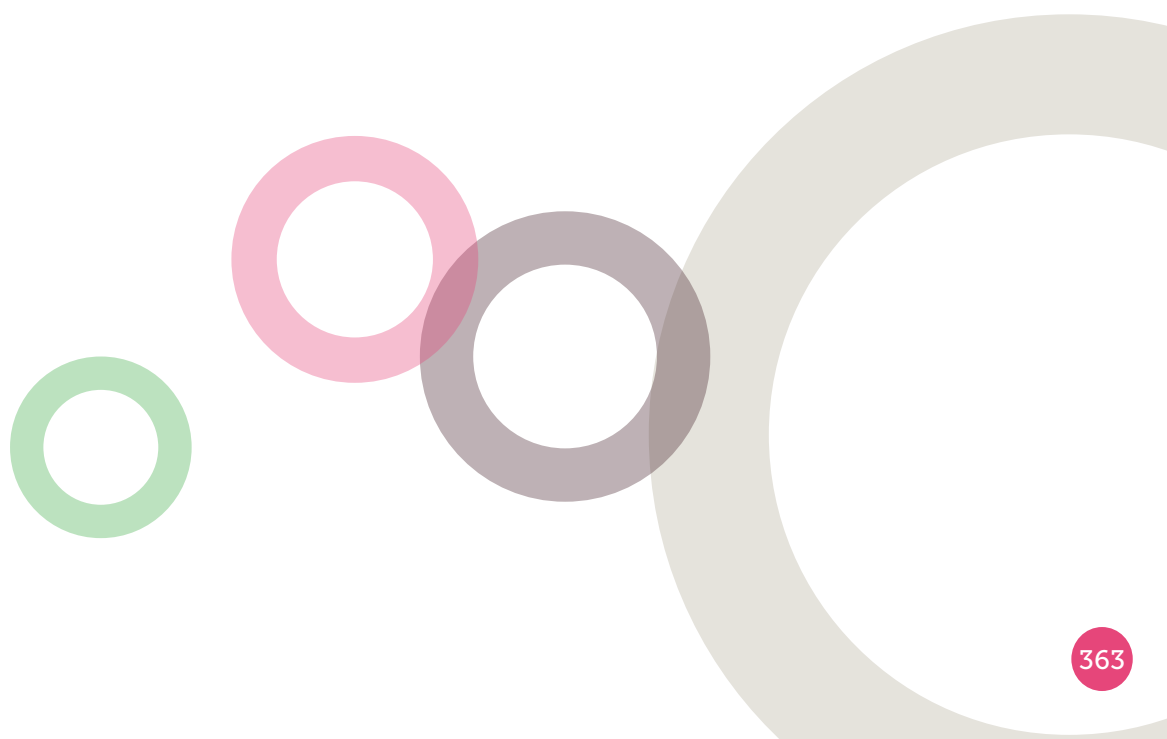


## Hotels and visitor accommodation

**9.69** Hotels and visitor accommodation can make an important contribution to the local economy, providing wider benefits for local businesses and visitor attractions.

**9.70** Visitor accommodation includes bed and breakfast premises, youth hostels, backpacker accommodation, aparthotels, serviced apartments and most other forms of short-stay accommodation intended for occupation for periods of less than 90 days.

**9.71** The Council will steer additional provision of hotels and visitor accommodation to areas of the Central Activities Zone where there are already concentrations of these uses, and to sites within identified town centres, recognising that hotels and visitor accommodation can contribute to the vitality of centres.



# Policy IE5

## Hotels and Visitor Accommodation

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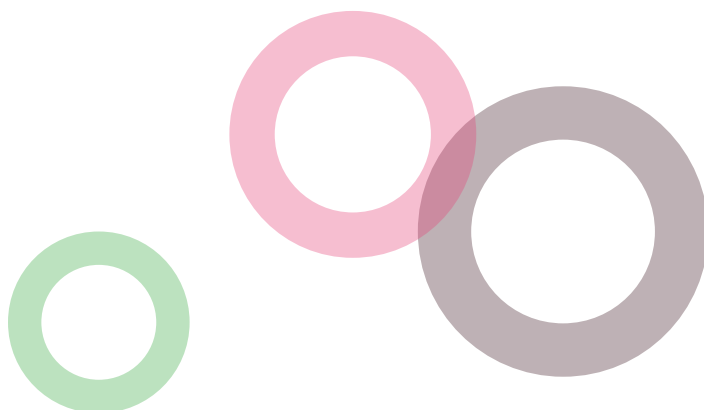
- A.** The Council recognises the importance of the visitor economy in Camden and will therefore protect existing hotels and visitor accommodation and support proposals for additional hotels and visitor accommodation, where these are appropriately sited, and the impact of the proposal on local residents and the surrounding area are appropriately mitigated.
- 
- B.** When considering proposals for additional hotels and visitor accommodation the Council will:
1. require new, large-scale hotels and visitor accommodation of 2,500sqm or more additional hotel floorspace (GIA) to be located in the Central Activities Zone, with preference given to locations with an established tourism character or concentration of existing hotels and visitor accommodation;
  2. support smaller and medium-sized hotels and visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road / Swiss Cottage and in locations with an established commercial or mixed-use character in the Central Activities Zone;
  3. apply the sequential test where additional hotel accommodation is proposed outside of a town centre; and
  4. expect all hotels and visitor accommodation in Camden to:
    - a. be easily accessible by public transport;
    - b. not lead to the loss of permanent residential accommodation or housing secured through an unimplemented planning permission;
    - c. not prejudice the delivery of new homes on sites allocated for development in the Local Plan; and
    - d. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems.
- 
- C.** The loss of hotels and visitor accommodation in the borough will only be considered acceptable where it can be demonstrated to the Council's satisfaction that:
1. a marketing exercise has been undertaken, which demonstrates that the hotel or visitor accommodation is no longer fit for purpose; and
  2. the upgrading or refurbishment of the premises is not a viable option; or
  3. the premises is located away from commercial or highly accessible areas.
- 
- D.** Where the Council is satisfied that a premises is no longer suitable for continued use as a hotel or visitor accommodation the Council's preferred alternative use is housing.
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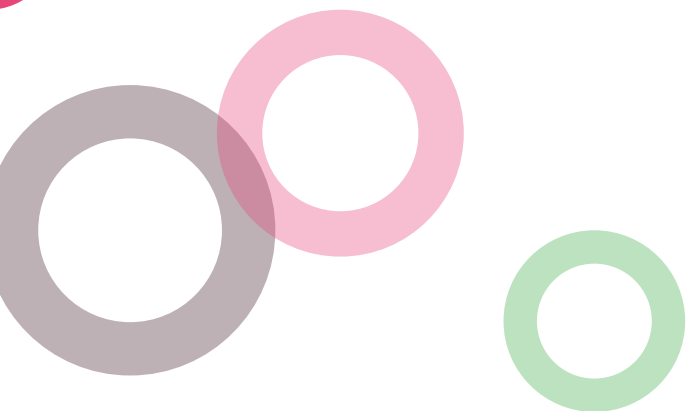
**9.72** The London Plan states that a sufficient supply and range of “serviced accommodation” should be maintained and considers this to be an appropriate use within the Central Activities Zone except in wholly residential streets or predominantly residential neighbourhoods. By serviced accommodation, the London Plan is referring to hotels, bed and breakfasts and hostels providing catering and cleaning for residents; we consider this to be equivalent to the terminology ‘hotels and visitor accommodation’ used in this policy. Suitable sites for these uses are likely to be where there is an existing concentration of hotels and visitor accommodation.

**9.73** Policy IE5 supports proposals for additional hotels and visitor accommodation, where these that are appropriately sited, and where the impacts of the proposal on local residents and the surrounding area are appropriately mitigated. Due to the potential impacts arising from significant numbers of people arriving and leaving visitor premises, the policy expects larger hotels and visitor accommodation to come forward on suitable sites within the Central Activities Zone. The policy defines larger hotels and visitor accommodation as being 2,500sqm or more GIA, which is considered to be broadly equivalent to 100 additional hotel rooms. Smaller hotels and visitor accommodation are considered to be appropriate uses in identified town centres and areas with an established commercial/mixed use character in the Central Activities Zone. When considering proposals for additional hotels and visitor accommodation we will also apply the requirements set out in the London Plan, which seek to secure a proportion of rooms suitable for people using wheelchairs and other people who would benefit from accessibility measures.

**9.74** The National Planning Policy Framework identifies hotels as a main town centre use and states that Councils should apply a sequential test where a proposed hotel would not be situated in an existing centre. We will therefore apply this approach for all schemes involving hotels and visitor accommodation outside of the CAZ, giving preference to edge-of-centres sites and only if suitable sites are not available, will any out of centre locations be considered.

**9.75** While the Council welcomes continuing investment in hotels and visitor accommodation, it is vital that this does not undermine the need to provide a sufficient supply of housing. We will therefore resist proposals for hotels or visitor accommodation on sites currently used for housing, where there is an unimplemented planning permission for housing or where this would prejudice the delivery of new homes on sites allocated for development in the Local Plan. New hotels and visitor accommodation will therefore only be supported in the locations set out in Part B of Policy IE5 above.





**9.76** The Council is concerned about the rise in short-term lets resulting in the loss of permanent homes, including where entire buildings are being used as blocks of short-term let accommodation. The Council will continue to take enforcement action where properties are found to be in breach of planning regulations and seek further controls from government to enable the proliferation of this accommodation to be more effectively managed.

**9.77** We also acknowledge there is a growing market for hybrid uses, for example combining a range of business and commercial uses with hotels or visitor accommodation in the same building. Such proposals will be considered on their merits subject to the applicant being able to demonstrate significant employment benefits (compared against conventional office use) and that any impacts on existing clusters of office uses can be mitigated.

**9.78** More generally, additional hotels and visitor accommodation should be capable of being successfully integrated alongside other land uses and not result in unacceptable impacts on the local area or the community in line with Local Plan policies on amenity.

**9.79** Furthermore, proposals for large-scale hotels and visitor accommodation will be expected to contribute to employment and training initiatives in the borough, in accordance with Policy IE1 (Delivering a Successful and Inclusive Economy).

**9.80** Where a proposed scheme would result in the loss of an existing hotel or visitor accommodation, the Council will request marketing and viability evidence to be provided in accordance with Part C of Policy IE5 above, unless the hotel is located away from commercial/mixed use areas in the Central Activities Zone or outside of a town centre. Where the Council is satisfied that a premises is no longer suitable for continued use as a hotel or visitor accommodation the Council's preferred alternative use is housing.







## Supporting designated centres and essential services

**9.81** Camden's centres are a focus for activity and community life and provide character and identity to local areas and the borough as a whole.

**9.82** They are places of employment, shopping, leisure, and services and can be important for social, community and cultural exchange by providing places where people can meet and interact. Beyond centres, there are also shopping and food and drink facilities within major railway stations and small standalone shops that provide an essential role.

**9.83** Traditional retail-based centres face challenges from changes in consumer behaviour, new retail models, the growth in online shopping and competition from out-of-centre retail development. Town and neighbourhood centres are under pressure from a range of issues, including the impact of the cost-of-living crisis and hybrid working on 'footfall' (the number of people using a centre). This highlights the importance of allowing high streets to diversify and adapt over time, in terms of managing land uses, whilst ensuring that the vitality, character and role of individual centres is not put at risk. It is also acknowledged that some smaller centres in Camden are limited in terms of their offer/mix but nevertheless meet local needs.

**9.84** The Camden Future High Streets prospectus was published to help inspire and guide change as high streets adapt to a range of challenges. It envisages high streets that are centres of creativity and innovation, providing goods, services and employment which provide material benefit for the local community and offer environments that are sustainable and accessible for all. The pandemic has strengthened recognition of centres being local hubs providing places to meet, socialise and helping to build a sense of community and opportunity for everyone. Public engagement carried out to inform the development of Council strategies, such as the Evening and Night Time Economy, has found that some residents feel they are not able to enjoy their neighbourhood because of a lack of free or affordable places to meet up or visit.

**9.85** The Council's evidence, including retail survey data, shows that most of our centres have low vacancy levels against London and national comparators and the majority have footfall at, or above, the pre-pandemic situation. Centres that have traditionally relied on footfall from workers are experiencing the greatest need to adapt, while centres focussed on local catchments or in proximity to key attractions tend to be performing well. The resilience of particularly larger centres is likely to benefit from having a wider range of uses and activities, including the provision of affordable workspace and temporary or meanwhile uses. Having a more diverse and flexible mix of uses, services and amenities will help to generate visits, footfall and spend. The upper floors of retail frontages will also have a role in providing additional permanent self-contained homes (the Local Plan's priority use).

**9.86** The Local Plan focuses on sustaining and enhancing centres, having regard to their distinctive roles, character and accessibility, while allowing beneficial change that meets local needs and priorities, including supporting the visitor / destination role of the West End and existing retail clusters in the Central Activities Zone (CAZ). The Council is taking an integrated approach to supporting town centres, working across services and with partners to achieve a range of social, economic and environmental benefits. Given this, the Local Plan seeks to resist the further proliferation of some uses where evidence shows they could harm the health and well-being of residents.

**9.87** Both designated town centres and the CAZ are suitable for accommodating new retail, leisure, office and other main town centre uses, commensurate with their scale. Neighbourhood centres are designated primarily to cater for local day-to-day shopping needs and provide services for the community (laundrette, pharmacy, hairdressers etc.). Some also have concentrations of more specialist, comparison-based retailing. Specialist Areas are distinguished by their clusters of independent and niche retailing, or for the range of food and drink uses, and some may be a visitor attraction in their own right. There are also some non-designated areas, such as at railway stations, which predominantly serve commuters.

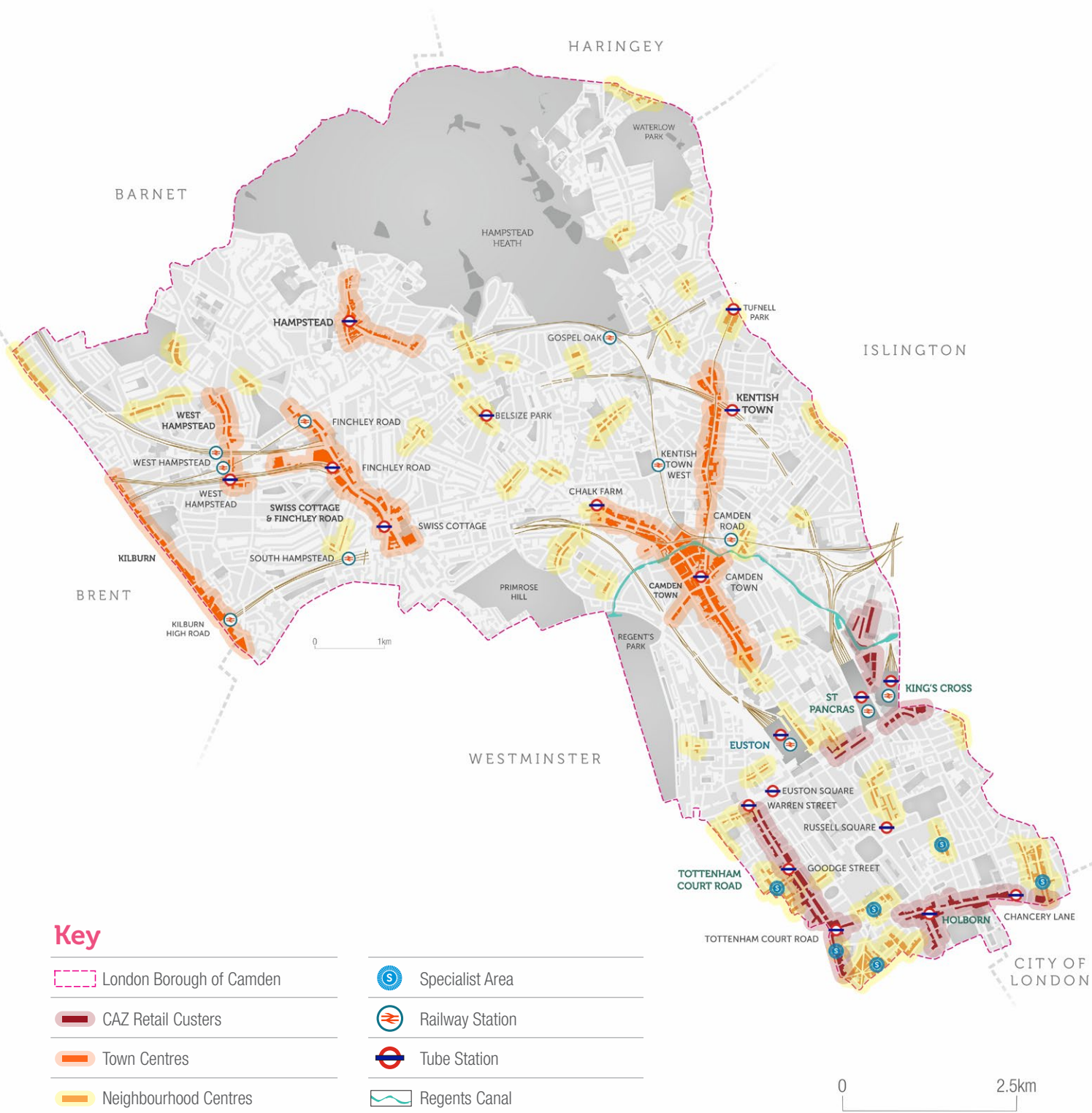
**9.88** Evening and night time uses in the borough are focussed on commercial/mixed use areas of the Central Activities Zone and Camden Town town centre. Both contain a diverse range of cultural assets and entertainment uses including theatres, cinemas, live music venues and comedy clubs. These uses attract significant numbers of visitors and tourists to the borough and have a vital role in supporting jobs and economic activity and planning has an important role in ensuring the evening and night economy operates in a safe, inclusive and well managed way.

**9.89** Camden's network of centres is illustrated on Figure 21 and set out in Table 10 below.

Table 10 | Camden's network of centres

<b>CAZ RETAIL CLUSTERS</b>
High Holborn / Kingsway
King's Cross / St Pancras
Tottenham Court Road / Charing Cross Road / New Oxford Street
Coal Drops Yard
King's Boulevard
<b>TOWN CENTRES</b>
Camden Town
Finchley Road / Swiss Cottage
Hampstead
Kentish Town
Kilburn High Road
West Hampstead
<b>NEIGHBOURHOOD CENTRES</b>
There are 39 neighbourhood centres in the borough, which are identified on the Policies Map
<b>SPECIALIST AREAS</b>
Covent Garden
Denmark Street
Hatton Garden
Museum Street
Charlotte Street
Lamb's Conduit Street

Figure 21:  
Camden's Centres



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# Policy IE6

## Supporting Designated Centres and Essential Services

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- A.** The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. The Council will:
1. seek to protect and enhance the role and distinctive character of each of Camden's centres, ensuring that new development is of an appropriate type, scale and character for the centre in which it is located, having regard to the network of centres set out in Table 10 and their associated catchments;
  2. support the provision of additional retail floorspace over the Plan period to provide for and maintain a range of shopping opportunities, including top-up facilities to meet the essential needs of local communities, and to enhance the offer of individual centres;
  3. support other cultural, community, leisure and service-oriented uses where they positively contribute to the character and role of the centre in which they are located and provided this does not materially reduce access to other essential services used by the local community;
  4. support the use of vacant or under-utilised properties for temporary (meanwhile) uses that will benefit a centre's vitality and viability;
  5. support proposals which would significantly change the role of an existing CAZ retail cluster or town centre, where this forms part of a comprehensive planned approach for the area;
  6. give priority to sustaining the existing role of neighbourhood centres and specialist areas. The loss of Class E uses will be supported where there is evidence that the centre is in decline and struggling relative to other centres in Camden performing a similar role and function and where the proposed alternative use would help to reinforce the vitality and viability of the rest of the centre;
  7. resist the loss of active ground floor uses visited by members of the public to ensure the vitality of the centre is retained;
  8. seek to widen the range of evening and night-time economy uses where there are existing concentrations of these uses and where this would be beneficial for local residents and people working on night shifts;
  9. resist proposals involving the formation of larger units where this would harm the character or role of a centre, particularly where this would be detrimental to the supply of low cost and affordable space and the centre has an established role in accommodating independent and specialist retail;

# Policy IE6

## Supporting Designated Centres and Essential Services

10. expect developments providing 2,500sqm or more of retail floorspace to include a proportion of smaller units, including floorspace available at a discount to market rents;
11. seek to retain shops and other valued amenities outside of designated centres where they have an essential role in meeting the needs of local communities;
12. expect new frontages to be well designed and respond to positive examples in the local street scene in terms of proportion and local impact. Excessively sized fascias and a proliferation of signage or adverts will be resisted. The Council will expect historic shopfronts and features to be retained; and
13. seek to secure contributions towards improving infrastructure, including environmental improvements (such as bins and benches), better walking, cycling and public transport, and community safety measures.

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### Sequential approach

- B.** The Council will apply a sequential approach to proposals for the provision of main town centre uses, as defined in the National Planning Practice Framework, outside of the designated town centres listed in Table 7 above, to support the borough's network of centres. These uses should be located within designated centres and only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or, if no edge of centre locations are available, out of centre locations. In applying the sequential approach, we will consider the likelihood of suitable sites becoming available in designated centres or edge of centre locations within a reasonable period (i.e. the next 3 years).
  - C.** The Council will require an impact assessment for developments of 2,500 sqm or more that:
    1. would be in an edge of centre or out of centre location; or
    2. would be in an existing centre and have the potential to have a harmful impact on other centres.
  - D.** The Impact Assessment will be required to demonstrate that the proposal would not harm the vitality and viability of centres or the delivery of major planned investment.
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## Protecting the vitality and viability of centres

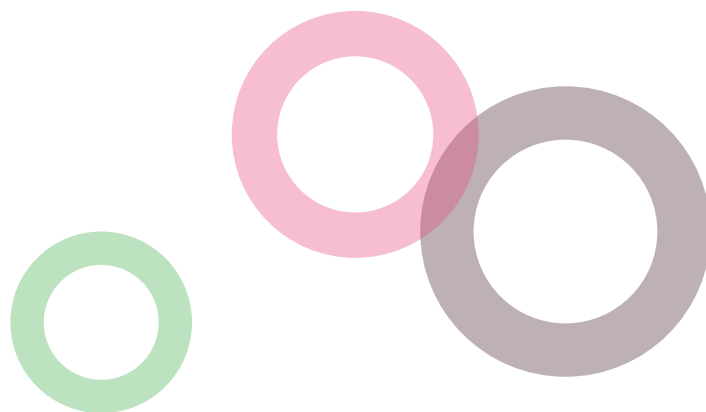
**9.90** The Council will protect and enhance the role and character of each of Camden's centres by assessing proposals against Policy IE6, and having regard to the descriptions and planning objectives for individual centres set out in Camden Planning Guidance: Town Centres and Retail. It is recognised that there are several centres in Camden that form part of a wider town or neighbourhood centre that extends beyond the borough boundary. When assessing proposals at these locations we will give consideration to the full extent of the centre, not just the part within Camden.

**9.91** Councils have much less ability to manage the mix of shopping, and some food and drink uses in centres since the introduction of Use Class E brought together a wide range of uses. Changes between uses within Class E do not constitute development and therefore planning permission is no longer required. Where it is feasible to do so (such as for the redevelopment of existing premises), we may seek the provision of a particular type of Class E floorspace, for example where this is necessary to sustain the health of the centre.

**9.92** As part of our strategy for protecting town and neighbourhood centres and CAZ retail clusters, the Council has used its planning powers to introduce two Article 4 directions to remove a permitted development right that allows uses within Class E (Commercial, Business and Service) to change to residential use without planning permission. This means that planning permission is again required for such changes of use and the Council can assess proposals against our planning policies, including consideration of the impact on the centre.

**9.93** The National Planning Policy Framework retains reference to Councils defining 'primary shopping areas'; that is, areas where retail development is concentrated. We intend to carry forward existing 'Primary Frontages' on the Policies Map, as primary shopping areas, as this will provide the ability to manage the over-concentration of particular 'sui generis' uses (which do not fall within any planning use class), which may be detrimental to a centre's established character or role. We will also continue to apply our amenity and transport policies to ensure that certain uses do not result in unacceptable impacts arising from noise, odour, waste or from deliveries and servicing, with larger proposals expected to be situated in locations with good public transport accessibility.

**9.94** The National Planning Policy Framework also advocates the use of the sequential test and impact assessments by Councils to ensure that main town centre uses are provided in suitable locations. In Camden, this will apply to designated town centre boundaries. The approach is well-established and gives preference to 'edge of centre' locations when suitable sites cannot be found within a designated centre boundary. Where development is proposed in an edge of centre location, the Council will seek proposals that are well-related to existing uses in the centre.



## Future floorspace needs

**9.95** The Council's Retail and High Streets Needs Assessment ('the Retail Study') has considered current capacity and future demand for retail uses. The Retail Study estimates requirements for additional convenience and comparison floorspace from 2023 to 2041 based on likely expenditure and population growth. It envisages that online spend remains high but will grow at a slower rate than in the recent past. The study found that overall demand for additional convenience and comparison space is likely to be low over the Plan period. The amounts are such that this need could be satisfied largely through the reoccupation of vacant units. There are also a number of sites with planning permission for retail floorspace, some of which are under construction. Implementation of these schemes would reduce this demand even further.

**9.96** It is considered that CAZ retail clusters and designated town centres have the most capacity to support change and growth. The Council has prepared planning frameworks for the key areas where change is expected. The Local Plan's site allocations identify some sites where further retail and leisure uses are likely to be accommodated, often through mixed-use developments. This includes the provision of low-cost retail space as part of the planning consent for the 02 site in Finchley Road. It is envisaged that over the Plan period, the development of Euston Station will allow for new retail and leisure uses to serve commuters and local communities. Further detail on what is expected is set out in the Euston Area Plan.

**9.97** The Council's Retail Study found that some centres have a potential unmet need for additional convenience and comparison floorspace, particularly towards the end of the Plan period. However, in reality the scale of need is such that it can be readily accommodated through the turnover of existing premises.

## The changing role of centres

**9.98** Many centres in Camden have a stable retail role and an established character. However, restructuring in the retail sector and volatility in consumer spending underlines the need for centres to be able to adapt rapidly to change. Since the introduction of Class E, pubs and bars have been designated as 'sui generis' uses, which means they enjoy greater protection from changes to the wide range of activities covered by Class E. These uses can make a positive contribution to a centre and successfully integrate with the centre's existing role. However, there may be a need to limit their proliferation, where concentrations of such uses could undermine the health of the centre in terms of its appeal, or have unacceptable impacts on surrounding uses or residential populations.

**9.99** When there are vacant premises in centres, particularly outside of the primary areas or in neighbourhood centres, this can provide an opportunity to introduce new uses and activities that benefit local communities, especially where start-ups, entrepreneurs and voluntary, community sector and third sector organisations can struggle to secure premises at rents they can afford. Examples include affordable workspace, circular economy uses (such as repair shops), artist studios and cultural activities. The Council will support the reuse of premises as meanwhile uses in line with Policy IE1 (Growing a Successful and Inclusive Economy). We will give priority to proposals that can demonstrate a social, cultural or economic development benefit.

**9.100** Neighbourhood centres are much smaller in scale than designated town centres and mainly focussed on meeting the essential needs of local communities, while Specialist Areas are much more significant in terms of their visitor draw. The Retail Study identified the individual role and mix of uses in these centres and found they are functioning well. Changes in these centres are expected to be limited. Where proposals do come forward, they should contribute positively to the health of the centre, or area, and be compatible with its size and capacity.

**9.101** The Council will continue to actively monitor changes in centres through undertaking periodic retail surveys (with the findings hosted on Camden Open Data).



## Ground floor uses

**9.102** Key to the vitality and viability of centres is retaining a cohesive mix of uses at ground floor level. Where frontages become broken, it can impact on the appeal of a centre. While the Local Plan supports additional housing in centres, where shops, food and drink or other local services at the ground floor level are converted to homes they are likely to stay in residential use permanently, meaning their potential benefit for commercial or community functions is lost.

**9.103** Ground and basement floors can be particularly exposed in terms of noise and disturbance and poor air quality due to their proximity to busy roads, junctions and transport infrastructure and are therefore often not suitable for permanent living accommodation.

**9.104** Given this, we will seek to retain active uses on the ground floor of centres. These are considered uses visited by members of the public and related to the role of the designated centre. Exceptions will be allowed for affordable workspace where this addresses the long-term vacancy of a unit.

## Evening and night time economy

**9.105** The Council has an Evening and Night Time Economy Strategy (ETNE Strategy) that looks at ways of increasing the social and economic benefits arising from evening and night-time activity, particularly through the introduction of new business and cultural activities and extending the hours of existing cultural and community uses and visitor attractions beyond 6pm. The borough's evening and night time economy is the sixth largest nationally with the broadest mix of uses focussed within Camden's part of the West End and in Camden Town, including important cultural and performance spaces such as KOKO and The Roundhouse. However, in recent years, dedicated spaces for protected groups, such as LGBT+ communities have closed, and the eclectic mix of live music venues has been threatened by severe financial pressures. The ETNE Strategy wants the evening and night-time economy to remain dynamic and to grow responsibly, create good work opportunities and be accessible to all. It also highlights concerns about the impacts of homogenisation and the importance of protecting what makes Camden unique.

**9.106** The Council will support the more diverse use of venues, spaces and amenities, particularly where this helps to define the evening offer beyond alcohol-led activity. Local surveys suggest that older residents, women and some of our most easily ignored communities, including young people, can feel excluded due to the cost of going out, or concerns about personal safety. There is also an under-provision of attractions oriented towards families. Over 10% of Camden residents live in a recognised 'hotspot' for evening and night time activity and while there are benefits from such close access, impacts from noise, anti-social behaviour and commercial catering on local air quality highlight the continuing importance of assessing the amenity of proposals in line with Local Plan policies and ensuring effective management and operational plans are put in place.

**9.107** The ETNE Strategy also draws attention to the high proportion of night time workers in Camden, with particular challenges around well-being, pay, job security and the provision of training and development being reported. Night shift workers can also find the range of activities/uses much more limited with difficulties in accessing even basic services. Where our planning powers allow, we will support efforts to increase the diversity of evening and night-time uses, having regard to the impacts on local residents and existing venues as well as the specific needs of night shift workers.

## Smaller premises and essential out of centre services

**9.108** The Council will seek the retention of smaller premises in centres where these form an established part of the centre's character and the premises has a potential economic role, and where a specific local need is identified in a neighbourhood plan. We will take into account the availability of smaller premises elsewhere in the centre and in other centres nearby. For large major schemes, we will expect the applicant to consider the provision of smaller units, including discounted workspace to ensure businesses of all sizes have access to suitable space. The approach will be applied flexibly having regard to the function and role of the centre in which the development is proposed; whether the scheme is in an established frontage; current vacancy levels; and the total supply of smaller units within the centre. There may also be a need for some of this floorspace to be provided below market rents to support start-up and independent businesses. The Council's 'Affordable Workspace Strategy' identifies an unmet need for affordable retail in parts of the borough. It is most likely to be deliverable on the largest sites (ie. providing 2,500 sqm or more of retail floorspace) and could potentially form part of a scheme's affordable workspace offer secured through Policy IE4 (Affordable Workspace).

**9.109** The introduction of Class E means it is harder to ensure the protection of small, stand-alone convenience stores (sometimes known as 'corner shops') as it is possible to change to some non-retail uses without planning permission. As part of the Retail Study, we have reviewed the role of a number of smaller non-designated parades and, consequently, two new neighbourhood centres are proposed to be designated in King's Cross Road and Haverstock Hill south (Steele's Village). We will also seek to avoid the loss of essential services (such as a corner shop or café) where they have a longstanding and valued role in serving residents living nearby. Furthermore, the Council has long recognised the importance of public houses for the social fabric of our communities and Policy SC7 (Public Houses) sets out how these premises will be safeguarded.

## Design and environmental quality

**9.110** In line with the Local Plan's design policies, we will expect new premises to respond creatively to their context. New shopfronts will be expected to respond closely to the prevailing scale, form, proportions and materials. In some centres, frontages have a marked uniformity, with fine examples of shops and services being created on the ground floors of town houses and mansion blocks. Where historic shopfronts positively contribute to local character, they should be retained. In line with the approach for ground floors, active frontages will be sought as these add interest and vitality where passers-by are able to see into the building and provide safety through 'eyes on the street'.

**9.111** The quality of the environment and its accessibility can have a significant impact on how well a centre performs. The Council will expect developments to contribute to local infrastructure projects, proportionate to the scale and impact of the scheme. It is expected that centres will continue to be a focus for efforts to improve active forms of travel and create greener, healthier places. We will also support measures to provide more disability and age-friendly environments, such as new seating, ramps and the removal of street 'clutter', alongside improvements to ensure a centre works better for all; for example, providing more litter bins and public conveniences.

**9.112** The Local Plan is accompanied by an Infrastructure Delivery Plan which sets out interventions that will help to better connect centres with surrounding neighbourhoods. Furthermore, the Retail Study features 'health checks' for all centres which consider overall environmental quality, including perceptions of how well a centre is managed or maintained.

**9.113** The ETNE Strategy identifies how Camden can be a safe, welcoming and inclusive place to spend time in the evening and at night, for example through improved lighting; greater participation of licensees in the stewardship of public space outside of their premises, and initiatives such as the Camden Safety Hubs. We will therefore seek contributions from development to enhance access and community safety.





## Hot food takeaways

**9.114** In common with the situation nationally, there are concerns about the high and increasing levels of obesity in Camden.

**9.116** Childhood obesity is associated with physical and mental health conditions. Children that are overweight or obese are also likely to remain so into adulthood, with a greater risk of poor health and well-being as a result.

**9.117** The National Planning Policy Framework states that policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, including having access to healthy food. In planning for the local community's needs, councils are expected to give regard to local health strategies and should aim to improve health for all sections of the community.

**9.118** The London Plan seeks to create a healthier food environment within the context of reducing health inequalities overall, increasing the availability of healthy food, and restricting unhealthy options. It states that boroughs should manage clusters of retail uses, having regard to their positive and negative impact on the objectives of the Plan, including mental and physical health and well-being. It is considered that the approach set out in the London Plan is relevant to Camden's circumstances and is necessary to address concerns about the consumption of high calorie fast food in the borough.

**9.119** The Council will apply the approach to managing hot food takeaways set out in Policy IE7 based on local evidence and data.

# Policy IE7

## Hot Food Takeaways

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- A.** To minimise harm to health and well-being the Council will:
1. resist new hot food takeaways where they would be located within a 400 metre walking distance of the entrance or exit of an existing or proposed primary or secondary school or a sensitive use;
  2. resist new hot food takeaways elsewhere in the borough, where these would increase the total number of hot food takeaways within a designated centre, above the current Camden Retail Survey baseline; and
  3. require applicants for new hot food takeaways to undertake a Health Impact Assessment in accordance with Policy S1 (Health and Well-being) to demonstrate that the proposal will not impact on existing health needs and levels of overweight and obesity in the local area.
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**9.120** The Council's data shows there are already high concentrations of hot food takeaways in some centres, including in proximity to schools. There also tend to be higher numbers of takeaways in areas with higher proportions of children experiencing weight issues. It is acknowledged that the policy is only able to prevent the further proliferation of hot food takeaways as part of a wider set of actions to promote healthy lifestyles. This includes the Local Plan's support for increased access to nutritious and affordable food through community food growing and a range of initiatives being undertaken beyond planning.

**9.121** The policy extends the London Plan's approach to other sensitive uses such as youth clubs and children's play areas. 400 metres is a distance considered to be equivalent to a 5-minute walk. When applied geographically, the 400 metre buffer covers most of Camden's centres with some exceptions. Given this, elsewhere in the borough (outside of the buffer), it is considered necessary to have a limit on the proportion of these uses due to their impact on public health. In such cases, the total number of takeaways in the centre should not exceed that recorded at the time of the Council's latest Camden Retail survey (these are available at the Council's Open Data site).

**9.122** Where new hot food takeaways are proposed we will expect applicants to undertake a Health Impact Assessment (HIA) in line with Policy SC1 (Improving Health and Wellbeing). HIAs will also be sought for delivery-led food businesses due to their role in facilitating orders of fast food, see Policy IE9 (Hot Food Takeaways). As part of the HIA, the applicant should consider the role of healthier menu options.





## Gambling uses

**9.123** Gambling Gambling can be a source of serious harm to individuals, families and communities, with the most socio-economically disadvantaged groups experiencing the highest levels of problem gambling and the greatest proportions of residents at risk of harm.

**9.124** Gambling can negatively affect the physical and psychological health of people who gamble, and affect the well-being of those around them. Gambling premises in Camden tend to be concentrated where the population is much more vulnerable to gambling-related harm, and therefore Policy IE8 seeks to resist further clustering in these areas. The policy also resists new gambling premises within a walking distance of schools and in other sensitive locations.

**9.125** The Council considers limiting further proliferation of gambling uses is a beneficial intervention in those parts of the borough where local populations are at disproportionate risk. Gambling-related uses include betting shops/bookmakers, adult gaming centres and casinos. We are taking a data-driven approach, resisting further openings of these uses based on where the relative risks of problem gambling are highest.

# Policy IE8

## Gambling Uses

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- A.** To minimise the impact of gambling-related uses on the health and well-being of Camden's communities the Council will resist new gambling-related uses, and extensions to existing gambling related uses, within:
1. the Central Activities Zone; the town centres of Camden Town, Kentish Town, Finchley Road/Swiss Cottage, Kilburn High Road and West Hampstead; Specialist Areas; and neighbourhood centres, where the proposal would increase the total number of gambling uses within the designated centre, above the current Camden Retail Survey baseline; and
  2. a 400m walking distance of the entrance or exit of an existing or proposed primary or secondary school, or in proximity to sensitive uses.
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- B.** The Council will require applicants providing new gambling-related uses to undertake a Health Impact Assessment in accordance with Policy SC1 (Health and Well-being) to demonstrate that the proposal will seek to minimise the likelihood of gambling-related harm, particularly for vulnerable individuals.
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**9.126** The Council has mapped gambling-related harm based on a variety of place-based factors including age, ethnicity, mental health and use of gambling treatment. This shows that the areas of greatest vulnerability to gambling-related harm are in the south of the borough and areas within or near to designated town centres. This corresponds to where there are the greatest number of gambling uses, with the highest concentration found in Camden Town town centre. Siting new gambling premises in these areas would increase the risk of gambling-related harm for communities living in these areas. Resisting planning applications for new gambling premises, including extensions to existing facilities, is therefore necessary to reduce the likelihood of even greater.

**9.127** Children and young people (under-18s) are unlikely to gamble in betting shops. However, displays in shop windows are highly visible to young people and this exposure makes young people who already gamble increase their gambling activity (even if this is not in the betting shop itself). We will therefore resist new gambling premises within a 400m walking distance of schools. Gambling uses will also be considered to be inappropriate where sited in proximity to sensitive uses, such as debt and addiction support services, due to the risk this presents for those most vulnerable people in our communities, to gambling-related harm. Gambling uses are also not considered to be appropriate in any Specialist Areas due to their defined role. Baseline numbers of gambling-related uses will be taken from Camden's latest Retail survey data (available at the Council's Open Data site).

**9.128** Where gambling-related uses are proposed we will expect applicants to undertake a Health Impact Assessment (HIA) in line with Policy SC1 (Improving Health and Well-being). As part of the HIA, the applicant should consider how any harms arising from gambling-related activity can be minimised, and preferably avoided.







## Delivery-led food businesses

**9.129** There has recently been a significant rise in the demand for sites to provide delivery-led food businesses (sometimes referred to as 'dark kitchens'): standalone food preparation facilities for cafes, restaurants and takeaways whose food is delivered directly to the consumer.

**9.130** These are generally internet-based services and are popular due to their convenience and rapid delivery times.

**9.131** While there are potential sustainability benefits from consolidating and delivering multiple orders, the intensive activity associated with their use can cause significant levels of disturbance for their immediate neighbours due to noise and odour. There can also be safety issues associated with the frequency of delivery vehicles movements involved. Such uses can also be linked to concerns about local public health.

**9.132** Policy IE9 seeks to ensure that the impact of delivery-led food businesses is effectively managed.

# Policy IE9

## Delivery-led Food Businesses

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- A.** The Council will only permit proposals for delivery-led food businesses ('dark kitchens') where:
1. there will be no unacceptable adverse impacts on neighbours or the local area from the premises or from delivery vehicles and staff;
  2. vehicle movements are minimised and sustainable transport practices have been adopted with priority given to bicycles and cargo bikes. The Council may set limits on the number of vehicle movements and hours of operation;
  3. the premises will operate in accordance with an approved Travel Plan and Delivery and Servicing Management Plan; and
  4. they are accompanied by a Health Impact Assessment demonstrating that the proposal will not impact on existing health needs and levels of overweight and obesity in the area and that consideration has been given to improving access to healthy food options.
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**9.133** New delivery-led food businesses should be avoided where they would be in proximity to residential uses, unless it can be demonstrated to the Council's satisfaction, that there will be no unacceptable adverse impacts on neighbours or the local area. Promoters of 'dark kitchens' will be expected to demonstrate that they have undertaken a borough-wide search for suitable premises and that no other suitable premises are available, that would give rise to less adverse impacts on the local community.

**9.134** Delivery-led food businesses are often found within larger employment sites helping to achieve separation from residential properties. The nature of these operations means there tend to be a large number of vehicle movements which can create nuisance for nearby residents and the wider neighbourhood. This may be exacerbated where there is an over-concentration of these uses in one location. Applicants will be expected to make commitments to use low emission and low noise vehicles, with preference for deliveries via bicycle where possible.

**9.135** Due to the frequency of collections and deliveries, the Council may also require a marshal to be provided during hours of operation to ensure any impacts can be managed successfully. There is also a concern from a public health perspective that delivery-led food businesses could increase unhealthy food choices and lead to significant health consequences, as set out in Policy IE7 (Hot Food Takeaways). The Council will therefore require applicants to prepare a Health Impact Assessment (HIA) setting out how access to healthy food options will be provided. Further information on Health Impact Assessments is set out in the supporting text of Policy SC1 (Improving Health and Well-being).



## Markets

**9.136** Camden Town has an internationally renowned concentration of markets which are an important attraction for visitors and tourists and a defining part of the borough's identity.

**9.137** There are also eight street markets in Camden, which can provide an important source of fresh food, often grown more locally than food from supermarkets. In line with local public health objectives, this role can potentially be strengthened to further improve residents' access to affordable and nutritious food.

**9.138** Markets can be important places of social and cultural exchange and in some cases help to meet the specialist food needs of ethnic communities. They can have an important role in the local supply chain by providing opportunities for local manufacturers and artists to sell products in a low-cost way. In Camden Town, stalls selling goods to the public are complemented by a variety of leisure and entertainment uses. The policy approach set out below focusses on the economic role of markets in supporting local entrepreneurship and their importance in meeting the need of surrounding communities for goods and services, where gaps in provision exist. The policy also seeks to retain existing permanent market sites in the borough.

# Policy IE10

## Markets

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- A.** The Council will promote and protect markets having regard to their distinctive social and economic character and role and ability to meet the needs of the local community and visitors. The Council will:
1. consider how proposals contribute to the character, role and functions of existing markets and the centre in which the scheme is located;
  2. request applicants for any larger schemes (1,000sqm and above) directly impacting on a market to provide evidence of how the development contributes to a long-term vision for the market developed by the operator. The applicant will be required to demonstrate to the Council's satisfaction how the proposals will help to sustain the long-term success and viability of the core market use;
  3. seek the provision of stalls and spaces at a variety of rents, with consideration given to how start-up businesses can be supported;
  4. expect suitable proposals to improve the local community's access to essential goods and services;
  5. resist the permanent loss of market uses unless comparable replacement provision is made, or there it is demonstrated to the Council's satisfaction there is no demand for continued market use; and
  6. support new/improved markets that will not cause individual or cumulative harm to the local area and are well-designed for their users in terms of layout, accessibility and sustainability.
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**9.139** Due to their prominent location and intensity of use, markets are often an important contributor to the vitality and viability of centres. Changes to markets can affect their character and consequently the character and attraction of the centre. When assessing proposals, we will expect proposals to consider, and where appropriate, reflect this character. Within some centres, the Council has brought forward planning frameworks helping to guide multiple development proposals as part of an overall vision and objectives for managing change in a centre, including existing market sites. These frameworks are a material planning consideration.

**9.140** Markets can perform multiple roles such as providing access to healthy food, and a range of goods, helping to complement the wider town centre offer and provide opportunities for new businesses to establish. Where larger schemes would impact on market uses, the Council will expect the applicant to explain how this contributes to a long-term strategic approach for the market. The Council will seek to ensure that proposals contribute to the positive functions markets can provide. We will also seek a variety of stalls/units to ensure that markets remain genuinely accessible for traders with different levels of experience and resource.

**9.141** The impact of a market on its local community varies according to its scale and appeal as a visitor attraction. Where any major developments are proposed within a market, we will expect the applicant to ensure increased provision of services for the local community, particularly where there is evidence of local residents travelling to other centres to meet basic needs.

**9.142** All markets in Camden appear to be performing a valued function and therefore will be protected unless there is convincing evidence that the market is no longer required.

**9.143** Alongside their benefits, markets can, when poorly designed or managed, cause harm to surrounding areas, for example in terms of congestion on footpaths and roads, litter, refuse storage and noise. Proposals involving the creation or refurbishment of existing markets should therefore include provision for careful management; contribute to environmental and street improvements; and be designed in a way that considers how they will be used by people with disabilities. Provision for the storage of equipment and stock should also be provided in proximity to the site, wherever possible, to reduce the need for vehicular trips.

