

# **Camden Local Plan Proposed Submission Draft 2025**

## **Open Space and Sport Topic Paper**

October 2025

# 1 Introduction

- 1.1 The Camden Local Plan Proposed Submission Draft was published for consultation and engagement from 1 May to 27 June 2025. Following this, the Plan was then submitted to the Planning Inspectorate for examination in public at the start of October 2025.
- 1.2 This topic paper supports Camden Local Plan Proposed Submission Draft Policy SC4 Open Space, Policy SC5 Food growing and Policy SC3 Social and community infrastructure. It provides additional information and justification for the Council's proposed approach for protecting and delivering new and enhanced open space, food growing areas and improvements to play and sports facilities in Camden. This paper explains how we secure additional provision on site or financial payments towards enhancing existing open space and sports facilities within the limitations of the borough's built-up/urban character and given that development sites in the borough are all previously developed.
- 1.3 The Council's approach has been found sound at examinations into previous local plans, and remains appropriate and sound. The Council's planning policies seek to meet needs as far as possible. The draft Local Plan forms part of the Council's wider approach to open space and sports provision which includes area-wide green infrastructure initiatives, estate regeneration schemes, repurposing of highways land, and projects developed by the operators of existing sports/leisure facilities in the borough to address changing needs and priorities.

# 2 Background

- 2.1 As noted in Draft Local Plan Policy SC4 (B), there are 297 designated public and private open spaces in Camden shown on the [Local Plan Policies Map](#) (SD10) and individually listed in the accompanying schedule. This is equivalent to over 5,878,000sqm of open space. Individually, these spaces range in size from 75sqm (Burlington Court Triangle) to 271 hectares (Hampstead Heath). The vast majority of the open spaces have benefitted from decades-long designation across multiple reviews of local planning policies, ensuring their protection. 39 of the open spaces are designated as Sites of Importance for Nature Conservation (SINCs). Many of the borough's larger open spaces are multi-functional and include provision for play and sports. Additionally, the Policies Map identifies a number of 'Local Green Spaces' (all but one of which were identified in a neighbourhood plan), which are to be supported in line with the approach set out in the National Planning Policy Framework.
- 2.2 The borough's urban character means that it is extremely challenging to create new areas of open space, and consequently new outdoor sports facilities. Where the Council has secured new open space through the planning process, in the great majority of cases, this has involved large major

schemes, for example the almost-completed King's Cross Central development (on former railway lands). The development of such major sites will be contingent on balancing a range of different planning considerations, such as optimising different land uses, the provision of housing (in a location with high housing need), and in some cases, re-provision of employment uses and heritage constraints.

- 2.3 For many years, the Council's planning policies have therefore emphasised other ways in which access to green and open space can be achieved, such as the repurposing of highway land to create pocket parks. The most significant example of the latter in recent years has been the delivery of Central London's first new park in over a century at Alfred Place Gardens near Tottenham Court Road, part of a wider set of highways, active travel and public realm works known as 'The West End Project'. Estate regeneration projects in Camden, through the Council's Community Investment Programme (CIP), have also been an important means of improving open space and play provision in the borough. The opportunities and challenges of individual CIP schemes are unique and existing residents will be involved in the development of plans involving open space, play and sports provision.
- 2.4 The Draft Local Plan continues the long-standing and accepted approach that where development will place a significant additional demand on existing open spaces, the applicant should mitigate the impact. Where the Council is satisfied it is not possible for a development scheme to provide open space on-site or off-site, for example through securing access to an existing open space not previously accessible to the public, the Council will seek to negotiate a payment-in-lieu of provision. Given the difficulties of providing new open space in the borough noted above, this approach is taken in most cases.
- 2.5 The level of contributions are subject to negotiation, taking into account the type of development being proposed and its size/likely impact. Schemes below thresholds set out in the Local Plan (in Table 11 in the draft Local Plan) - generally minor and householder schemes - will not be expected to make an open space contribution. Payments received are then allocated to projects in the Council's Greenspaces Investment Programme: a rolling programme of projects to enhance open space and their facilities managed by LB Camden, including play areas and local recreation facilities such as multi-use games areas and tennis courts.
- 2.6 The Council's Leisure Service has responsibility for managing, maintaining and improving Camden-owned open spaces (76 parks and amenity spaces and a further 300 green spaces on housing estates) and are a consultee on any planning application that has the potential capability to provide additional public open space or would impact on existing open spaces nearby. The Service is also a provider, commissioner and promoter of sport and physical activity in Camden with the aim of increasing uptake and sustained participation in physical activity by people of all ages, incomes and backgrounds. The borough's six leisure centres are used by a mix of Camden residents, schools, local clubs and community groups as well as those

working and studying in the borough or those who choose to access Camden facilities from neighbouring boroughs.

- 2.7 Alongside the Council, there is a wide variety of organisations in Camden involved in delivering/enabling sports and physical activity, such as schools, early years providers, sports clubs and the voluntary and community sector (VCS). Funding comes from a variety of sources with the major leisure centres using memberships/admission fees as their main source of income.

### **3 Policy Context**

#### **National context**

##### ***National Planning Policy Framework (NPPF)***

- 3.1 The NPPF states that planning policies and decisions: “should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services...” (paragraph 98).
- 3.2 It also states that planning policies should be based on “robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision” (paragraph 103).
- 3.3 Proposals involving the loss of existing open space, sports and recreational buildings and land are expected to either provide an assessment clearly showing that the open space, buildings/land is surplus to requirements or identify equivalent or better provision in terms of quantity and quality in a suitable location. Where the development is for alternative sports and recreational provision, the benefits of this should clearly outweigh the loss of the current/former use (paragraph 104).

#### **Regional context**

##### ***London Plan 2021***

- 3.4 Chapter 8 of the adopted London Plan addresses ‘Green Infrastructure and the Natural Environment’. Policy G1 states that: “London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced”. Boroughs are expected to prepare green infrastructure strategies to ensure that green infrastructure is optimised and considered in an integrated way. Development plans should use evidence, including green infrastructure strategies, to identify green infrastructure assets, their function and their potential function and identify opportunities for addressing environmental and social challenges through green infrastructure interventions. The Council is currently working to prepare a Green

Infrastructure Strategy in Camden. It is anticipated that a draft will be published in late 2025.

- 3.5 London Plan Policy G3 sets out the approach to protecting 'Metropolitan Open Land' (MOL) and states that any alterations to the boundary of MOL should only be undertaken in "exceptional circumstances when this is fully evidenced and justified". Policy G3 also confirms that it is the role of boroughs to designate MOL on their Policies Map.
- 3.6 Policy G4 on Open Space states that development plans should undertake a needs assessment of all open space to inform policy, identifying areas of open space deficiency. Plans should also promote the creation of new areas of publicly accessible open space, particularly in areas of deficiency, and ensure that open space remains publicly accessible.
- 3.7 Policy G5 on Urban Greening sets out that major developments should contribute to urban greening "as a fundamental element of site and building design" with an interim 'Urban Greening Factor' for the whole of London setting out how much urban greening new developments are required to provide.
- 3.8 Policy G8 on Food growing states that development plans should protect existing allotments and support the provision and identification of land that could be used for food production.
- 3.9 Chapter 5 of the London Plan sets out the need for social infrastructure to be protected and enhanced. Policy S4 on Play and informal recreation states that boroughs should prepare needs assessments and strategies relating to children and young people's play and informal recreation facilities, with residential developments expected to provide at least 10sqm of play space per child.
- 3.10 Policy S5 on Sports and recreation facilities states that boroughs should prepare a needs assessment that considers need at the local and sub-regional level. Sites should be secured for a range of sports and recreation facilities. Boroughs should also maintain, promote and enhance networks for walking and cycling. Part C of the policy reiterates the tests set out in paragraph 104 of the NPPF.

## **4 Local context**

### ***Camden Local Plan 2017***

- 4.1 Policy A2 of the [adopted Camden Local Plan 2017](#) states that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. The policy sets out how the Council will protect open spaces in the borough and sets out how new open space will be

secured. The latter sets a standard of 9sqm per occupant for residential schemes and 0.74sqm for commercial and higher education developments.

- 4.2 Policy A2 is supported by [Camden Planning Guidance on Open Space](#), last updated in January 2021. The guidance sets out further detail on how the Council will establish the type and quantity of open space that should be provided. Worked examples are provided to explain how the amount of open space, and/or a financial contribution-in-lieu will be established.
- 4.3 Policy A2 also applies to outdoor sports facilities. It envisages that existing outdoor sports facilities in the borough will be protected and enhanced. Part (i) of the policy states that the Council will consider development of open space for alternative sports and recreation provision “where the needs outweigh the loss and where this is supported by an up-to-date needs assessment”.
- 4.4 Local Plan 2017 Policy C3 addresses indoor sports facilities. It sets out that facilities will be protected unless there is evidence showing that there is no longer a demand. It also sets out the circumstances in which re-provision would be considered, whilst stating this is likely to be ‘exceptional’ circumstance.

## **5. Evidence**

- 5.1 The Council considers that the evidence prepared for the submission draft version of the Local Plan is appropriate and proportionate in line with paragraph 32 of the National Planning Policy Framework. We also consider it to be relevant and up to date. We have set out below the main sources of evidence that have informed the preparation of the draft Local Plan.

### ***Site allocation capacity studies and previous planning applications***

- 5.2 As set out in the Background section above, larger development sites tend to have the most ability to deliver new open spaces on-site. The Council has undertaken design-led capacity analysis for the Local Plan’s site allocations, which considered whether it is feasible to deliver open space. Where appropriate, site allocation policies in the draft Local Plan identify on which sites new open space is expected. The Council considers that this provides certainty for developers and will help to inform the design and development process for planning applications from an early stage, maximising the opportunity to secure new open space.
- 5.3 The Council has also [adopted planning frameworks/briefs](#), as supplementary planning guidance, for significant areas of development identified in the Local Plan. These frameworks provide further detail on how open space might be delivered in these areas. Given the highly constrained nature of the borough, the Council has considered it has gone as far as possible in identifying sites / potential locations where new open space, which could include sports facilities such as Multi Use Games Areas (MUGAs) and tennis courts, could be delivered.

- 5.4 While larger sites have the most scope for delivering open space, especially those performing a range of different functions, the Council will seek provision on-site for any scheme subject to the thresholds and types of development set out in Proposed Submission Draft Local Plan Table 11 – Open Space Standards. The opportunity to deliver open space will vary across sites subject to a range of factors, including the extent to which the site is already developed at ground level. Monitoring data shows that since the Local Plan was adopted in 2017, it has been possible to provide open space on sites of varying sizes. A list of the new open spaces that have been delivered is set out in Appendix 1 of this Topic Paper. In determining what types of open space a site might provide, the Council will take into account factors such as the likely ‘child yield’ (that is, the number of children expected to be living within a development) and existing open space provision nearby. Detailed design work undertaken at the planning application stage, including the layout of different land uses, will ultimately identify a site’s potential for incorporating new open space. The Council will consider documents submitted with planning applications, such as the ‘Design and Access Statement’ and landscaping plans, in determining whether on-site provision is required.

***Camden Infrastructure Delivery Plan (IDP), October 2025***

- 5.5 The Council has prepared an [Infrastructure Delivery Plan \(IDP\)](#) (EB43), which takes a topic-based approach setting out how different types of infrastructure will be delivered and identifies both planned/‘committed’ infrastructure and potential future needs. The IDP is also intended to provide further detail regarding the infrastructure needed to support the Council’s strategies and policies for the Local Plan sub-areas (South, Central, West and North Camden). It has been developed with input from Council services and incorporates comments made by relevant external bodies during the Local Plan consultation process.
- 5.6 The IDP incorporates sections on ‘Green Infrastructure’ and ‘Sports and Physical Activity’. It acknowledges the critical role of the Council’s ‘Green Spaces Investment Programme’ in identifying and progressing projects to improve parks in the borough and amenity space on housing estates. Part of the Green Spaces Investment Programme has involved the delivery of ‘mitigations’ to offset the impact of the emerging High Speed Two construction programme in the Euston area as well as the greening of highways land working with Council Highways colleagues. In selecting projects, the Council is able to draw upon data and knowledge from multiple sources including its role as manager of many open spaces and regular engagement with local groups and community organisations, such as the Friends of Parks groups. The Council also shares, and contributes funding towards, the maintenance of greenspace datasets managed by [Greenspace Information for Greater London \(GIGL\)](#), the London Environment Records Centre. This includes information about the availability of different types of open space and the location of deficiency areas (i.e. where residents have more limited access to open space).

- 5.7 The Council also has access to comprehensive information relating to the provision of, and access to, a wide range of different sports facilities. The Council is a member of Pro-Active Camden – a strategic partnership for the development and co-ordination of Camden's sport and physical activity sector. All principal sports and their associated facilities are shown in the [‘Activity and Sport facility finders’](#), a publicly available resource on the Council's website.
- 5.8 A significant consideration for the Council is how participation rates in physical activity vary across different population groups, with significantly lower rates in some areas of multiple deprivation. The IDP identifies the different ways in which the Council is working with partners to improve access to, and reduce barriers to participation in sports and physical activity. This places particular emphasis on increasing informal, ‘doorstep’ provision and, where appropriate, targeted interventions for population groups where participation is recognised to be lower. It involves delivering activities in places where residents already go such as parks and schools, and does not necessarily require the provision of new physical infrastructure or even buildings for their delivery.
- 5.9 The Council intends to undertake annual reviews of the IDP to ensure that an up-to-date picture of infrastructure delivery is maintained across the various topic areas.

#### ***Local Plan Viability Study 2025***

- 5.10 The Camden Local Plan Viability Study considers whether the cost of complying with the Local Plan's Proposed Submission Draft policies would significantly impact on the delivery of development. The cost of the site-specific mitigation for various development typologies has been tested, including the need to provide open space or a payment-in-lieu. The Study demonstrates that an open space contribution is unlikely to be a barrier to development coming forward in the borough. We therefore consider the approach to be justified and deliverable. As highlighted above, the existing approach has been in place for a number of years and the Council has not found that contributions for open space have caused practical or viability issues for delivering development. While some responses to consultation on the Local Plan commented on the overall level of planning obligations, no respondents raised specific concerns about the approach to open space. The application of various policy requirements, having regard to the specific scheme and any particular site circumstances, is considered at the planning application stage and appropriate flexibility applied.
- 5.11 The Council also ensures that any planning obligations secured relating to open space meet the statutory tests set on in paragraph 58 of the National Planning Policy Framework.
- 5.12 The Viability Study factored in the requirements of the Community Infrastructure Levy (CIL). The Council has used the strategic element of CIL to help deliver certain area-based projects, including highways and public realm works, which include elements of open space and sports provision.



There is also a well-established ward-based, member-led system for prioritising projects to be funded through the local proportion of CIL. Examples of local CIL projects have included improvements to amenity areas, the refurbishment of sports/leisure facilities managed by VCS organisations and a wide range of greening initiatives, and are set out in Appendix 4 below. Having tested a variety of typologies as well as requirements pertaining to strategic sites, the Council is satisfied that open space contributions do not have a significant bearing on viability.

### ***Open space and recreation needs***

- 5.13 The Council undertook a comprehensive [Open Space and Recreation Study](#) in 2014 (EB29 and EB30) prepared by Atkins consultants to inform the Local Plan 2017. As part of the current Local Plan review, it was not considered necessary or proportionate to commission an update to the existing study as we have up to date information/evidence on where there have been gains and losses and improvements since then which strongly suggests that there has been a limited change in circumstances and that the 2014 Study's findings remain relevant.
- 5.14 The Council monitors changes in the supply of open space as Appendix 1 shows. The population of Camden has remained static since 2017 and only modest growth is forecast. The latest [GLA population projections](#) show that the borough's population was 216,250 in 2017; 216,850 in 2023 and projected to be 222,900 in 2030.
- 5.15 The Atkins Study found that there was less formal provision of open space in the predominantly residential areas to the North and West of the borough (specifically Fortune Green, Frognal and South Hampstead) and that there were also particular deficiencies in access to, and intensive use of, open spaces in the south of the borough.
- 5.16 Almost all development that has come forward in the North and West of the borough since the Local Plan 2017 was adopted has not been at a scale that triggers the open space policy requirement, or involved constrained sites unable to deliver new open space. (A notable exception is the planning consent granted in 2023 for the O2 Centre, car park and car showrooms which has potential to deliver a significant quantum of new open space). The south of the borough has seen the delivery of new open spaces with the majority in the King's Cross Central scheme. The substantial challenges of alleviating pressure on existing open spaces in parts of the borough are likely to persist regardless of local plan policies simply because new open space cannot be created at ground level except in exceptional circumstances.
- 5.17 The same challenges that limit the ability to deliver new open spaces in Camden also apply to delivering outdoor sports facilities. Since 2017, one new leisure centre has opened - within the [King's Cross Central development](#). As has been widely documented elsewhere, the pandemic and cost-of-living crisis have had a major bearing on the financial sustainability of indoor sports

facilities, especially pools due to increased energy bills. A particular focus has therefore been on supporting the 'recovery' of these facilities, particularly memberships which have also been affected by the shift towards hybrid working. Except for in the Euston area, which is subject to the separate Euston Area Plan, there is not considered to be the opportunity to provide major new sports facilities on any of the sites allocated in the Local Plan. The larger sites, primarily in Kentish Town and Camley Street, are in areas which are already well-served by sports facilities. As mentioned in the IDP, the Council retains an ambition to improve the sports facilities at the Oasis Leisure Centre in the south of the borough. This is linked to the delivery of a wider scheme involving the building in which the existing leisure centre is situated.

- 5.18 Sport England representation on the Regulation 19 draft Local Plan refer to a need for an up-to-date playing pitch strategy. The Local Plan's site areas and sub area policies (S1, C1, W1 and N1) have already identified the best opportunities for delivering new open space. Further detailed design and development work will be required to understand to what extent these spaces can support formal/informal outdoor leisure provision and what type. In a borough with such limited land availability, increasing access to sports and physical activity depends, to a considerable extent, upon optimising the use of existing facilities, including 'shared use' agreements with landowners such as schools, which the draft Local Plan supports (at paragraph 10.51). This potentially includes the repurposing of existing amenity areas within housing estates, for example where there are LB Camden Community Investment Programme (CIP) projects. Commissioning evidence such as a Playing Pitch Strategy would only serve to re-confirm what is already known about the supply of sports facilities in Camden and the limitations of providing new ones. Representations made during the preparation of the current Local Plan at the time also stated that the Council should have prepared a comprehensive sports needs assessment. However, the Inspector noted in her report: *"this is not a critical issue given the built-up nature of the borough and the limited prospects for the provision of additional pitches"*.
- 5.19 Which sports are supported and how physical activities are delivered are matters which are largely outside of the Local Plan process (and in some cases no planning application will be required), and will 'shaped' in line with consultation with existing users of facilities and local residents. As stated earlier, the Council's Leisure Service, through working with relevant partners, has a comprehensive understanding of where needs in the borough exist and this information is used to inform refurbishment/enhancement proposals involving existing provision. A playing pitch strategy would only be able to provide a 'snapshot' in time and is highly likely to identify a level of need which the borough is not realistically able to meet over the plan period. As is the case with the Council's open space study more generally, the Council considers it would be disproportionate and of limited benefit to commission a playing pitch strategy when there have been limited change in the supply of

open space and population since the last Local Plan was adopted, and this is unlikely to materially alter.

- 5.20 As stated in paragraph 5.17 above, the scale of development envisaged in the Euston area is likely to trigger a need for new open space and sports facilities, including the need to compensate for losses of open space arising from the construction of High Speed Two. This development will be guided by the Euston Area Plan, including its own evidence base on matters including open space and infrastructure, which will explore the feasibility of provision in this location. The delivery of development at Euston is likely to begin to come forward towards the end of the Local Plan period, and is projected to extend well beyond this date. Despite the delay and uncertainty associated with the HS2 project, the Council has undertaken a [sports needs assessment for the Euston Area Plan](#) 2022 (EB32): while this necessarily focusses on what might be needed to support the additional population at Euston, the study provides a recent assessment of capacity across different types of sports facilities and is borough-wide in scope. This work confirms that formal provision has not significantly changed since the 2014 Atkins study was undertaken.
- 5.21 For the reasons set out above, the Council does not consider it is necessary nor proportionate to commission a new open space and recreation strategy as the overall findings of existing evidence in terms of need for, and provision of, open space and formal sports facilities will not have fundamentally changed and therefore remain relevant. The scope for providing new areas of open space and sports facilities in the borough continues to be extremely limited. We have taken a proportionate approach by focussing the commissioning of new evidence where it is likely to have greatest value, i.e. in the area covered by the Euston Area Plan.
- 5.22 In addition, the Council has established monitoring procedures (such as the publication of the [Authority Monitoring Report](#)) to identify where changes in open space provision occur, and it also contributes to updates of data held by [Greenspaces for Greater London \(GiGL\)](#). This includes information on the supply of different types of open space and where there are 'deficiency areas'.
- 5.23 As this Paper has set out, the Council has established processes for ensuring that where new open space is delivered it is effective in meeting local needs and via the Green Spaces Investment Programme ensures that the impact of many other larger schemes are addressed through projects to refurbish and upgrade existing public open spaces.

## **6 Local Plan approach**

- 6.1 As set out above, the Proposed Submission Draft Local Plan largely maintains the approach set out in the adopted Camden Local Plan, which was previously found sound at examination. This has been successful in securing open spaces on 15 schemes, amounting to around 30,000sqm/3ha of

additional open space (if all of the schemes are implemented). The majority of this open space is in connection with one site – the O2 Centre, car park, car showroom sites and 14 Blackburn Road (Draft Local Plan Site Allocation W2). We have received over £4.5million in financial payments during the period 2018/19 to 2024/25 (equivalent to around £650,000 per annum). Also, over £2.5million from the local proportion of the Community Infrastructure Levy was invested in a variety of open space and sports-related projects. Please see Appendix 4. A [new sports hall](#) constructed at King's Cross is the most significant example of new sports provision which has been secured as part of the planning benefits of a major scheme, although permission for it pre-dated the current Local Plan.

- 6.2 Draft policy SC4 introduces an additional section (part D) which sets out the Council's expectations around the design and management of open space. The existing Local Plan does include reference to management plans but this is principally in the context of conservation areas, heritage assets and major open spaces owned by third parties. The management and maintenance of open / green areas is often cited as an important concern for residents in planning consultations, and the Council considers that the new part D will help to ensure that all open spaces are effectively managed.
- 6.3 To reduce the length and complexity of the policy, we have also removed some matters that are already addressed elsewhere, such as protection of residential gardens (covered by Policies NE1, D3 and D5) and the safeguarding of Metropolitan Open Land, which is also addressed by Policy NE1 and policy G3 of the London Plan. The Council has designated MOL on the Local Plan Policies Map in accordance with the London Plan.
- 6.4 Draft Policy SC4 is intended to provide equivalent protections for outdoor sports facilities as Local Plan 2017 policy A2 already provides (with outdoor sports facilities identified as a type of open space in paragraph 10.65 of the Proposed Submission Draft). Draft Policy SC3 deals with indoor sports provision. Although this policy addresses a broader range of social infrastructure than Policy C3 in the adopted Local Plan, we consider it provides similar strong protections for such facilities. A separate policy SC5 on Food growing has been introduced into the new Local Plan, recognising the increasing demand and importance attached to local food growing.
- 6.5 Draft Local Plan Policy SC4 retains the open space standards that have been found sound at number of previous examinations (that is, examinations of the Replacement Unitary Development Plan in 2005, Camden Development Policies in 2010, and the current Local Plan in 2017). The Council's supplementary planning document [Camden Planning Guidance on Open Space](#) sets out in more detail how the amount of open space expected from a particular scheme is calculated, based on the standards in the Local Plan.
- 6.6 Applying these open space standards (set out in Table 11 of the Proposed Submission Draft Local Plan), has ensured that the Council's open space requirements have been applied consistently over time and that levels of open

space per person in the borough are maintained as far as possible. The additional burden of occupants of major schemes on the supply of open space will therefore be mitigated as far as possible. The likely number of additional occupants of a development scheme determines what is required in terms of sqm of open space or a financial contribution in lieu of provision. Minor development and householder schemes are excluded.

- 6.7 The approach has been effective with a rolling programme of projects prioritised through the Green Spaces Investment Programme, with Section 106 obligations being the predominant funding source, see Appendices 2 and 3. The spending of funds collected through the Community Infrastructure Levy (CIL) can also deliver positive outcomes for open space and sports provision. This includes funding for area-wide transport and public realm initiatives as well as smaller-scale 'neighbourhood' projects identified through a ward Member-led spending system with funding provided through the local proportion of CIL. Local CIL has helped to deliver multiple projects in voluntary sector premises, see Appendix 4. This illustrates how planning policy is one element of the Council's approach to open space and that improvements are also secured through other funding mechanisms.
- 6.8 Sport England in their representation to the Regulation 19 plan commented that "a standards approach has its limitations in sports facility planning as it does not reflect local need for a specific area and could result in facilities that are not suitable to meet local needs". They also questioned whether the standards approach would be sufficient to meet the local sporting need arising from a development. The standards (including 9sqm per resident and 0.74sqm per worker) are based on the overall supply of open space in the borough. Application of these standards via the formula set out in [Camden Planning Guidance on Open Space](#) is intended to ensure that this level of provision is maintained as far as possible. It is acknowledged that in parts of the borough there are deficiencies in access to public open space; however, increasing the standards is likely in practice to result in even fewer schemes delivering open space on-site and therefore less open space being delivered. Reducing the standards could potentially mean that more sites are able to deliver open space; however, as stated, the presumption for space to be delivered on-site is applied to all major applications so the Council will seek open space where it is most feasible to do so. In an urban area such as Camden, usage of most open spaces and sports facilities tends to be high. The Council's Leisure Service regularly undertakes 'customer' surveys and invites feedback from users. Greenspace investment priorities and spending of Section 106 and CIL are all subject to appropriate levels of Member scrutiny to ensure that developer contributions are well spent. Ward members tend to be involved, often as promoters for local initiatives.
- 6.9 Since the Council introduced its local open space standards, the Mayor of London added a requirement in Policy S4 of the London Plan 2021 that at least 10sqm play space standard per child for residential schemes should be delivered. Whilst noting that this is a pan-London requirement, the Council

has had mixed success in securing this quantum of play space. As it has been long-standing practice in Camden to secure play space enhancements as part of the overall open space contribution (and individual play projects form part of the Greenspaces Investment Programme described above), the Council has set out in the [Camden Planning Guidance on Open Space](#) how the London Plan and Local Plan requirements for play and open space should be considered (paragraph 1.35). Since London Plan Policy S4 forms part of Camden's development plan, the Council's starting point will be the 10sqm standard; however, where there is evidence that this is difficult to achieve, we consider that the wording in the CPG provides useful flexibility.

- 6.10 The draft Local Plan also introduces a separate Policy SC5 on Food growing. This recognises growing interest in the provenance of food and that access to healthier food options is an important means of tackling health inequalities. Improving food growing opportunities is integral to the Council's food mission (set out in [We Make Camden](#), the Council's Corporate Strategy). Growing food is also widely understood to benefit wellbeing.
- 6.11 Policy SC5 is intended to support greater use of open space and communal/public areas for food growing. As well as through allotments and gardens, this may also potentially be facilitated through using roofs, walls and balconies, including in commercial developments. It is anticipated that any contributions towards food growing areas would form part of the overall open space standards set out in Table 11 of the draft Local Plan.
- 6.12 Sport England have queried what protection would exist for any "non-allocated facilities" not covered by designations on the [draft Local Plan Policies Map](#) (SD10). Outdoor sport and recreation facilities in the borough tend to exist, though not exclusively, on larger areas of open space. As the Policies Map has been updated across multiple development plan reviews, and with input from the Council's Leisure service, we consider that all outdoor sport and recreation facilities are already identified. Where there are areas of non-designated space within a development site's boundary (i.e. where there might be future potential for it to provide public access), it is likely that other Local Plan policies for protecting gardens and heritage assets will ensure such land is appropriately preserved. Further, 'Local Green Space' designation via Neighbourhood Plans, of which there are seven adopted in Camden, has provided an opportunity for local communities to designate often quite small spaces of particular local value and importance.
- 6.13 The Council in reviewing the Policies Map have identified 12 new public open spaces which have been delivered since the last Local Plan was adopted. These are open spaces that have been delivered through major development schemes, area wide regeneration schemes such as The West End Project and or CIP projects, e.g. Central Somers Town and Agar Grove. No representations received during the preparation of the draft Local Plan have requested additional spaces to be designated (and no additional sites were suggested by the Council's Leisure Service).



- 6.14 As set out in the Council's [Schedules of Proposed Minor and Major Modifications](#) (SD50 and SD51) the Council has proposed a modification to the text of Policy SC3 on Social and community infrastructure to clarify that the policy addresses indoor sports facilities. The proposed modification would not materially alter the policy or how it will be applied.

## **7 Conclusion**

- 7.1 There is an established approach in the borough for mitigating the impact of development on existing open spaces and sports facilities which is continued in the submitted draft Local Plan. This has been working well over many years and has contributed to enhanced open space and facilities where they are most needed, and in accordance with the statutory tests for seeking planning obligations.
- 7.2 As this paper has set out, Camden is an inner London borough where most development sites are already built upon. Therefore, the draft policy combines strong protections for existing open space and sport facilities whilst identifying where there are the most realistic opportunities for delivering new provision (i.e. site allocations, Community Investment Programme projects etc.), including new green infrastructure.
- 7.3 The Council has a pipeline of planned open space and sports improvement projects based on a thorough understanding of needs in the borough from partnership working, input and scrutiny from Members and consultation and engagement with local residents' and other stakeholders. Much, though not all, of these projects will be funded through the planning process, particularly from Section 106 payments-in-lieu. We consider everything that is reasonably possible through the Local Plan to support new provision, especially in areas of the borough in greatest need. The Council does not consider that undertaking further open space or playing pitch needs assessments would be proportionate or beneficial as such studies would repeat the findings of previous work undertaken for the adopted Local Plan and would not materially alter the situation where land availability is scarce, there has been limited change in the supply of sites since 2017 and over the same period, population change has been static and population growth is forecast to remain relatively modest.
- 7.4 The Council will continue to monitor open space changes and officers from the Leisure Service will be involved in the development and review of relevant planning proposals to ensure that the best outcomes for Camden residents are delivered. These officers have actively participated in the development of the draft Local Plan. As set out in this paper, future needs and demands for services will not only be addressed through new physical infrastructure but also through better use/optimisation of existing facilities and through decisions outside of planning, for example using an existing open space or sports facility in a different way.

- 7.5 For the reasons set out above, the Council considers that the local plan open space approach is positively prepared, based on appropriate evidence, effective, consistent with national and regional planning policy and therefore sound.



**Appendix 1: Permitted schemes providing open space on-site (July 2017 to July 2025)**

| Name of site   | Ward                       | Net gain (approx.) | Notes   |
|--|----------------------------|--------------------|---|
| Central Somers Town CIP  | St Pancras and Somers Town | 80sqm              | Reconfiguration and refurbishment of open spaces including Polygon Road open space and repurposing/greening of highway land |
| Middlesex Hospital Annex   | Bloomsbury                 | 700sqm             | Includes reinstatement of historic Bedford Passage  |
| Castlewood House and Medius House  | Holborn and Covent Garden  | 150sqm             | Small open space on Castlewood House site   |
| Land north of Kidderpore Avenue (former King's College Hampstead campus) | Frognal                    | -900sqm (SINC)     | Council secured a package of mitigation measures to ensure the site would retain its biodiversity value                     |
| Morrisons Supermarket and Petrol Filling Station (Camden Goods Yard)     | Camden Town                | 5,000sqm           | Includes amenity space, wildflower planting, play facilities and community food growing provision                           |
| Former Central St Martins Campus – Southampton Row and Red Lion Square   | Holborn and Covent Garden  | 548sqm             | New courtyard and route (Orange Street)   |
| Eastman Dental Hospital, 256 Gray's Inn Road                             | King's Cross               | 840sqm             | New public square   |
| St Pancras Commercial Centre   | St Pancras and Somers Town | 660sqm             | Amenity space   |
| 'Ugly Brown Building', 2 St Pancras Way                                  | St Pancras and Somers Town | 1,700sqm           | Amenity space, natural greenspace and play facilities   |
| Land to the North of the British Library                                 | St Pancras and Somers Town | 4,750sqm (gross)   | Mix of hard and soft landscaping at ground level  |
| The 02 Masterplan site   | West Hampstead             | 16,500sqm          | Proposals include a linear park along the southern edge of the site, two green open spaces and a town square                |
| Selkirk House, 166 High Holborn  | Holborn and Covent Garden  | 350sqm             | Courtyard and new public street   |
| 330 Gray's Inn Road  | King's Cross               | 473sqm             | Public courtyard  |
| Euston Tower, 286 Euston Road  | Regent's Park              | 394sqm             | Amenity space   |
| 125 Shaftesbury Avenue   | Holborn and Covent Garden  | 211sqm             | Includes new passageway   |

Appendix 2: Financial contributions secured for open space in Section 106 agreements

| Year    | Total Section 106 payments received |
|---------|-------------------------------------|
| 2018/19 | £446,000                            |
| 2019/20 | £842,000                            |
| 2020/21 | £260,000                            |
| 2021/22 | £376,891                            |
| 2022/23 | £823,321                            |
| 2023/24 | £816,774                            |
| 2024/25 | £998,589                            |

**Appendix 3: Open spaces that have benefitted from S106 funding through the Green Spaces Investment Programme**

| Name                                  | Ward                       |
|---------------------------------------|----------------------------|
| St Pancras Gardens                    | St Pancras and Somers Town |
| Bramber Green                         | King's Cross               |
| Wicklow Street Open Space             | King's Cross               |
| Iverson Road Open Space               | West Hampstead             |
| Sumatra Road Play area                | West Hampstead             |
| Alfred Place Gardens                  | Bloomsbury                 |
| College Gardens                       | Kentish Town South         |
| Broadhurst Gardens – community garden | South Hampstead            |
| Alf Barrett playground                | Holborn and Covent Garden  |
| Swiss Cottage open space              | Primrose Hill              |
| Antrim Gardens                        | Belsize                    |
| Harrington Square Gardens             | Regent's Park              |
| Oakley Square Gardens                 | Regent's Park              |
| Waterlow Park play area               | Highgate                   |
| Fleet Valley Pocket Park              | Holborn and Covent Garden  |
| Purchese Street Open Space            | St Pancras and Somers Town |
| Polygon Road Open Space               | St Pancras and Somers Town |
| Camelot House amenity space           | Camden Square              |
| Lincoln's Inn Fields                  | Holborn and Covent Garden  |
| Russell Square                        | Bloomsbury                 |
| Maygrove Peace Park                   | Fortune Green              |
| Cumberland Market                     | Regent's Park              |
| Cantelowes Gardens                    | Kentish Town South         |

**Appendix 4: Open space, play and sports projects allocated funds from the local proportion of the Community Infrastructure Levy (CIL)**

| <b>Name/Description</b>  | <b>Ward</b>  |
|--|--|
| Oriel Place improvements   | Hampstead  |
| Camden Highline (feasibility)  | Various  |
| Talacre Picnic Benches and Talacre Playcentre Outdoor Space refurbishments       | Haverstock   |
| Kentish Town planting  | Various locations in Kentish Town North and South      |
| Webheath Garden, Webheath Estate   | Kilburn  |
| NW5 Community Play Project   | Kentish Town South                                     |
| Kilburn Park Adventure Play  | Kilburn  |
| Phoenix Garden – Partnership, capacity building, operational costs               | Holborn and Covent Garden                              |
| Swiss Cottage Green Infrastructure Audit and Vision                              | Various  |
| Cantelowes SkatePark   | Kentish Town South                                     |
| Pangbourne Allotments, William Road  | Regent's Park  |
| Clarence Way MUGA Roof Netting Installation                                      | Camden Town  |
| Shinbudo London Infrastructure and Equipment                                     | Kilburn  |
| Pirate Castle improvements, roof and renovation works                            | Camden Town  |
| GOAL Sports at The Dome, Weedington Road   | Gospel Oak   |
| Marchmont Community Garden   | Bloomsbury   |
| Brunswick Square Planting  | King's Cross   |
| Queen Square History Board   | Holborn and Covent Garden                              |
| Three Point Park MUGA Play refurbishment   | Highgate   |
| Somers Town Global Generation Community Gardener, Story Garden, Ossulston Street | St Pancras and Somers Town                             |
| Camden Swiss Cottage Swimming Club Equipment, Swiss Cottage Leisure Centre       | South Hampstead  |
| Swiss Cottage Leisure Centre Outdoor Exercise Equipment                          | South Hampstead  |
| Mortimer Terrace Nature Reserve Community Purchase                               | Gospel Oak   |
| Great Croft Community Garden, Resource Centre, Cromer Street                     | King's Cross   |
| Coram's Fields Play Tower and Lighting Improvements                              | King's Cross   |
| Camden United FC Director of Young People  | Various locations including St Pancras and Somers Town |
| Somers Town Community Gardening 2023   | St Pancras and Somers Town                             |
| Branch Hill Pond Restoration   | Frognal  |
| Camden Youth Football League Running Costs – Coram's Fields and Castlehaven      | King's Cross and Camden Town                           |
| Somers Town Community Sports Hall Repainting                                     | St Pancras and Somers Town                             |
| Kingsland Estate Greening Project  | Primrose Hill  |
| Badminton for All Haverstock, Haverstock School                                  | Haverstock   |
| Youth Health and Wellbeing Programme, Bourne Estate TRA                          | Holborn and Covent Garden                              |

| Name/Description   | Ward                       |
|--|----------------------------|
| Crabtree Fields improvements                                     | Bloomsbury                 |
| Calthorpe Community Garden and Festival (The Black Mary Project) | King's Cross               |
| Somers Town Community Gardener 2024 25                           | St Pancras and Somers Town |
| Camden Square Play Centre Investment, Murray Street              | Camden Square              |
| Antrim Gardens Green Space Improvements                          | Belsize                    |
| Ingestre Woods Restoration Project                               | Kentish Town North         |
| Kilburn Grange Park Toilets                                      | Kilburn                    |
| Polygon Road Open Space improvements                             | St Pancras and Somers Town |
| Coram's Fields Junior Play Zone redevelopment                    | King's Cross               |
| Ingestre Road Children's Park fencing                            | Kentish Town North         |
| Oakley Square Gardens Green Space Improvements                   | Regent's Park              |
| Plot 10 Community Play Project investment                        | St Pancras and Somers Town |
| Haverstock Community Health and Wellbeing Programme              | Haverstock                 |