

# Camley Street Neighbourhood Development Plan (2019 - 2034)

## Consultation Statement



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# 1 Introduction

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## Introduction

1.1 The Localism Act 2011 introduced new rights to allow communities to produce Neighbourhood Development Plans. The Camley Street Neighbourhood Forum (CSNF) was designated in February 2014 by the London Borough of Camden to take forward the production of a Neighbourhood Development Plan for the area. The CSNF area was re-designated in May 2019.

1.2 The Forum's objective is to make the neighbourhood: *"an area that's economically vibrant, socially connected and secure the greenest, safest place to live and work it possibly can be."*

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## The Camley Street Neighbourhood Forum (CSNF)

1.3 In pursuit of this objective, the Forum has sought the views of residents and businesses and, informed by the responses, has developed the Camley Street Neighbourhood Development Plan (CSNDP).

1.4 The CSNDP sets out a vision and associated policies that are intended to help shape and guide the future development of the area.

1.5 The Forum recognises that the Camley Street area, due to its proximity to King's Cross, is likely to experience future development pressure. Given this, the Forum wants to ensure that the opportunities and potential benefits that new development could bring are directed towards the residents and businesses who already live and work in the area and any adverse impacts associated with an increase in intensity of development are avoided.

1.6 In addition, the Forum wants to ensure that:

- the existing light industrial business community is retained;
- its activities are successfully integrated into new mixed-use buildings; and
- operational requirements of existing businesses are accommodated in any future re-planning of the area.

1.7 The CSNF includes representatives of some of the businesses on the industrial estate and residents. The Forum meets on a regular basis to discuss key issues relating to the Neighbourhood Development Plan, running of the Forum and key consultation and engagement events.

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## Purpose of the Consultation statement

1.8 This Consultation Statement is required as part of the submission of the Neighbourhood Development Plan to the London Borough of Camden to begin the formal process of examination. In accordance with the Regulations, this Consultation Statement:

- a) provides details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) explains how they were consulted;
- c) summarises the main issues and concerns raised by the persons consulted; and
- d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

## 2 Timeline of key events

2.1 The development of the Camley Street Neighbourhood Plan has taken place over a period of more than six years. The table below sets out the key stages in the Plan's development, providing a timeline of key consultation events. The key stages comprise:

- the **initial area designation**, where a number of awareness-raising events were held prior to formal consultation on the area designation;
- the **evidence base consultation** which investigated local peoples' hopes and aspirations for the future of the area, as well as identifying the problems that the Neighbourhood Plan could potentially address;
- consultation with LBC as part of the producing **the Draft Neighbourhood Plan**;
- **informal consultation** on the Draft Neighbourhood Plan; and
- the statutory **Regulation 14 Consultation** on the Draft Neighbourhood Plan required by the Regulations.

Date	Event
<b>INITIAL AREA DESIGNATION</b>	
<b>Autumn 2012</b>	A small group of business representatives met to discuss the potential for Neighbourhood Planning in the Camley Street area, and the potential for joining with a wider King's Cross Neighbourhood Forum. It was decided that the King's Cross Area was large, diverse and undergoing significant change. The issues at Camley Street were likely to get 'lost'. At a meeting on 11/12/2012 this small group agreed to try to form a Camley Street Neighbourhood Forum, and a series of awareness raising events were held.
<b>Nov 2012</b>	Neighbourhood Party
<b>17/12/2012</b>	Christmas Carol concert
<b>22/02/2013</b>	Wassailing party - Residents and business invited and about 100 attend. Informal discussion regarding setting up the Camley St Neighbourhood Forum with general agreement to proceed.
<b>26/04/2013</b>	First meeting with Camden planning officers to discuss the potential for a CSNF
<b>02/06/2013</b>	The Big Lunch
<b>18/07/2013</b>	Constitution of the Camley Street Neighbourhood Forum established
<b>12/10/2013</b>	Area Application for Boundary of the 'Camley Street Neighbourhood Forum Area' submitted
<b>31/10/2013</b>	Consultation on the Forum and area designation starts
<b>20/09/2013</b>	Harvest Festival - Residents and business invited about 150 attend. Further discussions regarding the new Forum including agreeing the boundary line with especial reference to the St Pancras churchyard.
<b>13/12/2013</b>	Consultation on the Forum and area designation finishes
<b>21/02/2014</b>	Area and forum designated

Date	Event
<b>EVIDENCE BASE CONSULTATION</b>	
16/06/2015	Camley Street Neighbourhood Forum AGM. Key topics from Evidence Base survey discussed and agreed
31/07/2015	First drop-in for locals regarding new neighbourhood plan
01/08/2015	Second drop-in for locals regarding new neighbourhood plan
01/12/2015	Camley Street Neighbourhood Plan Evidence Base Document published
<b>PRODUCING THE DRAFT NEIGHBOURHOOD PLAN</b>	
22/03/2016	Initial draft neighbourhood plan sent to London Borough of Camden (LBC) for comment
15/04/2016	Comments received from LBC
March 2016 - May 2017	Draft Neighbourhood Plan revised to respond to LBC
18/05/2017	CSNF AGM - final draft of NP now ready and published on website
<b>INFORMAL CONSULTATION</b>	
29/09/2017	Camley Street Harvest Party
26/01/2018	Camley Street Futures - an open discussion event. Viewpoints from residents, business owners, architects from KCA
28/09/2018	Camley Street - Harvest Festival Party
<b>REGULATION 14 CONSULTATION</b>	
28/11/2018	Regulation 14 Consultation begins
28/11/2018	First staffed event in the Camden Library 4-7pm
11/12/2018	Second staffed event at Camden library 5pm-8pm
05/01/2019	Third staffed exhibition at Camden Library 11-2pm
13/01/2019	Fourth staffed event at the Camden Garden centre
13/01/2019	Statutory Consultation ends
Jan - May 2019	Final revisions to Neighbourhood Plan and preparation of supporting material for submission to LBC

## 3 Area designation 2014 and re-designation 2019

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### Area designation 2014

3.1 In 2013, the Camley Street Neighbourhood Forum (CSNF) undertook the required steps to designate the area. During this process engagement activities were undertaken with the local community and it is set out below.

3.2 Engagement activities were targeted at the individuals who live and work in the Forum Area and the businesses and community organisations that represent them.

3.3 During 2012 and 2013 a number of events were held to increase the visibility of the Forum and membership amongst residents and businesses within the Forum Area including:

- November 2012 – Invited all residents and business to a ‘neighbourhood party’ to hear about the proposed Neighbourhood Forum and to help set it up.
- December 2012 – A Christmas Carol event
- February 2013 – A Wassailing party
- June 2013 – A ‘big lunch’ event
- September 2013 – A ‘harvest festival’

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#### Who was consulted at the above events?

3.4 Residents and businesses were invited along to the above events.

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#### How were they consulted?

3.5 The events were informal and allowed for conversations about the intention of the CSNF and for explanations as to how they could be involved going forward.

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#### What were the issues raised and how were these issues addressed?

3.6 The outputs of these events helped to expand the membership of the Forum and increased knowledge of the formation of the NP area. The events also gave a general consensus to take the plan forward.

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### Statutory consultation

3.7 Public consultation was conducted by the London Borough of Camden on the Forum and Area applications. This took place between 31st October and 13th December 2013. The Council consulted residents and other interested stakeholders on this application.

3.8 On 21 February 2014 London Borough of Camden approved the designation of the Neighbourhood Area and Neighbourhood Forum.

3.9 This consultation received 44 responses – 42 in support and 2 objections, which were minor boundary issues.

3.10 The area designations can be found as appendices at the end of this document.

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### Re-designation of the area 2019

3.11 The CSNF applied to the Council to be formally re-designated as a neighbourhood forum, in accordance with the Town and Country Planning Act (1990) and neighbourhood planning regulations. The Forum was established in 2014 and after five years in operation reapplied to continue to be formally designated for a further five years.

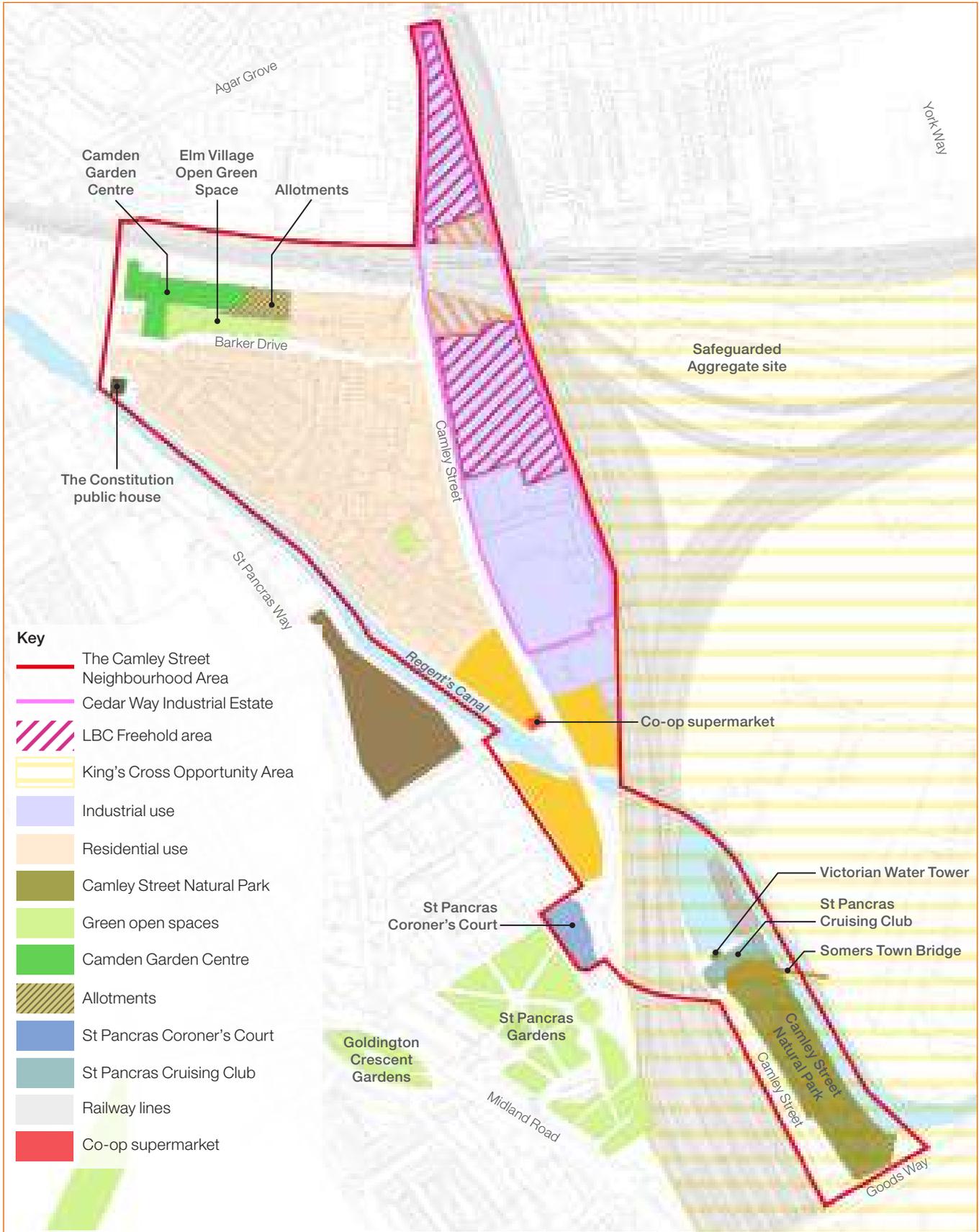
3.12 The Council consulted residents and other interested stakeholders on this application. The closing date for comments was the 4th April 2019.

3.13 There were 30 responses including 3 petitions to the CSNF. The area was re-designated on the 10th May 2019.

# The Camley Street Neighbourhood area

The Neighbourhood Plan Area was formally designated by LB Camden in 2013 and reconfirmed in 2019.

The extent of the Plan area is shown below.



St Pancras International Station and King's Cross Station ↓

The Camley Street Neighbourhood Area, the area has remained unchanged between 2013 and 2019 designation

# 4 Evidence Base Consultation 2015

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## Introduction

4.1 The purpose of this consultation stage was to help the Forum understand the issues that were of interest and concern to local people and businesses, so that the Neighbourhood Plan could be shaped to address these issues.

4.2 The work was undertaken by Plan Projects, and resulted in a very detailed 202 page report published on the CSNF's website. This report - the Camley Street Neighbourhood Plan Evidence Base (Dec 2015) - can be downloaded from the following link:

[http://camleystreet.org.uk/wp-content/uploads/2018/12/Camley-Street\\_NP\\_Evidence\\_Base.pdf](http://camleystreet.org.uk/wp-content/uploads/2018/12/Camley-Street_NP_Evidence_Base.pdf)

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## Who was consulted?

4.3 During 2015 the following groups were consulted:

- local residents;
- businesses within the area; and
- employees from the local businesses.

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## How were they consulted?

4.4 Plan Projects devised an approach to consultation in partnership with the CSNF that involved:

- a launch event at the CSNF's AGM on 16th June 2015 to initiate the process;
- follow up questionnaires of local residents, businesses and employees informed by the outcome of the launch event;
- two drop-in events in July and August 2015 to help people understand the Neighbourhood Plan and the questionnaire;
- analysis of questionnaire responses to produce the Evidence Base Report report identifying the key topic areas for the Neighbourhood Plan; and
- publication of the Evidence Base Report on the CSNF's website for all to see, so that everyone could understand the recommended topic areas for policy.

4.5 **AGM Launch Event:** The main questions that Plan Projects wanted to explore at the event were:

- What are the values of the community?

- What are the areas where policy development should concentrate?

- What are residents' perception of the changes taking place in and around the neighbourhood?

- What are the strength and weaknesses of the neighbourhood?

- What are their priorities both for change and preservation?

4.6 A key aim of the event was to increase peoples' awareness of neighbourhood planning and the opportunity it represents.

4.7 The event was publicised through the distribution of a flyer through letterboxes, and by word of mouth with members of the CSNF promoting the event to both residents and businesses.

4.8 The event was held in the evening and involved:

- informal discussions over refreshments on arrival with the Plan Projects and CSNF teams over maps of the area;
- an introductory presentation covering:
  - the Neighbourhood Plan context;
  - the opportunities presented by a Neighbourhood Plan; and
  - a debate / Q&A session.

- distribution of a questionnaire to help identify areas of concern, which was filled in at the event by attendees.

4.9 **Follow-up questionnaires:** Two surveys were devised: one for residents and one for businesses and their employees. These were based around the topics for potential policies discussed at the AGM.

- The questionnaire survey for residents involved delivering a paper copy to every residential address in the designated area, and following this up with a visit to explain the Neighbourhood Plan, encourage completion of the survey and - where possible - to collect the completed survey. 151 completed questionnaires were collected through this process.

- A questionnaire was delivered to employee and business owners working at all of businesses in the Camley Street area; they were invited to complete these forms, and these were returned to the project team. 155 business questionnaires were returned.

**CREATING A NEIGHBOURHOOD PLAN FOR THE CAMLEY STREET AREA**

**June 16<sup>th</sup> 6.00pm - 8.00pm**

**Camley Street Natural Park**

With Camden Council now under more pressure than ever to sell the land it owns on Camley Street to the highest bidder, it's obvious that there are going to be radical changes to our neighbourhood.

Rather than just wait for events to overtake us and planning applications from speculative developers to land on our doorsteps unannounced (again!), we want to take control of the situation - and our future.

So far in 2014 and 2015, we've succeeded in becoming a legally designated neighbourhood forum, organised several public events, and held meetings with Camden Councillors and planning officers.

We've now appointed Plan Projects Ltd to help us create and develop a neighbourhood plan and have it formally recognised by Camden as part of the planning regulations for our neighbourhood. As a first step in this process we've organised a public meeting on the 16<sup>th</sup> to start gathering everyone's views and opinions.

At the same time we'll be holding the 2015 AGM of the Camley Street Neighbourhood Forum - see details on [www.CamleyStreet.org.uk](http://www.CamleyStreet.org.uk)

**Please join us on the 16<sup>th</sup> and share your vision of what the future of the Camley Street area should be, find out about neighbourhood planning, meet the team, maybe even join the team, and start having a bigger say about what happens in our neighbourhood.**

**Be there!**

**Peter, David, Alex, Christian, John - and the rest of us**

4.10 **Drop-in events:** Following on from the AGM launch and the distribution of the questionnaires, two drop-in events were held to (i) raise awareness of the Neighbourhood Plan and (ii) help people understand what it was all about and, where necessary, help people fill in the questionnaire. These drop-in events took place on:

- 31st July 2015
- 1st August 2015

4.11 **Analysis of questionnaire responses:** Plan Projects undertook analysis of the questionnaire responses during the late summer and autumn of 2016, producing the in-depth Evidence Base Report.

4.12 **Publication of the Evidence Base Report:** The Evidence Base Report was published on the CSNF website in December 2015.

### What issues were raised?

4.13 The Camley Street Neighbourhood Plan Evidence Base report provides a summary as well as considerable detail of the issues raised. In this Consultation Statement, we focus on the key issues raised.

4.14 Overall there is a desire among residents to preserve what they love most about the neighbourhood, its tranquillity and sense of community. This desire for continuity extended to the distribution of land uses in the neighbourhood; the majority of residents supported its function as a place of employment and feel the strength in light industrial activity of various sorts should be supported.

4.15 Looking to the future, they would like to see

- the strong community spirit that currently exists to be strengthened through the provision of improved social

infrastructure and commercial leisure (pubs, cafés and restaurants) to generate more 'life';

- the green spaces in the neighbourhood to be improved to create a public realm that invites more active use and can provide a safe and comfortable environment for walking and cycling;
- the provision of housing that is affordable for people on average London incomes;
- a greater level of integration between the land uses; and
- while the area feels safe to most people, there is concern about small-scale criminality and anti-social behaviour, such as drug dealing and fly-tipping.

4.16 Camley Street is a small neighbourhood, and should not attempt to be self-sufficient, but a clear distinction should be drawn between those services that should be provided within a five minute walk of people's homes (inside the neighbourhood) and others that can exist beyond the neighbourhood boundaries. In the provision of key services, it is important to note the increase in the population size that will come as a result of new development make the provision of adequate social and commercial infrastructure fundamental.

4.17 In terms of the policy topic areas, the key issues raised are set out below:

4.18 **Environmental quality:** The neighbourhood underperforms in terms of its overall environmental quality; a large minority of residents are dissatisfied with both the standards of cleanliness and its physical appearance.

4.19 **Public safety:** The Camley Street area is, on the whole, seen as a reasonably safe place, with crime rates that are comparable to those of the wider borough. There was, however, an appetite for greater use of the street scape for play and other forms of cultural activity but it is not considered safe. For example, a great majority of people say they would like to see children able to play in the streets, but that the speed and volume of traffic forbids this.

4.20 **Development:** There was widespread support in the community for the continuation of Camley street's role as a place of employment, with a range of commercial activities led by light industry.

4.21 Residents were clear, however, that housing, within a balance of types and tenures, should be a priority for how development land should be apportioned. In addition,

it is worth noting a large minority of residents (48%) were dissatisfied with the range of goods and services in the area, making a case for improved provision of civic, retail and commercial leisure uses.

4.22 **Employment:** Camley Street already boasts a diversity of different industrial sectors, and spatial planning should seek to reinforce this trend. It is also a natural place for people to choose to live given its central location, positioned very close to many centres of employment.

4.23 Taken as a whole, there was clear enthusiasm both among workers and the businesses that employ them, for Camley Street as an employment and trading location. Most businesses are well established and have been present in the neighbourhood for many years.

4.24 **Public realm:** Taken as a whole, there is a satisfactory amount of green space either within the neighbourhood, or close by. These areas are, however, in many cases poorly maintained and not fulfilling their potential.

4.25. **Transport:** Walking and the use of public transport characterise the way people move around in Camley Street. In addition, there is low car ownership. The overarching finding is that, while there is a wealth of transport infrastructure within ten minutes' walk, the Camley Street neighbourhood itself is bereft of transport links. There are multiple calls for a bus service running through the neighbourhood, together with improved infrastructure for both cycling and walking.

4.26 **Housing:** Home ownership and even homes for rent within Camley street are beyond the reach of people on average London incomes; it is not surprising therefore that the vast majority of people would like to see a greater provision of affordable housing, within a broad mix of tenures. It is also interesting to note families are far and away the group people feel are most in need; this may be connected to the issue of overcrowding.

4.27 **Social life:** While there is good community spirit, opportunities for social activity in the Camley Street neighbourhood are limited, and it's instructive that a large minority of people (40%) feel it's a poor place to socialise. There is also a heavy reliance on the Constitution pub; if this were to close it would deal a body blow to the neighbourhood.

4.28 Positive features include:

- People particularly value the area's central location. 33% of respondents provided feedback in relation to its location.
  - People also liked the area's sense of calmness, away from the busier town centres at King's Cross and Camden Town. Almost half of respondents (48%) commented that the area had a sense of calm and tranquillity.
  - The sense of community is valued – 49% of respondents enjoyed this aspect of the area and expressed a preference towards maintaining the current community spirit.
  - Over half of respondents were happy with the physical appearance of the area.
  - As the only local supermarket, the Co-op is heavily used. Any additional housing proposals in the area should be accompanied by further retail and social infrastructure and services to serve the needs of existing and new populations.
  - 50% of residents surveyed agreed that they have good access to green space.
  - 18.7% of the working population in the area work within 2km of their home.
  - 70% of those surveyed agreed that the area's role as an important employment hub is valuable and should be protected.
- 4.29 Views on Planning for the Future of the Area Included:
- Current imbalance of locations of open spaces. Residents at Barker Drive are well served, but those at Weavers flats are not.
  - Calls for bus services along St Pancras Way and improved cycle infrastructure – over half of respondents (51%) wanted improved bus services/bus stop.
  - Whilst there is a strong sense of community, there is a lack of places for social interaction - 40% of residents did not agree that the area is a good place to socialise.
- 4.30 Views on Planning for the Future of the Area Included:
- Wish to retain the balance of uses – 17% of respondents expressed a wish to retain employment uses and 17% of respondents expressed a wish to retain housing as the predominant use in the area.
  - 22% of respondents expressed a wish to see better community facilities and options for social interaction.
  - 15% of respondents wanted increased access to green spaces.
  - Future employment uses should include light industrial workspace (37.8%), shops (34.7%) and other office uses (23.5%).
  - Housing was viewed as the greatest priority for the area; 32% of those surveyed, with employment uses second, 25.9% and shops and leisure 20.5% and 20.1% respectively.

#### 4.29 Areas where there were particular concern included:

- A small number of respondents (8%) perceived general levels of connectivity as poor.
- There were a number of concerns raised surrounding criminal and anti-social behaviour. 20% of respondents were worried about perceptions of safety within the NP Area.
- Strong concerns were raised regarding environmental quality. Requests for a more robust regime for dealing with waste. Areas noted as being particularly poor include; under the Camley Railway Bridge and at the junction of Camley Street and Barker Driver and Crofters Way.
- 29% of respondents reported inadequate street lighting around Elm Village Open Space and under the bridge by the garages, leading to further concerns regarding safety and security.

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### How the issues raised were considered

4.31 The Evidence Base Consultation was used to establish the key policy areas around which the Neighbourhood Plan was developed. These key policy areas were developed to become the 'Core Objectives' seen in the Plan today:

- employment;
- local community and social needs;
- housing;
- sustainable transport;
- green infrastructure; and
- design quality.

## 5 Producing the Draft Neighbourhood Plan

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### Introduction

5.1 The CSNF secured funding from Locality to support the appointment of AECOM to help develop a draft Neighbourhood Plan. AECOM worked closely with the CSNF to develop a plan around the Core Objectives identified in the Evidence Base Consultation. No further public consultation took place during the period of producing the Neighbourhood Plan, which took place during 2016 and 2017, with the final draft published on the CSNF's website on 18th May 2017.

5.2 Although there was no public consultation during this period, the policy/draft plan was a product of earlier consultation. AECOM and the CSNF consulted with the London Borough of Camden's planning department on the draft Neighbourhood Plan to ensure that the framing of the policies would be workable. The purpose of this consultation was twofold:

- to understand whether there were likely to be any issues of conformity with higher level policy; and
- to check that the Neighbourhood Plan would be a functional tool for planning officers to use in making decisions on planning applications.

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### Who was consulted and how?

5.3 Officers at LB Camden were provided with a copy of the draft Neighbourhood Plan, which they reviewed and provided written comments which were discussed at a meeting with AECOM and the CSNF. At this stage, the draft Neighbourhood Plan presented options for policies to allow discussion around the issues with LBC planning officers.

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### What issues were raised?

5.4 The major issues raised by officers were related to housing policies, and are summarised below.

5.5 **Core Objective 3** in the Draft Neighbourhood Plan stated that '*Development will encourage the growth of a blended community through the provision of different housing types.*' This was supported by three sub-objectives:

- all new dwellings will be for rent and will be affordable (Neighbourhood Forum currently defines affordable

as rent not exceeding one third of average Camden incomes);

- housing suitable for families will be prioritised; and
- no new student housing blocks to be permitted in the area.

5.6 Whilst LBC officers acknowledged that the sub-objective of prioritising housing suitable for families was in line with higher level policy, they had significant concerns about the other two sub-objectives.

5.7 In relation to the objective of all new housing being for affordable rent, LBC officers noted:

- Neighbourhood planning policies need to be viable in accordance with paragraph 173 of the NPPF. This means striking a balance between the delivery of affordable housing (a substantial development cost) and delivering growth.
- Through the emerging Local Plan Camden is seeking an affordable housing target of 50% for developments with capacity for 25+ dwellings. A "sliding scale target" is proposed for developments providing 1+ additional home and with capacity for less than 25 additional dwellings (starting at 2% for one home and increasing by 2% for each home added).
- The Council's affordable housing targets are set at a level where they do not put at risk the majority of development schemes (taking into account the costs of other planning obligations, e.g. open space and educational contributions). The targets are informed by independently produced viability assessment.
- It is very unlikely given the funding context for affordable housing (loss of grant) and the costs of bringing forward development that a target higher than Camden's can be justified. As worded, this would not be conformity with the Council's planning policies

5.8 In relation to no new student housing blocks, LBC officers noted:

- The Plan is not able to place a bar on one type of housing or accommodation. This would be contrary to the approach of the NPPF where each development should be considered "positively" and against its individual merits.

- This approach is likely to be contrary to the London Plan which emphasises that London Boroughs should plan for the needs of students, e.g. para. 3.52: “London’s universities make a significant contribution to the economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation...New provision may also tend to reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector”.

5.9 **CO3 - Housing Policies** expanded on the policy objectives to present emerging policies and policy options. Extracts from the CO3 policies that attracted most comment from LBC officers are provided below:

- new family housing should be overwhelmingly set aside for long-term rent;
- development should deliver housing that is within reach of ‘ordinary people’;
- we propose to retain the vast majority of new housing for social and intermediate rent;
- provision of affordable housing where affordability is defined as not substantially in excess of third of average household incomes in Camden;
- no absolute target is set for the proportion of affordable dwellings, but the Local Authority’s target of 50% should be treated as a minimum; and
- the Forum wishes to limit the quantity of additional student housing in the Plan area.

5.10 LBC officers made similar comments in relation to the Housing Policies to those made on the objectives above with the following additional comments:

- in relation to ‘overwhelmingly’, LBC recommended introducing greater flexibility through terminology such as ‘maximum practicable’. Officers noted that this approach does not take into account the need for market housing to cross-subsidise and help deliver affordable housing. It could be a barrier to development coming forward and would not comply with Camden’s planning policies. It is also unclear why ‘long-term rent’ is considered to be preferential for families;
- in relation to ‘within reach of ordinary people’, LBC officers were concerned that this could raise expectations – starter homes in Camden are likely to cost more than

renting in the private sector, so they would not fall within the current definition of affordable housing;

- in relation to ‘vast majority’ LBC officers stated that this is likely to be a barrier to delivery as market housing is needed to cross-subsidise the provision of new affordable housing. It would conflict with Camden’s policies;
- In relation to the definition of affordability, LBC officers stated that this conflicts with the diversity of affordable housing types and the difficulties the Council experience in funding social rented housing. This would introduce a different affordable housing definition to the NPPF which neighbourhood plans are not able to do;
- there was concern from officers about treating the Local Authority’s target for affordable housing of 50% as a minimum. Officers stated that the Council seeks to negotiate the maximum viable level of affordable housing up to 50%. In practice, many schemes are not able to deliver as high as 50%. This phrase could be a barrier to development – including the delivery of affordable housing - and conflicts with the NPPF; and
- in relation to no student housing, officers reiterated that the Neighbourhood Plan cannot place a bar on new student accommodation.

5.11 Officers raised a number of minor points, including:

- **Core Objective 5:** Development will increase the range and accessibility of green space in the neighbourhood was supported by a sub-objective seeking improved lighting in public space both in new developments and throughout the neighbourhood. Officers suggested that this need to be ‘where appropriate’ as additional lighting could have impact on biodiversity (e.g. bats).
- **CO1 - Employment policies.** The policy options included a requirement to maintain or increase the amount of B2 use in redevelopment of existing employment uses, Officers suggested that policy refers to maintaining / increasing employment densities as it may be possible to intensify the use of the floorspace. The approach is considered to generally be in line with Camden’s policies. Officers noted that some of the existing employment uses may not be B2.

5.12 Officers made a general comment that each policy should be structured around a brief introduction explaining the intention of the policy, followed by the policy and then a reasoned justification examining how it will be applied and supports national and local planning policy.

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### How the issues raised were considered

5.13 In redrafting the Neighbourhood Plan in preparation for the Regulation 14 consultation, the following changes were made to respond to the issues raised:

5.14 **Housing policy:** The CSNF wanted to retain the strong views expressed during the Evidence Base consultation in 2015 that Camley Street should be an

## Core objective 3:

### Housing

**Development will support the growth of a truly mixed community through the provision of housing of different types.**

#### Sub-objectives

1. To deliver the maximum viable number of dwellings for rent at affordable levels.
2. Housing suitable for families will be prioritised.
3. Seeking to limit the amount of additional purpose-built student blocks in the area.

area with a mix of different housing types and tenures. However, the CSNF recognised the need to ensure that the Neighbourhood Plan complies with the strategic policies of LB Camden's Local Plan and has regard to the NPPF. The core and sub-objectives were amended to maintain the spirit of what was expressed by local people but also provide the flexibility to accord with higher level policy.

5.15 The wording of what became **Policy CS HO1** was made more flexible, setting out an aspiration for achieving 100% affordable housing rather than requiring it.

5.16 The wording of what became **Policy CS HO3** in relation to student housing balanced the concerns of local people of the dominance of student housing in the area with the need to avoid simply banning it. The policy was reworded to positively support student housing in mixed-use developments, where it can be properly integrated.

5.16 **Improved lighting in open space:** Core Objective 5 has removed this requirement. **Policy CS GI1** sets out

more general requirements to improve and enhance green spaces.

5.17 **Employment:** The retention of employment within the Neighbourhood Plan area is a key priority, and the suggested approach of density of employment as opposed to floorspace is complex to secure through policy and impossible to enforce. The Neighbourhood Plan has continued with the approach of at least maintaining existing floorspace in what is now **Policy CS EM1**.

5.12 **Structure of policies:** The structure of the Neighbourhood Plan was refined and developed following LB Camden's comments to provide:

- an introduction to the policy, setting out the issues that it is intended to address; and
- references to the local and national planning policy to which it has regard.

## 6 Informal Consultation

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### Introduction

6.1 During 2018, Tibbalds Planning and Urban Design was appointed by the CSNF to bring the Neighbourhood Plan forward to its statutory Regulation 14 consultation and submission to LB Camden to begin the process of Examination.

6.2 Tibbalds recommended holding an awareness raising event prior to the Regulation 14 consultation to ensure that residents and stakeholders were up to date with how their earlier feedback had been integrated into the policies and objectives. This informal consultation 'piggy backed' on the annual Harvest Party organised by Alara Wholefoods, and took place on 28th September 2018.

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### Who was consulted?

6.3 The following people were consulted:

- local residents;
- businesses within the area; and
- employees from the local businesses.

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### How were they consulted?

6.4 The event includes live music, raffles, and free food and drink. An exhibition of large banners showing key parts of the Neighbourhood Plan formed part of the event. The exhibition was staffed by Tibbalds and members of the CSNF.

6.5 Approximately 130 people engaged in group and one-to-one discussions on the draft Neighbourhood Plan. Attendees were asked to give their feedback on post it notes.

6.6 The exhibition boards can be found in the appendices at the back of this document.

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### What issues were raised?

6.7 **General comments** Most people seemed to like living in the area, and the proximity to the regenerated King's Cross was a major bonus. People talked of a good community; there were a lot of young people and some had children. For most of these, it was a chat about what the plan was seeking to do in terms of the industrial estate itself, but the widening out of that the discuss the Camley Street area's services and facilities and the links more widely.

Some people had lived in the area for some time, but others had recently moved to the area.

6.8 **Anti social behaviour:** People did talk about some of the problems that affect the area. This mainly revolved around the exits and entrances to the area, both under the rail bridge at the south end (much improved now it's better lit) and the railway bridge at the northern end out towards Agar Grove. The latter remains problematic, with abandoned cars and gangs of youths being mentioned a couple of times, alongside other anti social behaviour and 'hanging around'.

6.9 There were also comments about the adjacent developments including Bangor Wharf development (which was seen to have a negative impact on a wild bird sanctuary), Kings Cross and the Camden estates programme.

6.10 **Local community and social needs:** There were comments on the benefits that the Co-op had brought; this has helped the older people in the area and continuing this within the area would be of great benefit. The concerns which had been raised in 2015 about places for people to meet and socialise was echoed, the coop had gone some way to address this, but it was felt more could be done. The addition of a bus would benefit for all residents in the area.

6.11 **Provision of Affordable Housing:** Some people were concerned about maintaining affordable housing in the area (and there were a couple of discussions about what 'affordable' meant ('affordable in London is still not affordable'). In the wider area (mainly in respect of development round Maiden Lane and York Way) there was concern that the taller buildings for market housing hid the social housing away and conditions for social tenants weren't much improved by regeneration. There were also discussions about young people not being able to stay in the area they had grown up in.

6.12 **How rent levels would be managed for businesses:** Some of the small and medium business that were spoken to were concerned about how their rents would be secured going forward. They cited the example of New York where lower rents had been promised in transitional periods, but years later their rents had been increased.

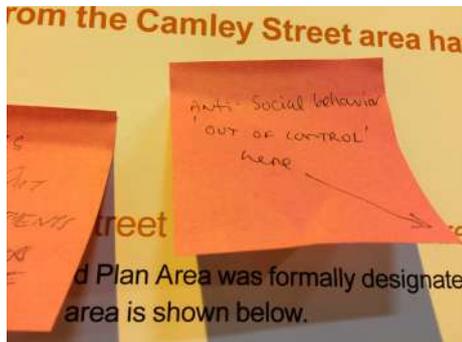
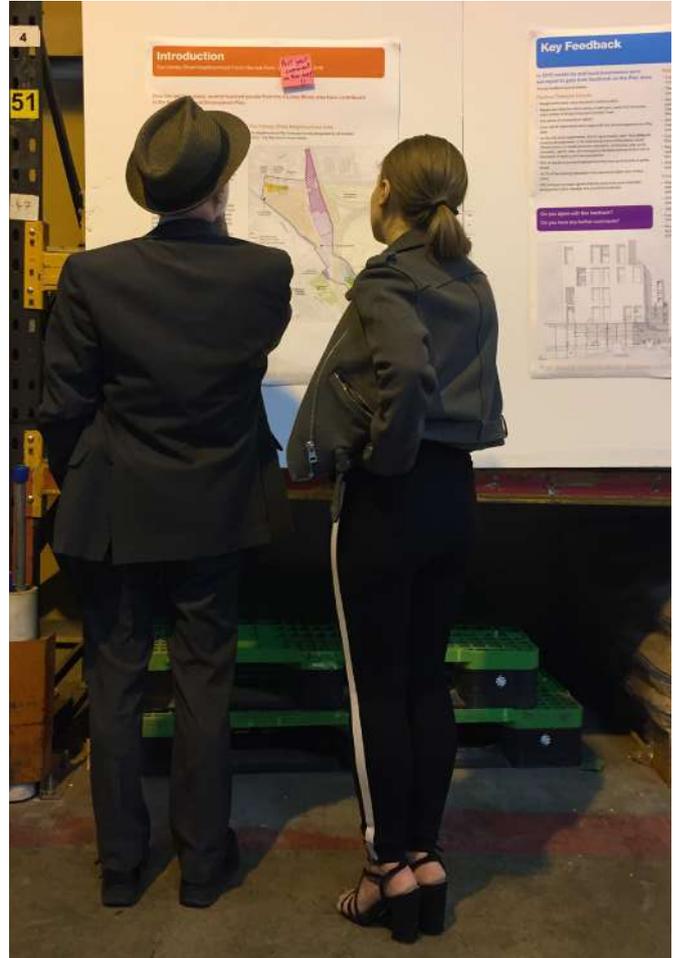
6.13 How conflicting priorities would be addressed: 'There were some comments about the conflicting priorities with respect to walking and cycling. Currently the routes along the canal are not safe either for walkers or cyclists, and conflict often occurs. The mixed development of the area was questioned: in particular, how would buildings of a light industrial nature work with housing above it? Some further investigation is required as to whether there are any models like this being developed in the UK

### How were these issues considered?

6.14 The aim of the Harvest Festival was to raise awareness of the CSNDP, given that there had been a gap in consultation with residents, businesses and key stakeholders.

6.15 The issues raised during this event reinforced many of those raised during the evidence base consultation, which had been considered already within the draft neighbourhood plan. Nothing was raised that meant that changes needed to be made to the Neighbourhood Plan prior to statutory consultation.

6.16 On the whole the event was extremely positive and those who were spoken to were enthusiastic about what could be achieved through the Neighbourhood Plan for residents and businesses in the area.



## 7 Regulation 14 consultation

7.1 Once the draft Neighbourhood Plan was developed, formal consultation as required by Regulation 14 with key statutory stakeholders, residents and the businesses in the plan area was undertaken.

### Who was consulted?

7.2 The following individuals and organisations were consulted:

- Residents in the NP area
- Businesses in the NP area
- Landowners in the NP area
- London borough of Camden Planning department
- London Borough of Camden Asset management team
- Camden District management committee
- Camden Garden Centre
- London Borough of Planning team
- Canal and Rivers Trust
- Greater London Authority
- High Speed One
- London Wildlife Trust
- Natural England
- Somers Town Neighbourhood Forum
- Transport for London

**Camley Street Neighbourhood Development Plan (2018 - 2033) Statutory Consultation**

Over the last four years, several hundred people from the Camley Street area have contributed to the Draft Neighbourhood Development Plan.

We would now like to invite local neighbours, businesses and other interested parties to give their feedback on the plan.

**How can you give your feedback?**

The consultation will be open from Monday 26th November 2018 and close on Sunday 13th January 2019.

It can be viewed online at :  
<http://camleystreet.org.uk>

There will be a series of events at which you will have the opportunity to give your feedback and talk to members of the forum and planning team. They will be held on:

**Wednesday 28th November 2018 16:00-19:00**  
**Monday 10th December 2018 17:00- 20:00**  
**Saturday 5th January 2019 11:00-14:00**

**Where:**  
The Library, Camden Council, 5 Pancras Square, Kings Cross, London N1C 4AG

The information will be displayed permanently between the consultation dates, from the 26th November in the library at 5 Pancras Square.

For further information and to give your feedback please contact:  
Phone: 020 7255 9976  
Or  
Email: [secretary@camleystreet.org.uk](mailto:secretary@camleystreet.org.uk)

Leaflet distributed to the local area to advertise the consultation and events.

### How were they consulted?

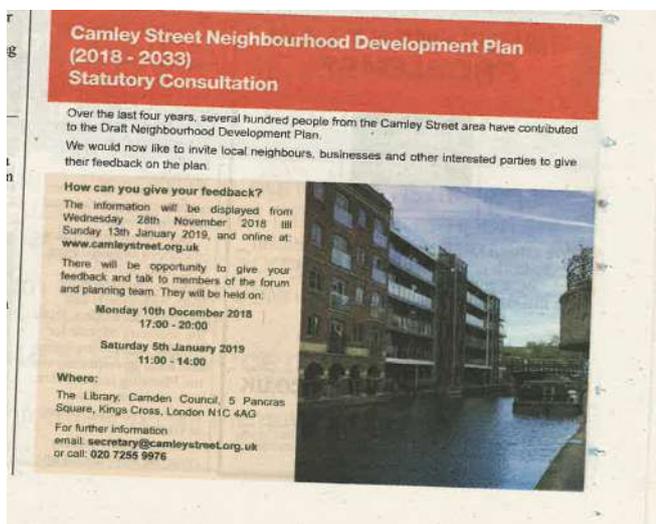
7.3 The consultation was open from Wednesday 28th November 2018 and closed on Sunday 13th January 2019. During this time copies of the Neighbourhood Plan and display boards were displayed in the Council's library at 5 Pancras Square and was available online at:

<http://camleystreet.org.uk>

7.4 During this period there were a number of staffed exhibitions held, to allow residents to ask questions of the Neighbourhood Forum and the Tibbalds team. These took place on the following days to ensure maximum attendance:

- Wednesday 28th November 2018 16:00-19:00
- Monday 10th December 2018 17:00- 20:00
- Saturday 5th January 2019 11:00-14:00
- Sunday 13th January 2019 14:00-16:00

7.5 All of the events took place at the library which falls just outside the neighbourhood plan area, with the exception of the last event, which took place at Camden Garden Centre. This was added by the forum to ensure that there



Advert in the Camden New Journal (29th November 2018)

was an opportunity to give feedback on the final day of the statutory consultation period.

7.6 A feedback form was provided, inviting people to comment on the Neighbourhood Plan. This was either collected at the staffed exhibitions, at the Town Hall, or could be submitted via e-mail.

7.7 The consultation and sessions were advertised in a number of ways including:

- leaflets delivered to the local residents and businesses;
- e-mails were sent to statutory stakeholders ;
- e-mails were sent to those who were on the CSNF email contact list from previous consultation events; and
- the events were advertised in the Camden New Journal.

7.8 Over these sessions the team spoke to approximately 50 residents, employees, and stakeholders. In addition to feedback from residents, businesses and employees, comments were received from:

- Landowners
- London Borough of Camden Asset Team
- Camden District management committee
- Camden Garden Centre
- London Borough of Planning team
- Canal and Rivers Trust
- Greater London Authority
- High Speed One
- London Wildlife Trust
- Natural England
- Somers Town Neighbourhood Forum
- Transport for London

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### **What issues were raised and how have they been considered?**

7.9 We received 114 responses to the Regulation 14 Consultation. This section of the Consultation Statement sets out:

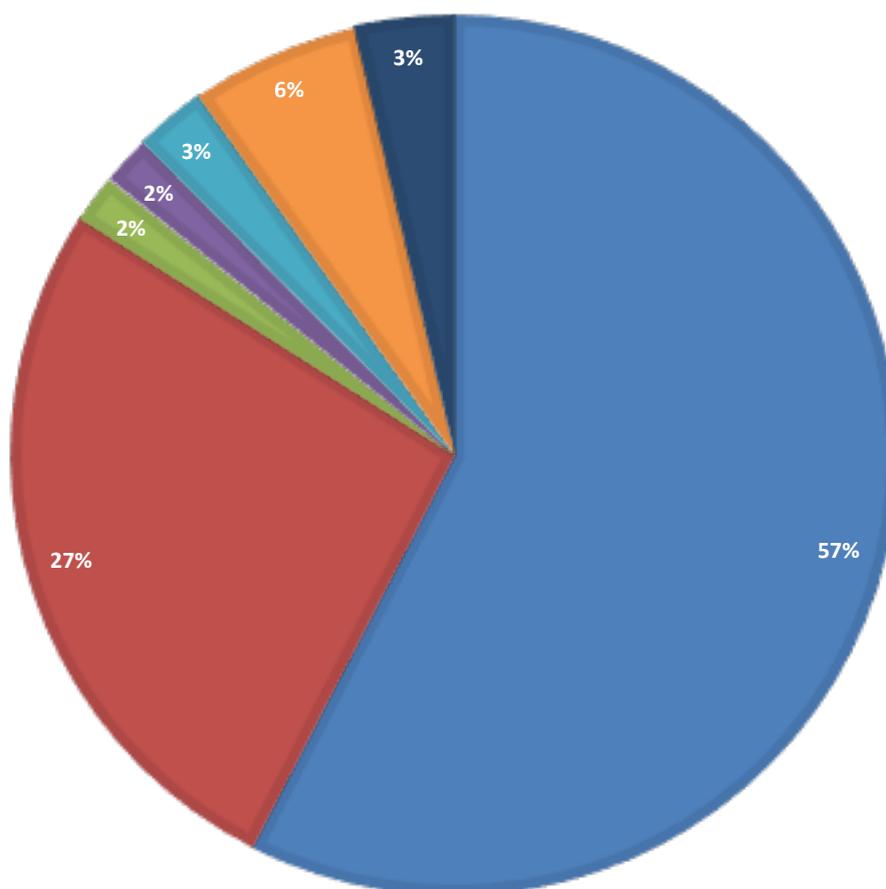
- an assessment of the responses to each of the Core Objectives;
- a table setting out issues raised by residents and how they have been considered;
- a table setting out issues raised by statutory consultees and how they have been considered;
- a table setting out issues raised by the London Borough of Camden and how they have been considered; and
- a table setting out how policy wording has changed following consultation.

## Core Objective 1: Employment

Development will ensure the neighbourhood's continued function as a place of employment led by light-industrial functions.

### Question 1: Do you agree with Core Objective 1: Employment? (EM Policies)

■ Strongly Agree ■ Agree ■ Neither disagree or agree ■ Disagree ■ Strongly Disagree ■ Detailed comments ■ Did not say



7.10 From the responses received to this question 84% strongly agree or agree with Core Objective 1 and the two associated employment policies.

- Residents felt this removing the businesses would have a detrimental effect on those businesses and the increase in travel miles will have an impact environmentally.
- One residents asked whether “the ‘working from home’ aspect be enhanced with provision of childcare, hot desking, shared workspace, to increase flexibility.”
- Some thought there was a need to increase the variety of businesses in the area to include office space, shops, pharmacy and restaurants.

- One resident thought it was “*important to retain businesses and local jobs, to prevent area becoming ‘dormant’*”

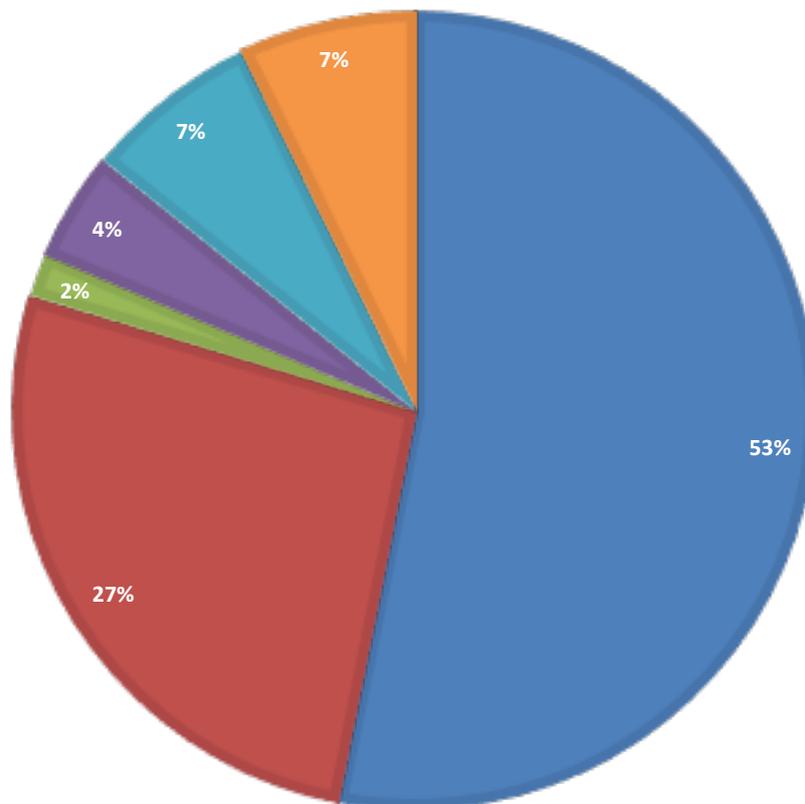
- Not all respondents were positive about the impact of the businesses on the neighbourhood and complained of noise from early deliveries, and the smell from ‘nuisance’ businesses. They felt that these businesses should be moved elsewhere.

## Core Objective 2: Local Community and Social Needs

Development will encourage the strong community spirit that currently exists through the provision of improved social infrastructure.

### Question 2: Do you agree with Core Objective 2: Local Community and Social Needs? (CSN Policies)

■ Strongly Agree ■ Agree ■ Disagree ■ Detailed comments ■ Did not say ■ Neither disagree or agree



7.11 From the responses received to this question 80% strongly agreed or agreed with Core Objective 2 and the associated social infrastructure provision policy.

- Residents welcomed a community facility which catered for all ages, different types of events and potentially sports.
- Many spoke of the community spirit in the area being strong and that it needed to be enhanced through the neighbourhood plan.
- One resident wrote

*“A mixed area is essential to keeping some of the character of an area that has already been transformed, in many ways*

*for the better, but that still needs to retain its own identity and not become a generic redevelopment scheme sold off to the highest bidder.”*

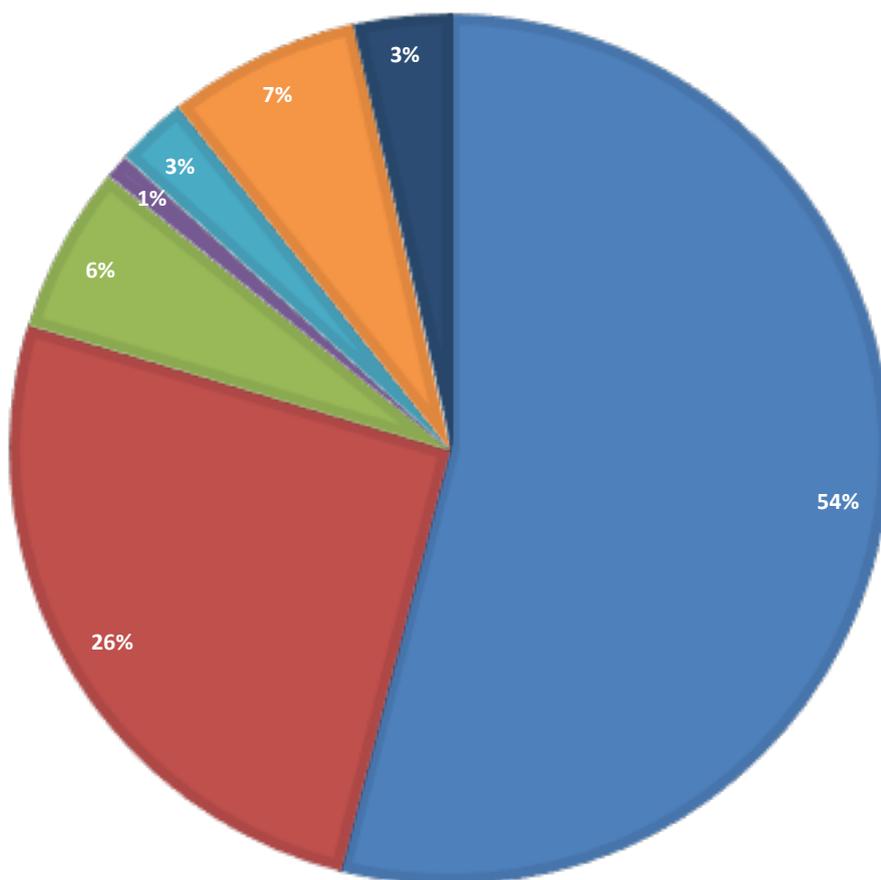
- The Camden Garden centre is one of the few community assets within the area, which provides a social hub for the local community, through the cafe and the centre itself. It is felt that this should be retained and preserved within the area. It was felt that this was not reflected in the draft plan and should be amended.

## Core Objective 3: Housing

Development will support the growth of a truly mixed community through the provision of housing of different types.

### Question 3: Do you agree with Core Objective 3: Housing? (HO Policies)

Strongly Agree Agree Neither disagree or agree Disagree Strongly Disagree Comment Did not say



7.12 From the responses received to this question 80% of respondents strongly agreed or agreed with Core Objective 3 and the associated housing policies.

- The key feedback for residents was around the provision of truly affordable homes, which in other development in the local area seemed to be missing.
- Some felt that there was a requirement to include larger family homes and more homes for residents who had a disability. This housing should fit the local need and demand.
- Both Camden District Management Committee and the Somers Town Neighbourhood Forum support the

levels of affordable homes within the proposed plan and support the viability assessments being made public.

- Some residents agreed that the level of student accommodation should be limited as it creates the feeling of 'ghost towns' in the summer months, when they are not fully occupied.

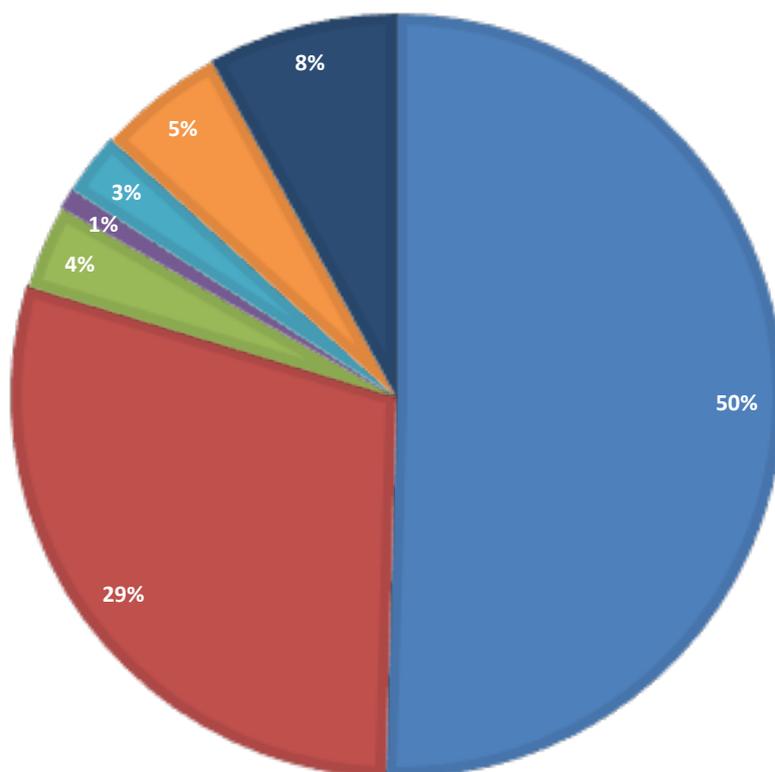
*"The commitment to at least 50% of "affordable" housing with sizeable social housing is very welcome. Also welcome restrictions on student accommodation."*

## Core Objective 4: Sustainable Transport

Development will facilitate improvements to the public realm making walking and cycling easier and providing easier access to local centres, given the long distances from some parts of the Neighbourhood.

### Question 4: Do you agree with Core Objective 4: Sustainable Transport? (TR Policies)

■ Strongly Agree ■ Agree ■ Neither disagree or agree ■ Disagree ■ Strongly Disagree ■ Detailed comments ■ Did not say



7.13 From the responses received to this question 79% of respondents strongly agreed or agreed with Core Objective 4 and the associated sustainable transport policies. The key feedback for residents focused around greener travel which included the use of electric vehicles (including charging points) for both residents and businesses.

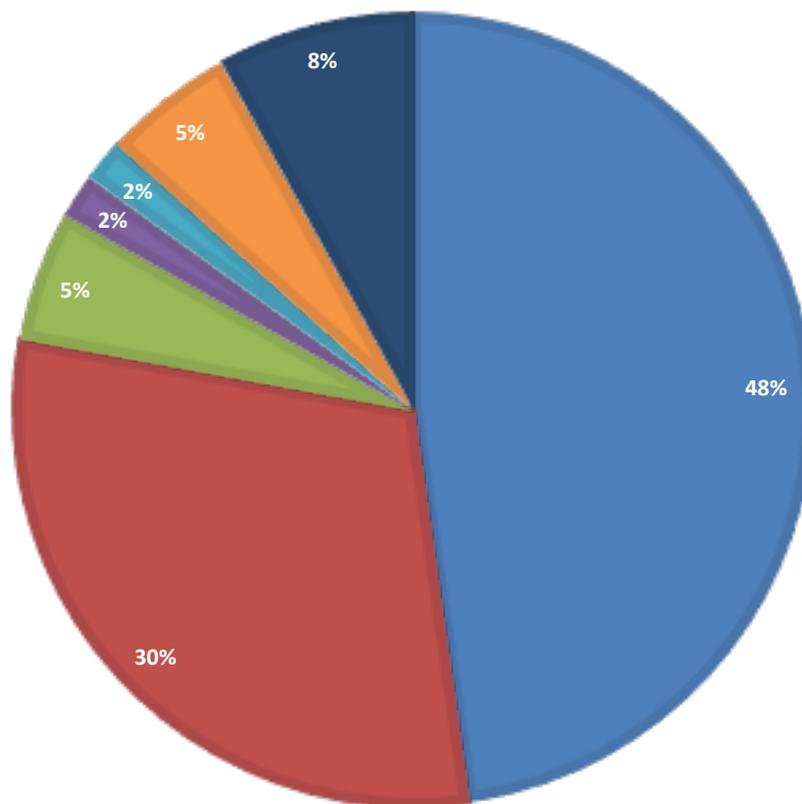
- Many residents spoke of the need to create a better environment for walking and cycling. At present the area is not welcoming or safe.
- Residents also remarked on the need for public transport infrastructure, particularly a bus route to assist older people and disabled people to move around the area more easily. Residents thought that the addition of Santander bikes would help the area.

## Core Objective 5: Green Infrastructure

Development will increase the range and quality of and accessibility to green spaces in the Neighbourhood.

### Question 5: Do you agree with Core Objective 5: Green Infrastructure? (GI Policies)

■ Strongly Agree ■ Agree ■ Neither disagree or agree ■ Strongly Disagree ■ Disagree ■ Detailed comments ■ Did not say



7.14 From the responses received to this question 78% of respondents strongly agreed or agreed with Core Objective 5 and the associated green infrastructure policies.

- The key feedback for residents focused around enhancing the greening of the area, which was seen to be a huge benefit for the neighbourhood plan area. Residents felt that there should be more trees, which should be accompanied with a better maintenance plan.
- Some residents suggested that the safety along the Regents' Canal should be improved.
- One resident said:

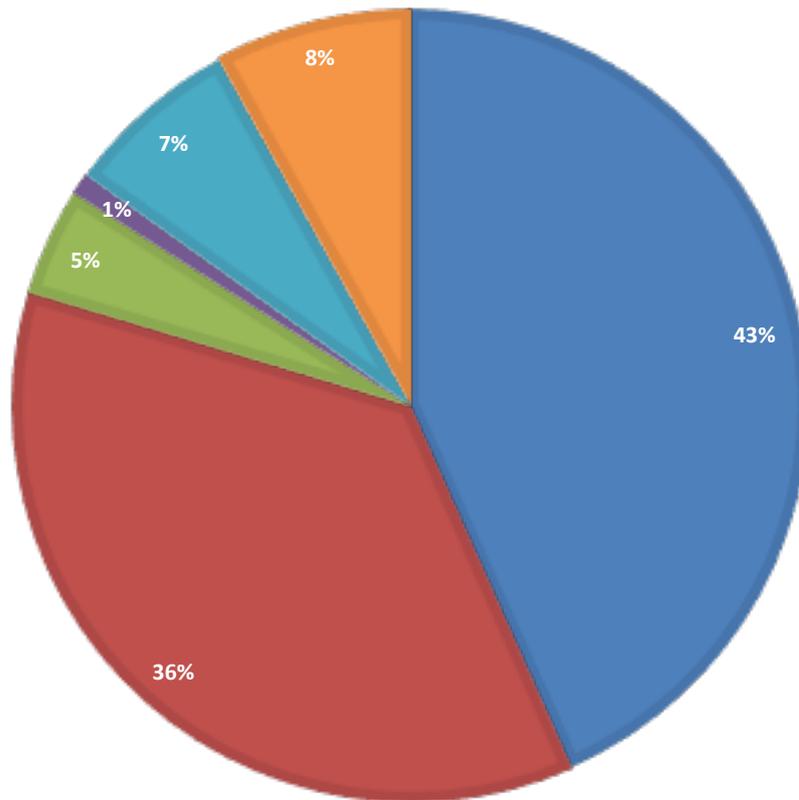
***“Arguably this should be even higher up the list of objectives - an opportunity to take a lead in what truly sustainable / green development can be.”***

## Core Objective 6: Design Quality

**Development will preserve and enhance existing positive features in the local area including nationally and locally designated heritage assets and views and should maximise opportunities to enhance accessibility and legibility throughout the Plan area, in particular improving the experience for pedestrians and cyclists, with regard to safety and comfort.**

### Question 6: Do you agree with Core Objective 6: Design Quality? (DQ Policies)

■ Strongly Agree ■ Agree ■ Neither disagree or agree ■ Strongly Disagree ■ Detailed comments ■ Did not say



7.15 From the responses received to this question 79% of respondents strongly agreed or agreed with Core Objective 6 and the associated design quality policies.

- The key feedback for residents focused around making the Camley Street area distinctive and tying in with the many heritage aspects that are enjoyed.
- The frontages stepped back from the road were welcomed by residents.
- There were concerns that current developments in and around the Camley Street have been too high.

*“Architectural design needs to be future proof, and a real asset to the area. New designs need to set themselves apart from recent styles and materials used on Camley Street, and champion sustainable eco design.”*

## Summary of Changes to the Core Objectives and Associated Sub-Objectives following Regulation 14 Consultation

7.16 This part of the Consultation Statement sets out the changes that were made to the Neighbourhood Plan following feedback from the statutory Regulation 14 consultation. Full details of the feedback received and how it has been considered are set out in the tables in Appendices 11,12 and 13. The changes relate to three elements of the Neighbourhood Plan:

- the Core Objectives;
- the sub-Objectives; and
- the policies.

7.17 The table overleaf shows how the policies have changed from the Plan subject to consultation, with additional text shown in red and deleted text shown struck through.

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### Amendments to Core Objectives

7.18 Following the Regulation 14 consultation, the Forum sought to review the six core objectives that ultimately inform the Plan policies, in line with consultee comments. Whilst the majority of respondents were supportive of the objectives, the Forum felt that they could be refined. In line with this the six core objectives have been amended as follows:

- 7.18.1 Core Objective 1 - Amended to provide greater emphasis on the role existing light industrial uses play within the Neighbourhood Area. There is also additional reference to providing workspace for start-ups and SME's.
- 7.18.2 Core Objective 2 - No change to wording.
- 7.18.3 Core Objective 3 - Amended in line with aspirations to promote mixed use development, including building typologies that support the integration of residential uses with light industrial functions. Greater emphasis given to the need for affordable housing, including homes suitable for families.
- 7.18.4 Core Objective 4 - Wording refined to provide a clearer strategic aim for sustainable transportation within the Neighbourhood Area.
- 7.18.5 Core Objective 5 - No change to wording.

- 7.18.6 Core Objective 6 - Amended to give greater emphasis to design quality and encouraging sustainable development.

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### Amendments to Sub-Objectives

7.19 As a result of the proposed changes to the six Core Objectives, the Forum then chose to review the sub-objectives, which give a more detailed insight into how the Core Objectives will be achieved. The key changes to the sub-objectives under the six key areas are outlined below:

#### 7.19 .1 Core Objective One: Employment

- No key changes.

#### 7.19 .2 Core Objective Two: Local Community and Social Needs

- Removed reference to provision of a 'community hub'. Amend wording to refer more broadly to 'social infrastructure provision'.
- New sub-objective referring to the protection of existing community assets.

#### 7.19 .3 Core Objective Three: Housing

- New sub-objective referring to the strategic aspiration for mixed-use development that supports both residential and light industrial uses.

#### 7.19 .4 Core Objective Four: Sustainable Transport

- New sub-objective which seeks to mitigate and manage the impacts of light industrial traffic on other uses.
- Greater emphasis given to sustainable modes of transport for non-residential uses.

#### 7.19 .5 Core Objective Five: Green Infrastructure

- No key changes.

#### 7.19 .6 Core Objective Six: Design Quality

- Greater emphasis given to the importance of design quality within all new development.
- Greater emphasis given to encouraging sustainable development throughout the Neighbourhood Area.
- New sub-objective relating to tall building proposals.

## Summary of Policy Wording Changes following Regulation 14 consultation

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<b>Employment</b>		
Policy CS EM1 – Employment Floorspace Provision	<p>Development proposals involving the redevelopment of existing employment sites:</p> <ul style="list-style-type: none"> <li>a) Must ensure that the amount of existing B1(c) light industrial employment floor space and B8 storage and distribution space present on a site is, as a minimum, maintained and preferably increased;</li> <li>b) Must ensure that all replacement business and industrial floor space is suitable for meeting the operational needs of existing and other comparable new occupiers;</li> <li>c) Must consider providing additional class B uses for small and medium sized enterprises (SMEs), a proportion of which should be suited to meeting the needs of both start-up and move-on space; and</li> <li>d) Must ensure that any new B1(c) (light-industrial) floor space provided is charged at average Greater London rental rates at the time of development. Any other B1 uses (office space) provided should have a proportion of affordable workspace.</li> </ul> <p>The affordable workspace provided on site should be managed by a specialist provider for office and light-industrial uses to support existing and new small businesses. The provider must be identified prior to implementation of the development in order to ensure that the space caters for specific needs.</p>	<p>Development proposals involving the redevelopment of existing employment sites:</p> <ul style="list-style-type: none"> <li>a) Must ensure that the amount of existing B1(c) light industrial employment floor space and B8 storage and distribution space present on a site is, as a minimum, maintained and preferably increased <b>where feasible</b>;</li> <li>b) Must ensure that all replacement business and industrial floor space is suitable for meeting the operational needs of existing and other comparable new occupiers;</li> <li>c) Must consider providing additional class B uses for small and medium sized enterprises (SMEs), <b>where feasible</b>, a proportion of which should be suited to meeting the needs of both start-up and move-on space; and</li> <li>d) Must ensure that any new B1(c) (light-industrial) floor space provided is charged at average Greater London rental rates at the time of development. Any other B1 uses (office space) provided should have a proportion of affordable workspace.</li> </ul> <p>The affordable workspace provided on site should be managed by a specialist provider for office and light-industrial uses to support existing and new small businesses. The provider must be identified prior to implementation of the development in order to ensure that the space caters for specific needs.</p>
Policy CS EM2 – Retention of Existing Businesses	<p>In support of LB Camden’s Local Plan Policy E2, those existing businesses within the NP area that both offer employment opportunity to Camden residents and support the functioning of London’s CAZ should be offered equivalent replacement space as part of the business and industrial space provision in any redevelopment proposals. This offer should be made to those businesses at an affordable rent while ensuring that business continuity is ensured as far as possible (which will be managed by planning obligations).</p> <p>Where these businesses wish to remain on site, efforts should be made to retain and integrate them into any redevelopment scheme.</p> <p>The businesses meeting these criteria at the time of the adoption of this plan are listed in the reasoned justification below.</p> <p>Should any of these businesses wish to relocate outside the NP area, the total net floor space vacated should be offered to other comparable business and industrial operators at comparable average Greater London light-industrial rental levels.</p>	<b>No change to policy wording.</b>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<b>Social and Community Infrastructure Needs</b>		
Policy CS CSN1 – Social Infrastructure Provision	All proposed developments should demonstrate how they are contributing to the collective well-being of the NP Area through the inclusion of on-site community facilities and/or provision of contributions to off-site improvements to the existing social infrastructure.	<p><del>All developments should demonstrate how they are contributing to the collective well-being of the NP Area.</del></p> <p><b>Developers of major proposals will be expected to consult with the Neighbourhood Forum and provide identified on-site community facilities and/or contributions to off-site improvements to existing social infrastructure (within the NP Area boundary).</b></p> <p><b>Any proposal that will result in the loss of or significant harm to identified existing community assets should be refused.</b></p>
<b>Housing</b>		
Policy CS HO1 – Affordable Housing Provision	<p>All developments proposing a residential element will be expected to contribute to the borough's affordable housing need by:</p> <p>a) Delivering the maximum viable quantum of affordable housing on site:</p> <ul style="list-style-type: none"> <li>- With a minimum of 50% and an aspiration of achieving 100%;</li> <li>- Viability Assessments submitted in support of schemes will be subject to scrutiny and made publicly available;</li> <li>- The desired affordable mix is 60% London Affordable (or similar) rent, 40% intermediate products.</li> </ul> <p>b) Providing a range of different unit sizes and housing types, including three- and four-bedroom homes suitable for families.</p>	<p>All developments proposing a residential element will be expected to contribute to the borough's affordable housing need by:</p> <p>a) Delivering the maximum viable quantum of affordable housing on site:</p> <ul style="list-style-type: none"> <li>- <b>With a minimum of 50% on publicly owned land and 35% on all other land and an aspiration of achieving 100%;</b></li> <li>- Viability Assessments submitted in support of schemes will be subject to scrutiny and made publicly available;</li> <li>- The desired affordable mix is 60% London Affordable (or similar) rent, <b>40% London Living Rent (or similar).</b></li> </ul> <p>b) Providing a range of different unit sizes and housing types, including three- and four-bedroom homes suitable for families, <b>adaptable units for older people and suitable housing for those with a disability subject to locally assessed need.</b></p> <p><b>c) Innovative housing that supports home working will be encouraged.</b></p>
Policy CS H02 – Residential Provision within Mixed Use Development	<p>Proposals to re-develop single-use non-residential areas into mixed-use developments should provide at least 50% of all additional floorspace as self-contained housing.</p> <p>Proposals to re-develop commercial areas into mixed-use development should provide 50% of all additional floor space 1,000sqm or more as self contained housing</p>	<p><del>Proposals to re-develop single-use non-residential areas into mixed-use developments should provide at least 50% of all additional floorspace as self-contained housing.</del></p> <p>Proposals to redevelop <b>sites that currently support industrial uses</b>, into mixed-use developments should provide at least 50% of all additional floor space created, <b>of 1,000sqm or more</b>, as self-contained housing <b>where residential development is demonstrated to be compatible with other uses on the site in line with Local Plan Policy H2.</b></p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<p>Policy H03 – Student Accommodation</p>	<p>Student accommodation integrated into mixed-use developments that includes accommodation for other residents will be supported.</p> <p>Mixed-use developments that include residential use may include accommodation designed specifically for students subject to the following criteria:</p> <ul style="list-style-type: none"> <li>a) at least 90% of new housing should be provided as permanent self-contained homes (use class C3);</li> <li>b) residential floor space conforms with Policy HO1;</li> <li>c) an element of affordable student accommodation should be provided as part of any proposal for student accommodation (subject to viability);</li> <li>d) mono-use student blocks will not be supported.</li> </ul> <p>Within the Cedar Way area, student accommodation may be provided as a proportion of new residential development, provided that the potential for linkage with class B workspaces within the development is explored.</p>	<p>Student accommodation <b>properly integrated and managed within new mixed-use</b> developments that <b>also</b> includes <b>separate self-contained housing</b> will be supported.</p> <p>Mixed-use developments that include residential use may include accommodation designed specifically for students subject to the following criteria:</p> <ul style="list-style-type: none"> <li>a) at least 90% of <b>new residential units brought forward within the NP Area</b> should be provided as permanent self-contained homes (use class C3);</li> <li>b) residential floor space conforms with Policy HO1;</li> <li>c) an element of affordable student accommodation should be provided as part of any proposal for student accommodation, <b>as per the Housing SPG 2016</b> (subject to viability);</li> <li><b>d) an element of accessible student accommodation should be provided as part of any proposal for student accommodation, including ensuring that all communal and amenity areas are wheelchair-accessible;</b></li> <li>e) mono-use student blocks will not be supported.</li> </ul> <p>Within the <b>mixed-use area identified within figure 45</b>, student accommodation may be provided as a proportion of new residential development, provided that the potential for linkage with class B workspaces within the development is explored.</p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<b>Sustainable Transport</b>		
<p>Policy CS TR1 – Managing Industrial Traffic</p>	<p>Development within the NP Area should mitigate, manage and reduce the impacts of vehicular traffic along Camley Street, particularly in relation to goods deliveries, construction / demolition, and freight movement, by:</p> <ul style="list-style-type: none"> <li>a) Providing space for off-street loading bays to avoid disruption to traffic;</li> <li>b) Delivery management plans should be submitted for all developments, demonstrating how deliveries will avoid major disruption to neighbouring residents;</li> <li>c) Proposals should look to utilise alternative modes of transport where possible such as mode shift from road to rail and/or provision of rapid electric-vehicle charging points for freight vehicles;</li> <li>d) Industrial traffic should be segregated from pedestrian and cycle routes in order to minimise conflicts and air and noise pollution; and</li> <li>e) Proposals should reduce carbon emissions through last-mile schemes including by cycle and/or electric vehicle.</li> </ul> <p>Where appropriate, mitigation through direct provision of public-realm improvements and/or highway improvements will be required in order to address any adverse transport impacts identified.</p>	<p>Development within the NP Area should mitigate, manage and reduce the impacts of vehicular traffic along Camley Street, particularly in relation to goods deliveries, construction /demolition, and freight movement, by:</p> <ul style="list-style-type: none"> <li>a) Providing space for off-street loading bays to avoid disruption to traffic;</li> <li>b) <b>Submitting delivery management plans for all employment-generating developments</b> demonstrating how deliveries and servicing will avoid major disruption to neighbouring residents;</li> <li>c) <b>Reducing freight movements overall through freight consolidation and co-ordinating delivery strategies;</b></li> <li>d) <b>Utilising</b> alternative modes of transport where possible, such as modal shift from road to rail, and/or the provision of rapid electric-vehicle charging points for freight vehicles;</li> <li>e) <b>Segregating</b> industrial traffic from pedestrian and cycle routes, <b>where practicable</b>, in order to minimise conflicts and air and noise pollution;</li> <li>f) <b>Identifying opportunities to utilise the Regent’s Canal for the movement of freight; and</b></li> <li>g) <b>Reducing</b> carbon emissions through last-mile schemes, including by bicycle and/or electric vehicle.</li> </ul> <p>Where appropriate, mitigation through direct provision of public-realm improvements and/or highway improvements will be required in order to address any adverse transport impacts identified.</p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<p>Policy CS TR2 – Encouraging Walking and Cycling</p>	<p>Development proposals within the NP area should maximise the quality of walking and cycling conditions by respecting the principles below:</p> <p>Connecting the Network: Proposals should connect to existing cycle and walking routes and to key areas and assets such as public transport hubs, the Jubilee Greenway and Regent’s Canal tow-path, King’s Cross development and Cedar Way.</p> <p>Improving and Upgrading the Network: Existing footway space should be maintained and, where possible, increased as a result of development. Pedestrian crossings, particularly along Camley Street, should be upgraded. Proposals should create ‘leisure’ spaces and routes in order to create an enjoyable walking experience that promotes health and well-being.</p> <p>Creating a Legible Network: Cycle and pedestrian routes should be made clear and legible, through the provision of directional signage (such as Legible London, providing street names and local landmarks), particularly at key entrances into the NP area at Barker Drive/St. Pancras Way, along the tow-path next to The Constitution pub, at the Co-op convenience store and along Camley Street.</p> <p>Ensuring an Integrated Network: Parking facilities for cyclists should, as a minimum, meet the emerging London Plan standards. Public cycle parking should be integrated within the public realm at key points along the cycle network. Both walking and cycling routes should integrate well within the street scene and minimise conflict with other transport modes. Private cycle storage should be provided in safe, sheltered and secure locations. All non-residential cycle parking areas should also provide adequate levels of changing and showering facilities.</p>	<p>Development proposals within the NP area should maximise the quality of walking and cycling conditions by respecting the principles below:</p> <p>Connecting the Network: Proposals should connect to existing cycle and walking routes and to key areas and assets such as public transport hubs, the Jubilee Greenway and Regent’s Canal tow-path, King’s Cross development and Cedar Way.</p> <p><b>Creating an inclusive Network: Proposals should be designed to improve physical accessibility throughout the Neighbourhood Area and remove existing barriers to mobility, particularly for people with physical and learning disabilities and older people. Design measures should include: step free access, use of high quality materials for road surfaces and to provide clear distinctions between pedestrian only footways and cycle and vehicular routes, clear and understandable signage and provision of seating along routes for those who tire easily.</b></p> <p>Improving and Upgrading the Network: Existing footway space should be maintained and, where possible, increased as a result of development. <b>Opportunities to enhance the Regents Canal corridor should be explored</b> and pedestrian crossings, particularly along Camley Street, should be upgraded. Proposals should create ‘leisure’ spaces and routes in order to create an enjoyable walking experience that promotes health and well-being.</p> <p>Creating a Legible Network: Cycle and pedestrian routes should be made clear and legible, through the provision of directional signage (such as Legible London, providing street names and local landmarks), particularly at key entrances into the NP area at Barker Drive/St. Pancras Way, along the tow-path next to The Constitution pub, at the Co-op convenience store and along Camley Street.</p> <p>Ensuring an Integrated Network: Parking facilities for cyclists should, as a minimum, meet the emerging London Plan standards. Public cycle parking should be integrated within the public realm at key points along the cycle network. Both walking and cycling routes should integrate well within the street scene and minimise conflict with other transport modes. Private cycle storage should be provided in safe, sheltered and secure locations. All non-residential cycle parking areas should also provide adequate levels of changing and showering facilities.</p> <p><b>Addition of Figure 33 illustrating existing transport connections</b></p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<b>Green Infrastructure</b>		
<p>Policy CS GI1 – Protection and Enhancement of Existing Open Spaces</p>	<p>Existing open spaces will be protected and enhanced. This will be achieved by:</p> <ul style="list-style-type: none"> <li>a) Securing financial contributions from new development which will be targeted towards the greening of the area;</li> <li>b) Resisting the loss of smaller amenity areas, trees and vegetation and encouraging the enhancement of such;</li> <li>c) Requiring improvements to green corridors, and links to existing open spaces of value outside the NP area;</li> <li>d) Protecting existing residential gardens and resisting development that would lead to a loss of such spaces;</li> <li>e) Refusing development that would have a direct/indirect harmful impact on, but not limited to, Camley Street Natural Park and Elm Village Open Space.</li> </ul>	<p>Existing open spaces will be protected and enhanced. This will be achieved by:</p> <ul style="list-style-type: none"> <li>a) Securing financial contributions from new development which will be targeted towards the greening of the area;</li> <li><b>b) Existing open areas of townscape, amenity or ecological value should be incorporated into the designs for redevelopment schemes and/ or infrastructure works. These existing areas should be enhanced where possible. Where loss is unavoidable, replacement of the same area, must be provided as a minimum, within close proximity to the existing green space;</b></li> <li><b>c) The loss of all good quality trees in the Neighbourhood Area must be resisted. Where loss is unavoidable, like for like replacement of the existing tree canopy should be provided as a minimum. This should be demonstrated within the landscaping proposals as part of any application;</b></li> <li>d) Requiring improvements to green corridors, and links to existing open spaces of value outside the NP area;</li> <li>e) Protecting existing residential gardens and resisting <b>self-contained residential</b> development that would lead to a loss of such spaces;</li> <li>f) Refusing development that would have a direct <b>or</b> indirect harmful impact on, but not limited to, <b>the Regent's Canal</b>, Camley Street Natural Park and Elm Village Open Space.</li> </ul>
<p>Policy CS GI2 – New Open Space Provision</p>	<p>Development that increases the demand for recreation or amenity shall provide for new green/open space and play space and contribute to the green infrastructure network. This will be achieved through:</p> <ul style="list-style-type: none"> <li>a) Providing appropriate new green and open spaces within all new development including private and public amenity spaces.</li> <li>b) Providing links to key green routes outside the NP area including the proposed Camden Highline project and the Gasholder Park at King's Cross;</li> <li>c) Creating a 'pocket park' within the area which includes, where possible, dedicated play provision. The location of such a green space would be determined through its accessibility to residential areas and by clear, safe and attractive routes to it that exist or can be made;</li> <li>d) Greening the stretch of the Regent's Canal tow-path within the Plan Area to connect the CSNP to the rest of the neighbourhood through smaller green interventions.</li> </ul> <p>Developments which contain a residential element will be expected to provide private and communal amenity space and play space (as per LB Camden and the GLA child yield calculator recommendations.)</p>	<p><b>No change to the policy wording.</b></p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
Policy CS GI3 – Promoting Biodiversity	<p>The Forum wishes to promote biodiversity as a key principle within all new development proposals. This will be achieved through:</p> <p>a) The use of Sustainable Urban Drainage Systems (SUDs) including: permeable paving, soakaways, rain gardens, water butts in all developments in order to mitigate against surface water and sewer flooding and reducing urban heat islands, in particular along Camley Street, Barker Drive, Rossendale Way, Weavers Way and south of Cedar Way;</p> <p>b) Complementing the ‘blue network’ by maximising the use of existing waterways within the NP area for nature and wildlife;</p> <p>c) The provision of sustainable living walls at key points to act as biodiverse landmark features.</p> <p>d) The incorporation of sustainable food-growing opportunities where possible, including providing support to existing community food-growing initiatives;</p> <p>e) The implementation of biodiversity enhancements including, but not limited to, bird and bat bricks and boxes, green and brown roofs and ‘invertebrate loggeries’, native herb communities along boundaries;</p> <p>f) The maintenance of all existing trees within the NP Area that are in good condition and maximising opportunities for new tree planting particularly along Camley Street;</p>	<p>The Forum wishes to <b>secure biodiversity net gain as a key objective</b> within all new development proposals. This will be achieved through:</p> <p>a) The use of Sustainable Urban Drainage Systems (SUDs) including: <b>green roofs and swales</b> permeable paving, soakaways, rain gardens, water butts in all developments in order to <b>enhance biodiversity</b>, mitigate against surface water and sewer flooding and reducing urban heat islands, in particular along Camley Street, Barker Drive, Rossendale Way, Weavers Way and south of Cedar Way;</p> <p>b) Complementing the ‘blue network’ by maximising the use of existing waterways within the NP area for nature and wildlife;</p> <p>c) The incorporation of sustainable food-growing opportunities where possible, including providing support to existing community food-growing initiatives;</p> <p>d) The implementation of biodiversity enhancements including, but not limited to, bird and bat bricks and boxes, green and brown roofs and ‘invertebrate loggeries’, native herb communities along boundaries;</p> <p><b>e) Maximising opportunities for new tree planting particularly along Camley Street;</b></p> <p><b>f) The maintenance of all existing trees within the NP Area that are in good condition and maximising opportunities for new tree planting particularly along Camley Street; The promotion of opportunities for local people to become involved within nature conservation work and biodiversity-related activities;</b></p> <p>g). The provision of sustainable living walls at key points to act as biodiverse landmark features.</p>
<b>Design Quality</b>		

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
<p>Policy CS DQ1 – Responding to Places</p>	<p>Development proposals that respond to places should be in accordance with the principles outlined below:</p> <p><b>Existing Industrial Mix:</b> The Forum wants to secure the transformation of existing areas into a successful new mixed-use neighbourhood. Given this objective, consideration will need to be given to new innovative building typologies that are capable of combining industrial uses and residential/retail/community uses. In addition, due consideration must be given to issues of layout, access, servicing and amenity in order to demonstrate that a high quality residential environment can be secured.</p> <p><b>Existing Residential:</b> The Forum wishes to ensure that the quality of the environment for existing residents is protected and enhanced. Thus, any new development should minimise its impacts by preventing overshadowing and an unacceptable provision/loss of sunlight, daylight or privacy.</p> <p><b>Connectivity:</b> The Forum will seek to ensure that new and existing places link to route networks and facilitate movement along direct, permeable, safe and legible pedestrian and cycle routes. Routes should cater for the requirements of all users. Opportunities to connect areas to strategic road, rail, bus and cycle networks must be utilised and existing barriers to movement overcome; enhancing the environment for pedestrians and cyclists on key links.</p> <p><b>Urban Fabric:</b> The form, mass and height of new development should be appropriate to the urban nature of the site and in keeping with the emerging context provided by development at King’s Cross to the east, Maiden Lane to the north-east and Agar Grove to the north.</p> <p><b>Architectural and Historic Context:</b> Preserve and enhance the settings of existing heritage assets. Protect and enhance existing views identified within Figure 39.</p> <p><b>Landscape and Ecology:</b> Retain existing formal and informal green and open spaces and seek to enhance their quality and connectivity. Explore opportunities to enhance the biodiversity of the area and introduce new, well integrated open and green spaces.</p> <p><b>Sustainable Design:</b> All new proposals will be expected to conform to LB Camden Local Plan standards regarding energy efficiency, air-quality management and climate-change mitigation. Opportunities to secure innovative sustainable design within both new residential and commercial buildings should be maximised.</p>	<p><b>All development proposals should respond appropriately to the existing Neighbourhood Area</b> in accordance with the design principles outlined below:</p> <p><b>Existing Industrial Mix:</b> The Forum wants to secure the transformation of existing areas into a successful new mixed-use neighbourhood. Given this objective, consideration will need to be given to new innovative building typologies <b>that can contribute towards delivering high-quality mixed-use developments</b>, are capable of combining industrial uses and residential/retail/community uses. In addition, due consideration must be given to issues of layout, access, servicing and amenity in order to demonstrate that a high quality residential environment can be secured.</p> <p><b>Existing Residential:</b> The Forum wishes to ensure that the quality of the environment for existing residents is protected and enhanced. Thus, any new development should minimise its impacts by preventing overshadowing and an unacceptable provision/loss of sunlight, daylight or privacy.</p> <p><b>Connectivity:</b> The Forum will seek to ensure that new and existing places link to route networks and facilitate movement along direct, permeable, safe and legible pedestrian and cycle routes. Routes should cater for the requirements of all users. Opportunities to connect areas to strategic road, rail, bus and cycle networks must be utilised and existing barriers to movement overcome; enhancing the environment for pedestrians and cyclists on key links.</p> <p><b>Urban Fabric:</b> The form, mass and height of new development should be appropriate to the urban nature of the site and in keeping with the emerging context provided by development at King’s Cross to the east, Maiden Lane to the north-east and Agar Grove to the north.</p> <p><b>Architectural and Historic Context:</b> Preserve and enhance the settings of existing heritage assets. Protect and enhance existing views identified within Figure 39.</p> <p><b>Landscape and Ecology:</b> Retain existing formal and informal green and open spaces and seek to enhance their quality and connectivity. Explore opportunities to enhance the biodiversity of the area and introduce new, well integrated open and green spaces.</p> <p><b>Sustainable Design:</b> All new proposals will be expected to <b>achieve and preferably exceed LB Camden Local Plan standards</b> regarding energy efficiency, air-quality management and climate-change mitigation. Opportunities to secure innovative sustainable design within both new residential and commercial buildings should be maximised.</p>

Policy	Pre-submission (Regulation 14) Plan Policy Wording	Proposed Policy Wording following Consultation
Policy CS DQ2 – Connectivity, Accessibility and Legibility	Figure 40 identifies the key accessibility constraints and opportunities within the Neighbourhood Area. New development should help facilitate the delivery of the new connections identified, overcome the barriers to movement, and enhance legibility and pedestrian comfort and safety through new crossings, signage, street furniture and lighting.	<p>Figure <b>45 identifies the key opportunities for new connections</b> within the Neighbourhood Pan Area. New development should help facilitate the delivery of the new connections identified, overcome the barriers to movement, particularly east-west routes, and enhance legibility and pedestrian comfort and safety through new crossings, signage, street furniture and lighting.</p> <p><b>Figure 40 updated to Figure 45. Title amended to: Plan identifying opportunities for new connections in relation to Policy CS DQ2.</b></p> <p><b>Amends to Figure 45 include: future linear park, more emphasis given to east-west connections out of the area, indicative new crossing to Ugly Brown Building shown, Somers Town bridge and Maiden Lane bridge shown, pedestrian and cycle links extended, mixed-use area extended and indicative plot layouts removed, possible locations for pocket parks amended in line with new east-west connections to create a 'logical end'.</b></p>
Policy CS DQ3 – Proposals for Tall Buildings	<p>The wider King's Cross development context will be used to assess the suitability of tall buildings within the redevelopment of the areas defined for mixed use (see Figure 41), provided other policy requirements are met and where they can:</p> <ul style="list-style-type: none"> <li>a) Demonstrate outstanding architecture and incorporate high-quality materials, finishes and details;</li> <li>b) Respond to the scale and grain of the wider King's Cross context and the hierarchy of taller buildings in the area;</li> <li>c) Relate well to existing street widths and make a positive contribution to the streetscape;</li> <li>d) Generate an active street frontage, particularly along Camley Street;</li> <li>e) Provide accessible public space within their curtilage;</li> <li>f) Incorporate sufficient communal space;</li> <li>g) Contribute to defining new and existing public routes and spaces;</li> <li>h) Promote legibility throughout the NP Area;</li> <li>i) Create new and enhance existing views, vistas and sight lines;</li> <li>j) Preserve or enhance heritage assets and the views to/from these and contribute positively to the setting of heritage assets, including conservation areas.</li> </ul> <p>In addition, any tall building will be expected to consider and manage its impact on micro-climatic conditions and existing amenity.</p>	<p><b>No change to the policy wording.</b></p> <p><b>Addition of Figure 47 illustrating where LVMF Strategic Views lie within the Neighbourhood Area as per consultee recommendations.</b></p>

# ■ Appendices

# Area Application

This is an application for definition of the boundary of the “Camley Street Neighbourhood Forum Area”.

The organisation making this application is the proposed “Camley Street Neighbourhood Forum” which is a relevant body for the purposes of section 61G of the 1990 Act.

The “Camley Street Neighbourhood Forum” is capable of being a qualifying body for the purposes of the Localism Act 2011 and is proposing this area application alongside an application for it to be so recognised.

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## 2 BOUNDARY DEFINITION

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The exact boundary of the area is defined by the high resolution map file included with our application. A low resolution copy of the map is shown in section 6 ‘Boundary Map’.

## 3 AREA DESCRIPTION

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The area is an hour-glass shape centred along the north-south axis of Camley Street and bounded almost entirely by existing features of the built landscape – to the north by railway lines, to the east and west by Regents Canal and railway lines, and to the south by Goods Way and Pancras Road.

It is an area of mixed use:

- Residential – the north western side of Camley Street is almost entirely residential with a mix of owner occupied houses and apartments, private rented, social housing and sheltered accommodation.
- Business - the eastern side of Camley Street is almost entirely business premises with small businesses (fashion, photography, garages, etc.), medium size businesses (Alara Wholefoods, IMS of Smithfield, Marigold Health Foods, Bookers, etc.) and national and multinational businesses (Network Rail, Hewlett Packard, DPD La Poste, etc.)
- Institutions and places of social amenity – Barker Drive Gardens, St Pancras Gardens,

St Pancras coroners Court, the adjoining historic St Pancras Old Church and Churchyard, Regents Canal and St Pancras Basin, Camley Street Nature Park and Camden Garden Centre (a non-profit social enterprise).

## 4 BOUNDARY DESCRIPTION

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Starting from the crossroads at the junction of Camley Street, Goods Way and Pancras Road:

- Proceed westerly along Pancras Road towards the railway bridge.
- At the bridge turn northerly and follow the railway lines as far as the bridge over Camley Street.
- Follow the westerly curve of Camley Street as it crosses to the other side of the railway lines.
- Join the line of the adjacent Somers Town Neighbourhood forum boundary through St Pancras Gardens and along the rear of St Pancras Coroners Court and the Dennis Geffen Annex until it meets the boundary wall of St Pancras Hospital.
- Turn right at the boundary wall of St Pancras Hospital and follow the gated alleyway alongside the Dennis Geffen Annex through to Granary Street.
- Turn north westerly along Granary Street and proceed to the right-angled bend at its approximate mid-point, which is also its point of closest approach to the Regents Canal.
- From the mid-point of Granary Street cross directly to the Regents Canal.
- Follow the line of the Regents Canal north west as far as the bridge at St Pancras Way.
- Turn northerly and proceed along St Pancras Way to the far side of the railway bridge carrying the existing London Overground line and the proposed HS2 link. (That is, to a point almost opposite Baynes Street but not as far as Wrotham Road nor the properties along it.)
- Turn east and follow the line of the existing London Overground and proposed HS2 link (so that these are both included within the area) and proceed as far as Camley Street.
- At the intersection with Camley Street turn north and follow the line of the footpath and cycleway that leads to Agar Grove.
- At the intersection with Agar Grove (none of which is included within the area) turn eastwards as far as the bridge over the railway lines.
- Follow the railway lines south until they cross the Regents Canal.
- Follow the Regents Canal in a southerly direction as it approximately parallels Camley Street and continue until the canal turns east.
- When the canal turns east continue the boundary in a south easterly direction

towards Goods Way so as to include all of Camley Street Nature Park.

- At Goods Way turn westerly and re-join the starting point at the intersection of Goods Way, Pancras Road and Camley Street.

## 5 BOUNDARY JUSTIFICATION

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The fact that most of the boundary is defined by railway tracks and waterway, neither of which can be easily crossed, means that the area has always possessed a natural sense of perimeter and identity, and this is the boundary we have chosen to adopt. It is, in a sense, somewhat of an island.

The area boundary was discussed and agreed during a series of meetings in 2012 and 2013 attended by the residents and businesses living and working within the proposed Camley Street Neighbourhood Forum area.

Resident involvement grew out from the Elm Village Tenants and Residents Association (EVTRA) which has been continuously active since the area was rebuilt in the mid-1980s.

Business involvement began in 2012 and was formally inaugurated in a joint resident and business meeting on the 11th December. Camley Street businesses have since held a number of events aimed at increasing neighbourhood involvement and made other separate contributions to supporting resident events.

Resident agreement to the proposed boundary was confirmed at the EVTRA AGM on 2 July 2013.

Business agreement to the proposed boundary was confirmed at a meeting of the business members steering committee on 24 July 2013.

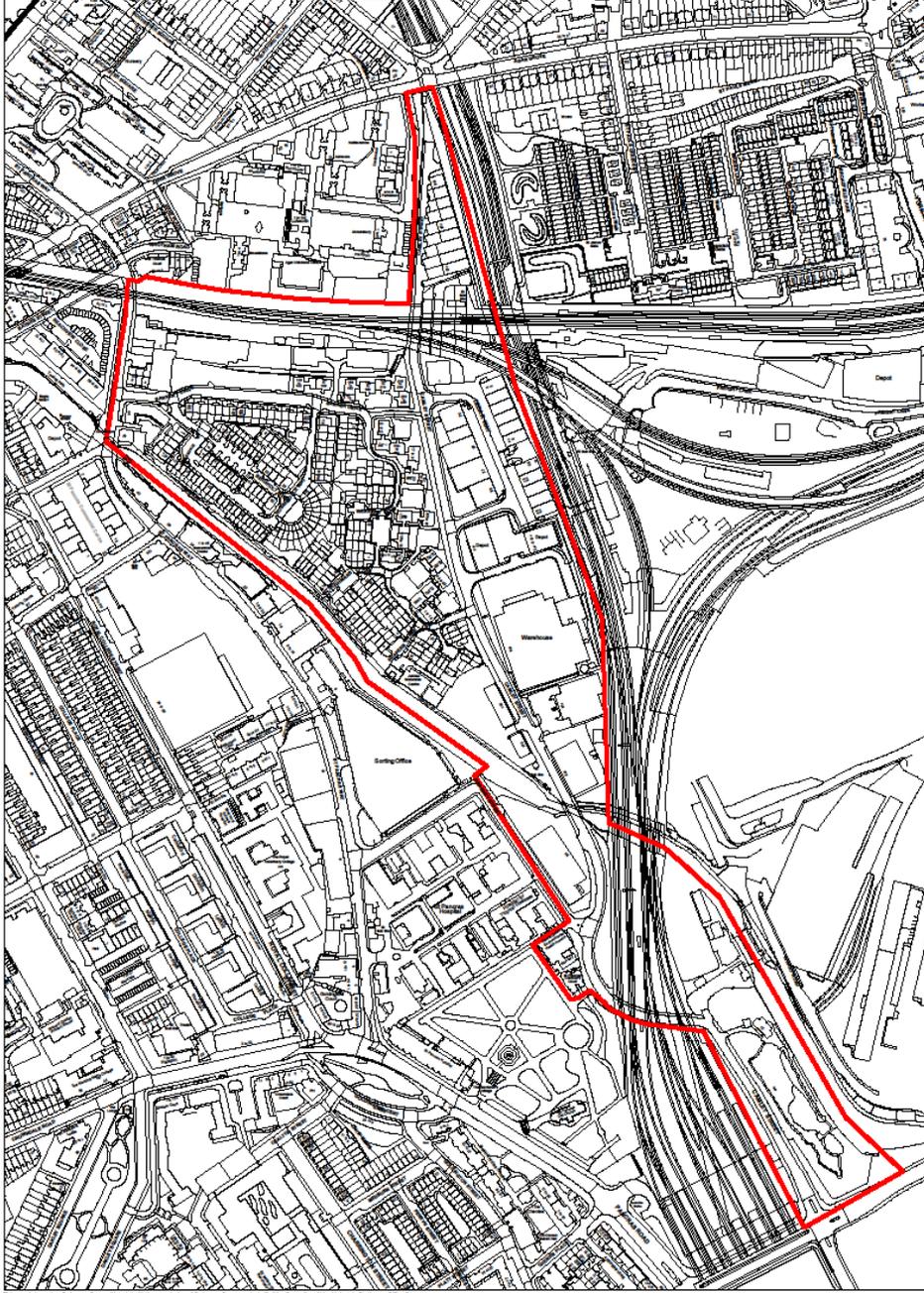
The proposed forum area includes land designated for use by HS2, some temporarily during construction and some permanently to accommodate the HS1-HS2 link line. Although HS2 is part of the national transport strategy and therefore outwith the remit of Neighbourhood Planning the fact that the HS2 land falls within the 'natural' boundary of our area meant that, rather than exclude it for now (and have a less natural boundary) and then re-apply to include it when the HS2 project was finished, we have decided to include it from the start.

## **6 BOUNDARY MAP**

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The figure below is a low resolution copy of the detailed map file attached with this application.

## Camley Street Neighbourhood Area



## Constitution

*The constitution of the Camley Street Neighbourhood Forum*

### 1 NAME OF THE FORUM

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- a. The "Camley Street Neighbourhood Forum" (hereafter 'the Forum').

### 2 AREA COVERED BY THE FORUM

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- b. The area covered by the Forum (hereafter 'the Area') is as defined in the document "Camley Street Neighbourhood Forum Area".

### 3 PURPOSE OF THE FORUM

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The purpose of the Forum is:

- a. To promote the social, economic and environmental well-being of the Area.
- b. To draw up and maintain a Neighbourhood Development Plan for the Area.

### 4 MEMBERSHIP OF THE FORUM

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There are four classes of membership

- a. Resident membership is open to all individuals who live in the Area. Each resident member has one vote and may stand for office.
- b. Enterprise membership is open to all individuals and formally constituted organisations who work in the Area. Each enterprise member has one vote and may stand for office.
- c. Councillor membership is open to elected members of the London Borough of Camden for Wards overlapping the Area. Each councillor member has one vote but cannot stand for office.
- d. Associate membership is open to all. Associate members cannot vote or stand for office.

### 5 MANAGEMENT OF THE FORUM

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- a. An Annual General Meeting will be held each spring and will be open to all Forum members. At least thirty days' prior notice will be given by email, during which time Forum members eligible to vote may propose motions for discussion or candidates for election
- b. The Annual General Meeting will elect a Managing Committee consisting of up to

twelve members including the Chair, the Secretary and the Treasurer (hereafter ‘the Officers’). At least one of the Officers must be a Resident member and at least one an Enterprise member

- c. A Special General Meeting can be called by a majority of the Managing Committee or by a petition signed by twenty-five or more members eligible to vote. The Secretary will then arrange a Special General Meeting within thirty days and notify all members by email.
- d. The Managing Committee may invite any individual or organisation to take part in its meetings without voting.
- e. The Managing Committee may set scales of fees for Forum membership.
- f. The Managing Committee shall publicise contact details by which individuals and organisations can become Forum members.
- g. The Managing Committee shall maintain contact details of Forum members.
- h. The Managing Committee shall maintain up-to-date accounts and publish annually reports, accounts and budgets.
- i. The Managing Committee shall determine the distribution of any residual assets, which shall be to organisations in the voluntary and community sector, if the Forum is to be wound up.
- j. The Managing Committee may act to fulfil the purpose of the Forum in any lawful ways.

## **6 APPROVING THE NEIGHBOURHOOD DEVELOPMENT PLAN**

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- a. The Managing Committee must approve the Neighbourhood Development Plan by two-thirds majority prior to it being sent for referendum.
- b. The Officers must approve the Neighbourhood Development Plan unanimously prior to it being sent for referendum.

## **7 OPERATION**

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- a. The financial transactions of the Forum shall require two signatories who are not related to each other and who include one of the Officers.
- b. Quorum
  - i. All Management Committee meetings must have at least five elected committee members present, including at least one of the Officers, one Resident member and one Enterprise member.
  - ii. All Annual General Meetings and Special General Meetings must have at least fifteen voting members present.
- c. The Forum shall not be affiliated to any political or religious organisation.

- d. Individuals contributing to Forum deliberations shall declare any conflicts of interest prior to speaking.
- e. Decisions shall be made by simple majorities of the individuals voting. A casting vote shall be held by the Chair if the Chair is participating in voting, the Secretary if the Secretary is participating without the participation of the Chair, and the Treasurer if the Treasurer is participating without the participation of the Chair and the Secretary. All electronic polls shall permit votes to be cast for at least three days.
- f. Constitutional changes may only be made at an Annual or Special General Meeting and must be approved by two-thirds majority.
- g. The Forum shall observe the principles of the good governance code for the voluntary and community sector at <http://www.ncvo-vol.org.uk> developed by the National Council for Voluntary Organisations.

|-- end --|

# Forum Application

*Application for designation of “Camley Street Neighbourhood Forum” as a neighbourhood forum as described in the neighbourhood planning (general) regulations 2012.*

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## **1 JUSTIFICATION FOR THE FORUM**

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We believe the Camley Street Area has characteristics that make it suitable for having a neighbourhood forum. In particular:

### **1.1 IT HAS NATURAL BOUNDARIES**

The area is an hour-glass shape bounded almost entirely by existing features of the built landscape – to the north by railway lines, to the east and west by Regents Canal and railway lines, and to the south by Goods Way and Pancras Road.

### **1.2 IT IS AN AREA OF MIXED USE**

- Residential - owner occupied houses and apartments, private rented, social housing and sheltered accommodation.
- Business - small businesses (fashion, photography, garages, etc.), medium size businesses (Alara Wholefoods, IMS of Smithfield, Marigold Health Foods, Bookers, etc.) and national and multinational businesses (Network Rail, Hewlett Packard, DPD La Poste, etc.)
- Institutions and places of social amenity – Barker Drive Gardens, St Pancras Gardens, historic St Pancras Old Church and Churchyard, Regents Canal and St Pancras Basin, Camley Street Nature Park, Camden Garden Centre (a non-profit social enterprise).

### **1.3 IT HAS A TRADITION OF RESIDENTS AND BUSINESSES BEING ACTIVELY INVOLVED IN ITS IMPROVEMENT**

The Elm Village Tenants and Residents Association (EVTRA) has been continuously active since the area was rebuilt in the mid-1980s. It has an active web site <http://www.evtra.org.uk> and Twitter account <http://www.twitter.com/ElmVillage>, an twice-yearly newsletter, an active garden society, and an active neighbourhood watch group with email 'alert' lists and regular contact with Metropolitan Police officers and Camden council officials. Businesses in Camley Street and Cedar Way have been actively involved in initiating and supporting local environmental projects and improvements. Many of these businesses support the Camley Street Business Network.

### **1.4 IT IS UNDER SIGNIFICANT DEVELOPMENT PRESSURE**

The work on King's Cross Station is nearing completion and the development of King's Cross Central is underway. Also just to the south the Francis Crick Institute is under construction and to the north the HS2 link line is planned. These developments and more, combined with a location midway between Camden Town and King's Cross, will increase the pressure for development in the Camley Street Area.

### **1.5 IT OFFERS OPPORTUNITIES FOR REGENERATION**

The adjacent King's Cross Central area will need the many small businesses in the Camley Street Area that are keen to share in the growing economy which development is likely to

bring. For this to happen there will need to be co-ordinated planning and funding (of routes, crossings, signage and transport) together with more effective collaboration of resident and business groups. Though there have been efforts to brighten up individual buildings, investments in improvements will be much more effective if the energy and enthusiasm of individual building owners can be harnessed to develop a shared plan.

### **1.6 IT HAS MIXED TRANSPORT AND TRAFFIC MANAGEMENT ARRANGEMENTS**

Sustained and co-ordinated effort is needed to ensure that traffic management arrangements meet the requirements of all users, including local residents, businesses, visitors and commuters.

Existing, proposed and absent traffic flows include:

- Cycleway routes to Agar Grove and Kentish Town in the north, Camden Town in the west, Regents canal in the centre and King's Cross and St Pancras in the south.
- Road access for Network Rail maintenance and construction traffic to the London Overground line.
- The HS1-HS2 railway link line to be constructed parallel to the existing London Overground line.
- HGV and other vehicular traffic to the businesses on the eastern side of Camley Street.
- Footpaths, footbridges and walkway links to the Maiden Lane estate, Agar Grove and Kentish Town in the north, the Regents Canal in the centre and to King's Cross and St Pancras in the south.
- Residential and business street parking.
- A complete absence of any public transport.

Some steps have been taken in the right direction but there remains much to improve.

### **1.7 IT IS THE SUBJECT OF A PLACE-SHAPING EXERCISE**

Prior work by the London Borough of Camden has laid useful ground on which to build. Parts of our neighbourhood plan might be constructed just by adding detail to the Place Shaping exercise after consultation with residents and businesses.

### **1.8 IT IS AN AREA OF OPPORTUNITY BUT ALSO ONE OF DEPRIVATION**

Drug dealers regularly frequent the corner of Barker Drive and Camley Street, the footpath connecting Rossendale Way and Bergholt Mews, and the canal towpath.

After sunset, Camley Street is a dark, deserted and sometimes intimidating place to be which does not reflect its importance as an important cycle and pedestrian link between the north of the borough and the new developments and existing city to the south.

## 2 STATUS OF THE FORUM

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### 2.1 PURPOSE

We are forming an organisation that is a 'relevant body' for the purposes of section 61G(2) of the Town and Country Planning Act 1990 in that it is capable of being designated as a neighbourhood forum.

The purpose of this forum is to promote and improve the social, economic, and environmental well-being of the Camley Street area.

### 2.2 CONSTITUTION

The forum's constitution is defined in the document "*Camley Street Neighbourhood Forum Constitution*" and specifies a purpose and membership that conform with section 61F(5) of the Town and Country Planning Act 1990. At this stage do not wish to constrain the purpose of the Neighbourhood Forum in ways beyond those in the Localism Act of 2011.

### 2.3 GEOGRAPHIC AREA

The area of the Forum is defined in the document "*Camley Street Neighbourhood Forum Area*"

### 2.4 MEMBERS & SUPPORTERS

We have attracted a range of residents, community organisations and businesses to support us many of whom are already involved with significant community and/or business activities.

We also have the support of Camden Councillors Peter Brayshaw, Samata Khatoon and Roger Robinson.

All residents and businesses will be re-invited to get involved in the next phase of the Forum's work.

### 2.5 ORGANISATION

An acting steering group has been formed from the volunteers working on the formation of the Forum.

The Chair, Secretary and Treasurer of the acting steering group are:

- Peter McGinty, Chair (Resident member)
- David Powell, Secretary (Resident member)
- John Hayes, Treasurer (Enterprise member)

Working parties on Strategy, Planning and Communications have already started work on some of the deliverables of the Forum.

A new steering group will be elected within 90 days of the formal recognition of the Forum.

## 2.6 CONTACT DETAILS

Requests for contact should be directed to Peter McGinty, Chairman of the Camley Street Neighbourhood Forum, who can be contacted via email at: [Peter.McGinty@CamleyStreet.org.uk](mailto:Peter.McGinty@CamleyStreet.org.uk)

## 2.7 ENGAGING WITH THE LOCAL COMMUNITY

Our engagement activities are targeted at the individuals who live and work in the Forum Area and the businesses and community organisations that represent them.

During 2012 and 2013 we held a number of events aimed at increasing our visibility and membership amongst residents and businesses within the forum area including:

- November 2012 – Invited all residents and business to a ‘neighbourhood party’ to hear about the proposed neighbourhood forum and to help set it up.
- December 2012 – A Christmas Carol event
- February 2013 – A Wassailing party
- June 2013 – A ‘big lunch’ event
- September 2013 – A ‘harvest festival’

These outreach efforts have helped to expand our membership from nil in mid-2012 to 60+ now and we plan more events in future.

News, updates, activities information and notes of previous meetings are publicised on our website at <http://www.CamleyStreetNeighbourhoodForum.org.uk> (mirrored at <http://www.camleystreet.org.uk> and <http://www.csnf.org.uk>). We also have an email distribution system to broadcast news promptly and have at least twice delivered leaflets to every address within the forum area.

Future community engagement activities aimed at increasing membership and involvement will include:

- Organising email and letterbox surveys to see what people would like.
- Holding ‘virtual’ meetings on-line to encourage those who are uncomfortable in formal meetings to join in.
- Adding a social dimension to meetings to encourage attendance.
- Identifying ‘quick win’ projects that will help sustain interest.

The physical size of the Camley Street Neighbourhood Forum Area means it is feasible to consider delivering leaflets to every resident and business whenever this is justified.

Our aim is to reach out to all those who live and work in the forum area and involve them in the creation of the neighbourhood plan, ideally by their direct participation in the plan creation process. At the very least we will be making sure that everybody is aware of what is being done, their voice is being heard and their views are being included within the construction of the plan.

## **2.8 FORMULATING THE NEIGHBOURHOOD PLAN**

Residents and businesses have formed a joint team to tackle local issues and will be establishing processes for resident and business engagement which will enable the production of an agreed plan for this neighbourhood in accordance with the new legal requirements.

We are virtually next-door-neighbours to UCL, University of the Arts Central St Martins and other world-class academic institutions. We already have associate members from these communities working with us and plan to engage more.

We will work closely with nearby neighbourhood forums and other organisations on matters of mutual interest. In the immediate vicinity we border Somers Town Neighbourhood Forum, King's Cross Development Forum, and the proposed Kings Cross Neighbourhood Forum. Bloomsbury, Fitzrovia, Kentish Town and Highgate are also areas we follow with interest.

## **3 THE CAMLEY STREET NEIGHBOURHOOD PLAN**

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Our Forum has as its main goal the development of a Neighbourhood Plan for public consultation and referendum within the next two or three years.

Though we regard it as premature to put forward detailed expectations for the plan, we envisage that it will examine the following aspects of "sustainable development":

### **3.1 ECONOMIC DEVELOPMENT & GROWTH**

We recognise the need for strong economic development and growth to underpin all work and that this must happen in a way that supports and encourages the healthy lives of the individuals who live and work in the Camley Street Area.

The neighbourhood plan will seek to promote ways in which the existing economic base of small local businesses, medium-sized enterprises and large corporations can be encouraged to stay and grow; start-ups generated by local graduates can be offered affordable workspace; social, community and employer-owned enterprises can be strengthened; and larger businesses can be encouraged to play an active role in training and recruitment from the boroughs economically less active groups.

### **3.2 CONSERVATION**

It is essential we retain and preserve quality buildings and features from the Forum Area's heritage past - St Pancras Gardens (adjacent to St Pancras Old Church), Regents Canal and the various railway structures - and present these in a sympathetic modern context. There is ample evidence of the economic benefits of doing so over and above the contribution to enhancing the aesthetic environment.

The fact that the residencies in Rosendale Way, constructed in 1984/5, are included in Pevsner's "Buildings of England" published by Yale University Press is evidence that this is eminently achievable.

### **3.3 ENVIRONMENT AND BIODIVERSITY**

The Camley Street Natural Park is a significant resource but apart from this we are in danger of neglecting the substantial biodiversity of the rest of the Forum Area, particularly the plant and animal species associated with the canal and railway embankments.

Green corridors and spaces are important for species diversity, beauty and shading, and general environmental well-being. Unfortunately some existing spaces are underused or even unused and contribute to the neglected look of some parts of the area. We intend to encourage the use of small pockets of land for 'mini-parks' and 'mini-gardens' in a way which nurtures the presence of natural growth in the Area.

The London area currently breaches the air quality targets required by the World Health Organisation and EU and trees have especial value in helping to address this: they catch pollutant particles from traffic fumes and atmospheric dust, provide oxygen and absorb carbon dioxide. Progress has already been made with the planting of apple trees in the unused strips of land around the industrial units but much more still needs to be done.

### **3.4 AMENITY MANAGEMENT**

Apart from the Constitution public house and the Jubilee water Sports Centre/Frank Barnes School (only accessible out of school hours/weeks) there is no community space for meetings or other community gatherings.

There are no shops within the Forum Area.

### **3.5 TRAFFIC & TRANSPORT MANAGEMENT**

The proposed forum area includes land designated for use by HS2, some temporarily during construction and some permanently to accommodate the HS1-HS2 link line. In addition, for the duration of the HS2 construction project, there will be significant increases to the traffic on Camley Street. Although HS2 is part of the national transport strategy and therefore outwith the remit of this forum and Neighbourhood Planning the duration and magnitude of the construction project means that consideration of its short and long term effects will be unavoidable.

The Camley Street Area should be a place where people want to walk. The impediments to this are the unwelcoming nature and occasional insecurity of the existing pedestrian routes, particularly Camley Street itself. Remedying this will place emphasis on developing a congenial environment for residents and visitors, rather than simply providing a walkway.

The proposed links across the canal adjacent to St Pancras Locks present an opportunity for integrating access to Camley Street Natural Park, St Pancras Church and Churchyard and potential developments in what is now St Pancras Hospital.

Canal-side interactions with the new 103 Camley Street mixed-use development will mean that the canal itself will come under increasing pressure as the consequent increase in pedestrians coincides with it becoming an ever more popular cycle route. This will present us with the challenge of maintaining the amenity and simple beauty of the canal side walkway as well as a productive social space.

### **3.6 ACCOMMODATION BALANCE**

Increasing the quantity and quality of affordable accommodation in the Borough is still a priority for Camden and the plan will take this into account.

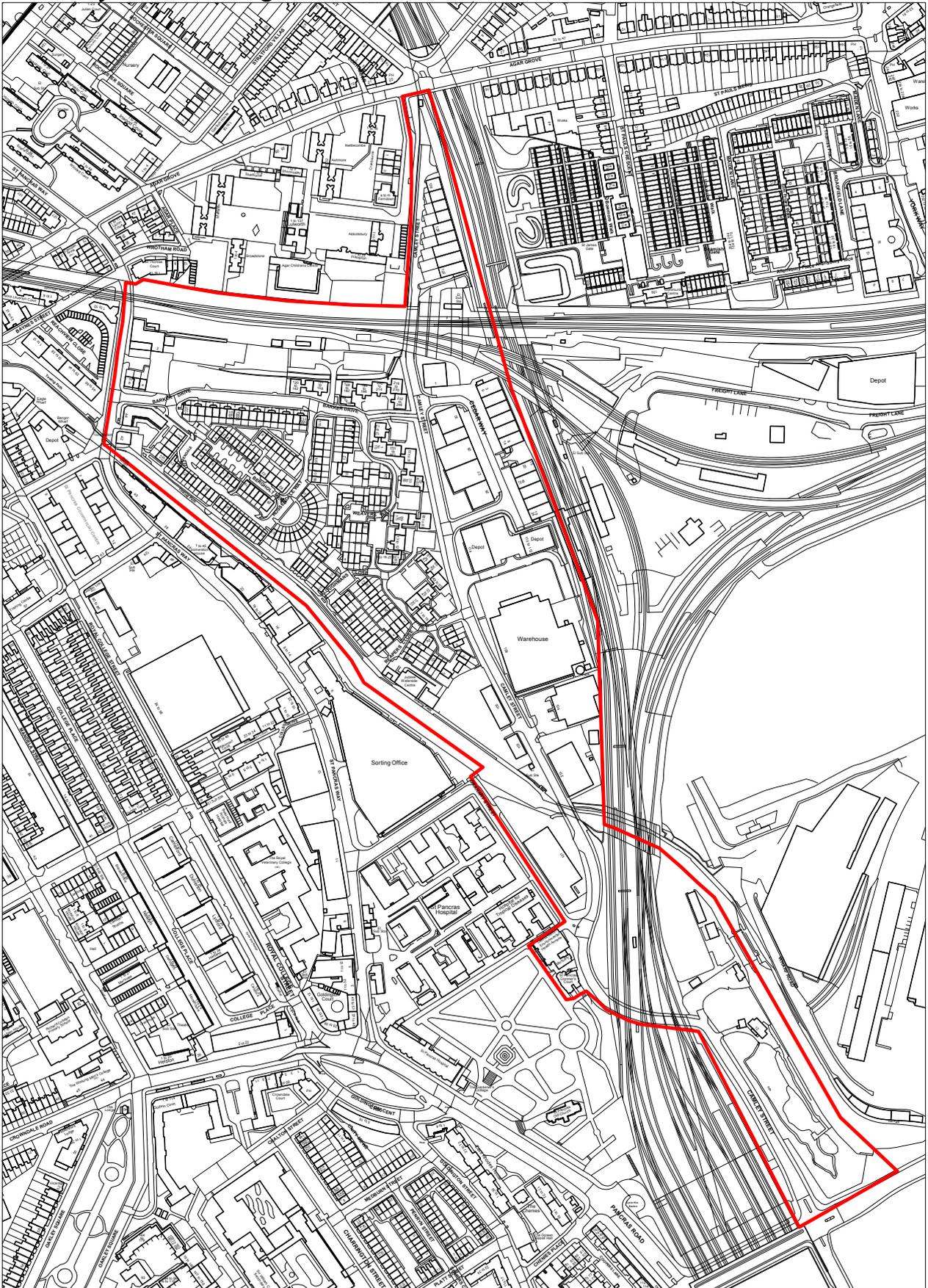
### **3.7 SAFETY AND SECURITY**

The Camley Street Area should be a place where people feel that their person and property is safe and secure at all times – in their homes, their workplaces and all shared spaces.

Improving this sense of safety and security will be an important objective of our plan.

|-- end --|

### Camley Street Neighbourhood Area



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## **Application for Redesignation as a Neighbourhood Forum under the Provisions of the Localism Act 2011**

### **Camley Street Neighbourhood Forum**

**Contacts: Alex Smith, Chair, CSNF, John Richmond, Secretary, CSNF, both at [secretary@camleystreet.org.uk](mailto:secretary@camleystreet.org.uk)**

#### **Introduction**

Camley Street Neighbourhood Forum applied to Camden Council for designation as a neighbourhood forum in October 2013. On 21 February 2014 Camden approved the designation of the Neighbourhood Area and Neighbourhood Forum. We, the residents and members of the business community in the Neighbourhood Area, hereby apply for redesignation as a Neighbourhood Forum under the Provisions of the Localism Act 2011, as from 21 February 2019.

#### **Name of Forum**

The name of the Forum now applying for redesignation as a Neighbourhood Forum under the Provisions of the Localism Act 2011 is Camley Street Neighbourhood Forum.

#### **The Neighbourhood Area**

The Camley Street Neighbourhood Area appears as a map on page 4 of the draft Neighbourhood Plan (see below), which accompanies this document. The Forum's website is at <http://camleystreet.org.uk>. The draft Plan, together with several associated documents, may also be consulted there.

#### **Constitution**

The constitution of the Camley Street Neighbourhood Forum accompanies this document.

#### **Statement of Purpose of the Forum; Development of the Neighbourhood Plan**

The Forum's draft Neighbourhood Plan proposes to transform the Neighbourhood Area adjoining the Regent's Canal and located between Camden Town and King's Cross into a mixed community providing: a range of industrial and commercial space; several hundred new dwellings; and new social and community infrastructure. The new industrial and commercial space will satisfy the needs of the current business occupiers, create additional space for new businesses, safeguard existing jobs and create new ones. The new dwellings will include as much affordable rented housing (rents set at one third of average St Pancras and Somers Town ward household income) as would be compatible with the financial viability of the Plan. The new community facilities and services

will support the existing and new industrial, commercial and residential communities. Development will utilise innovative and eco-friendly building design and technology, with green infrastructure integrated throughout.

The proposals, if adopted, will greatly enhance the quality of the Neighbourhood Area as a place to live and work.

Thus it should be clear that the Forum is established for the express purpose of promoting and improving the social, economic and environmental well-being of an area that consists of the Neighbourhood Area concerned.

The Forum has recently concluded a six-week statutory consultation on its draft Plan. The consultation ended on 13 January 2019. It yielded responses from 113 people and organisations. Of these, 38 were from residents of Elm Village, 62 from employees of the businesses, and 13 from interested organisations (including the London Borough of Camden and the Mayor of London). During the period of the consultation, when the draft Plan was on display, there were four staffed sessions (three at 5 Pancras Square and one at the Camden Garden Centre), when members of the Forum were available to talk to enquirers.

The Forum and the planning consultant advising it are now considering these responses, and will be making improvements to the Plan on the basis of them. The final Plan will then go to Camden Council, to be considered by an independent examiner. If the examiner approves the Plan, it will then go to a referendum at which all those on the electoral roll at addresses within the Plan area will be entitled to vote.

### **The Forum's Committee**

The Forum's committee has 26 members:

Alex Smith, Alara Wholefoods (Chair)  
John Richmond, Elm Village resident (Secretary)  
Paul Tomlinson (Local ward councillor)  
Helen Savva, Elm Village resident  
John Hayes, Daily Fish (Treasurer)  
Mario Raggio (IMS of Smithfield)  
Tony Meadows (IMS of Smithfield)  
Caroline Hogan (IMS of Smithfield)  
Joanne Thompson (IMS of Smithfield)  
Stuart Waller (Daily Fish)  
Ahmed Waza (Richmond Laundries)  
Yasin Waza (Richmond Laundries)  
Christian Spencer-Davies (A Models)  
Fabio Poupinha (Packshot)  
Tejinder Bahra (Packshot)  
Nick Burcombe (Booker)  
Eve Dain (Fashot)  
Maura Ryan-Dommergue (Elm Village resident)

Duncan Gregory (Elm Village resident)  
Edward Lee (Elm Village resident)  
Deedee Levine (Elm Village Resident)  
Peter McGinty (Elm Village resident)  
Maura Ryan-Dommergue (Elm Village resident)  
David Royston-Lee (Elm Village resident)  
Keith Olohan (Elm Village resident)  
Farra Pedley (Elm Village resident)

### **Inclusivity and Communication**

Membership of the Forum is open to all residents on the Elm Village estate, to the businesses adjacent to Elm Village, notably The Constitution pub and the Camden Garden Centre, and to the large group of businesses on the Camley Street/Cedar Way industrial estate. All these people and organisations have been kept in regular touch with the development of the Neighbourhood Plan over the last five years, either by paper mailing, email or at face-to-face meetings; all have been contacted about the six-week statutory consultation. The paper mailings have gone to the 600+ addresses on Elm Village, and – through the leaders of the businesses on the industrial estate – to the workers there. The Forum also holds a list of more than 200 email addresses of people who wish to be informed in that way. The Forum’s website is another means by which people can stay in touch.

During an initial survey in 2015 seeking the views of residents and businesses on the possible development of a Neighbourhood Plan, about 60% of the 600+ residents and about 60% of those employed in the businesses responded to the survey.

All residents and businesses are invited to the Forum’s AGM, held in the spring of each year. There is also a harvest party, hosted by Alara Foods and held in late September, to which everyone is invited and at which news of the development of the Plan has been communicated.

It should be clear from the number of responses to the draft Plan (see above) that the business and residential communities are well aware of the activities of the Forum.

### **Supporting Signatures**

Accompanying this document is a list containing supporting signatures to this application, including the signatures of two Camden councillors for the St Pancras and Somers Town ward, in which the Neighbourhood Area lies.

**Alex Smith, Chair, CSNF**  
**John Richmond, Secretary, CSNF**  
**February 2019**



June 16<sup>th</sup> 6.00pm - 8.00pm

Camley Street Natural Park

With Camden Council now under more pressure than ever to sell the land it owns on Camley Street to the highest bidder, it's obvious that there are going to be radical changes to our neighbourhood.

Rather than just wait for events to overtake us and planning applications from speculative developers to land on our doorsteps unannounced (again!), we want to take control of the situation – and our future.

So far in 2014 and 2015, we've succeeded in becoming a legally designated neighbourhood forum, organised several public events, and held meetings with Camden Councillors and planning officers.

We've now appointed Plan Projects Ltd to help us create and develop a neighbourhood plan and have it formally recognised by Camden as part of the planning regulations for our neighbourhood. As a first step in this process we've organised a public meeting on the 16th to start gathering everyone's views and opinions.

At the same time we'll be holding the 2015 AGM of the Camley Street Neighbourhood Forum – see details on [www.CamleyStreet.org.uk](http://www.CamleyStreet.org.uk)

**Please join us on the 16th and share your vision of what the future of the Camley Street area should be, find out about neighbourhood planning, meet the team, maybe even join the team, and start having a bigger say about what happens in our neighbourhood.**

**Be there!**

**Peter, David, Alex, Christian, John - and the rest of us**



# CAMLEY STREET

# NEIGHBOURHOOD PLAN

# RESIDENT QUESTIONNAIRE

## WHAT IS A NEIGHBOURHOOD PLAN?

In April 2012, Parliament introduced the Localism Act. This contained new laws giving local communities a far greater say in how their areas develop. It's called Neighbourhood Planning and it's a way for communities to influence the future of the places in which they live or work.

This means groups of people living or working within an area can produce a strategy for how their area develops, which will then be recognised alongside Council plans, the document produced is called a Neighbourhood Plan.

A Forum of interested local people (residents, business owners, people who work in the area etc) who care about the neighbourhood has been created to represent Camley Street and all the streets within the Neighbourhood Plan boundary.

**A Neighbourhood Forum must be representative of the community's diverse interests and the Forum would like to work with as many people as possible in the area to agree principles for how we want our neighbourhood to grow.**

## DO YOU HAVE VIEWS ON HOW CAMLEY STREET COULD BECOME A BETTER AREA IN WHICH TO LIVE AND DO BUSINESS?

If you're interested in being part of the Neighbourhood Forum and/or would like to voice your opinion about the Camley Street area then **please fill out a questionnaire attached.**

The questionnaire has been sent around the entire neighbourhood and aims to gather everyone's view on a range of different issues and opportunities that Camley Street will be facing over the coming years.

**GATHERING EVERYONE'S OPINION IS EXTREMELY IMPORTANT!**

# *Camley Street and Elm Village Neighbourhood Plan - Resident Questionnaire*

Dear Neighbour

We are consulting all residents about what should be included in the emerging Camley Street Neighbourhood Plan.

### **What's happening?**

Camley Street includes council-owned land that has been earmarked for re-development, which normally means selling it to a big commercial developer interested only in maximising their own profit. That means that unless we get the right protection in place now, it's highly likely the end result will be unappealing high density housing (as has already happened on St Pancras Way) with a lack of green spaces and no sense of community or neighbourliness – in other words, not a very attractive place to live in or near to.

### Who are we?

We are a group of individuals who either live or work in the Camley Street and Elm Village neighbourhood. We formed the Camley Street Neighbourhood Forum because we share a common purpose and objective: To **make our neighbourhood the nicest possible place it can be** - to make it an area that's **economically vibrant, socially connected, and generally the greenest and safest** place to live and work.

### What can be done?

We are proposing to create a legally binding Camley Street Neighbourhood Plan that will define the type of neighbourhood we want it to be and strengthen the planning rules about what can, and what cannot, be built there. We're also working on establishing a Community Land Trust to lead the redevelopment of Camley Street that would be owned and controlled by the people who live and work within the Camley Street Neighbourhood Forum Area - in others words, you and me!

*YOUR opinions are valuable and WILL help define the Camley Street Neighbourhood Plan - it's YOUR community and village, PLEASE let us know what you think.*

We are accepting responses until [date=xx/xx/xx] on [www.camleystreet.org.uk](http://www.camleystreet.org.uk) or via a paper copy posted through the letterbox of 81 Rosendale Way.

Your answers will be strictly confidential. We don't even ask for your name.

### **Thank you!**

### What happens next?

You can also meet us on [date=xx/xx/xx] or [date=xx/xx/xx] at street stall drop-ins we'll be organising – watch out for the leaflet.

We won't respond to you individually but the anonymised results of this survey will be published on [www.camleystreet.org.uk](http://www.camleystreet.org.uk) and we hope to see you at future events and meetings.

## Questionnaire

We realise that this does take some time and appreciate you giving it.

Please note that there is a requirement that we gather information 'About You' for us to use the information you give in the Questionnaire.

### About You

This information is kept completely anonymous and will be detached from the questionnaire. It is only collected to enable us to see if we are collecting information from all sections of the community in the Camley Street area. We won't use it for anything else and we won't share it outside of the project team.

1. Please provide your postcode

2. What is the tenure of your home? Do you:

Own it outright

Own it with a mortgage

Rent from a private landlord

Rent from council/social housing

Other (please specify)

If your response is 'Other', please specify:

3. How long have you lived in the area?

Less than 1 year

Between 1 and 2 years

Between 2 and 5 years

Between 5 and 10 years

Between 10 and 20 years

More than 20 years

4. Are you:

Female

Male

Other

5. How many people currently live in your home (including yourself)?

Adults

Children

6. How many bedrooms does your home have?

7. How old are you?

Under 15 years old

16-24 years old

25-34 years old

35-49 years old

50-64 years old

65-74 years old

75 years old or older

8. How do you describe your ethnic origin?

Asian or  
Asian British

Black or  
Black British

Mixed  
Background

White or  
White British

Other ethnic  
group

If your response is 'Other ethnic group', please specify:

9. Religion or belief: Are you or do you have...

Atheist/no  
religious belief

Buddhist

Christian

Hindu

Jewish

Muslim

Sikh

Other  
Religion

Please specify, if you wish:

10. Do you consider yourself to be disabled?

Yes

No

11. Would you like to be kept informed about progress in developing the Neighbourhood Plan? (optional)

Name

Email address

Phone number

## Main Questionnaire

Thinking about the Camley Street and Elm Village neighbourhood area please answer the following questions:

### Environmental quality

To what extent do you agree with the following statements:

1. *'I am satisfied with the cleanliness of the area'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

2. *'I am satisfied with the physical appearance of the area'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

3. Do you have any comments you'd like to make about environmental quality?

### Public safety

To what extent do you agree with the following statements:

4. *'Parents should feel confident letting their children play in the streets around their homes'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

5. *'I feel safe walking through the neighbourhood after dark'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

6. *'There is a problem with reckless driving in the area'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

7. Do you have any comments you'd like to make about public safety?

### Development

To what extent do you agree with the statement:

8. *'Camley Street's role as a place of employment is valuable, and it's important that this forms key component of any future vision'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

9. Considering the range of work that could take place in Camley Street, which of these groups do you feel is most appropriate? (feel free to tick more than one, but please express a preference with a star)

Light Industrial (similar to the type already in the area)

Offices

Shops

10. What do you think should have the greatest priority in the development of the Camley Street neighbourhood area? (feel free to tick more than one, but please express a preference with a star)

Housing

Employment (industrial and offices)

Shops

Commercial leisure (restaurants, cafes, pubs)

To what extent do you agree with the statement:

11. *'I am satisfied with the range of goods and services available in Camley Street'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

12. Do you have any comments you'd like to make about redevelopment?

Public space

To what extent do you agree with the following statements:

13. *'The Camley Street area provides residents with good green space'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

14. *'The privately owned green spaces in the Camley Street neighbourhood make up for any deficiency in public open space'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

15. Do you have any comments you'd like to make about public spaces?

Transport

16. Thinking about your daily routine, what mode of transport would you prefer to use (feel free to tick more than one, but please express a preference with a star)?

Public transport

Private car

Walking

Cycling

17. Do you have any comments you'd like to make about transport?

Housing

To what extent do you agree with the following statements:

18. *'The provision of housing that is affordable for people on average incomes in the Camley Street neighbourhood should be a priority in any future vision'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

19. *'I am satisfied with my home and do not feel the need to make any changes'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

20. In providing housing, for which of the following groups do you feel there is the most urgent need? (please select only one)

Families

People living alone

Older people (65+)

Couples without children

Lone parents

There is no need for more housing

21. Do you have any comments you'd like to make about Housing?

Social life

To what extent do you agree with the statement:

22. *'The Camley Street neighbourhood is a great place to socialise and meet new people'*

Strongly agree	Agree	Not sure	Disagree	Strongly disagree
<input type="checkbox"/>				

23. Are there places in the neighbourhood where people can hold community events or celebrations?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

If yes to the previous question, please list the places you are aware of...

To what extent do you agree with the statement:

24. *'Anti-social activity is a serious problem in the area'*

Strongly agree	Agree	Not sure	Disagree	Strongly disagree
<input type="checkbox"/>				

25. Do you have any comments you'd like to make about social life?

Governance

To what extent do you agree with the statement:

26. *'The community should retain a strong influence in any future vision for the neighbourhood'*

Strongly agree	Agree	Not sure	Disagree	Strongly disagree
<input type="checkbox"/>				

27. Which of these issues do you feel should be given the greatest priority in Camley Street and Elm Village Neighbourhood? Feel free to choose more than one issue, but indicate which one you feel is the most important.

<input type="checkbox"/> Public and green spaces	<input type="checkbox"/> Transport	<input type="checkbox"/> Environmental issues
<input type="checkbox"/> Public health	<input type="checkbox"/> Housing	<input type="checkbox"/> Employment

28. Do you have any comments you'd like to make about governance?

General

29. Thinking about Camley Street and the Elm Village neighbourhood as a place:

what is good about it?

and what is bad?

30. Looking forward 10 years, what sort of place would you like it to become?

31. And finally, do you have any comments about the future of the Camley Street and Elm Village neighbourhood area that you have not already made?

**Thank you (again)!**

# *Camley Street and Elm Village Neighbourhood Plan - Workers Questionnaire*

Dear Neighbour

We are consulting all residents/business owners/workers about what should be included in the emerging Camley Street Neighbourhood Plan.

## **What's happening?**

Camley Street includes council-owned land that has been earmarked for re-development, which normally means selling it to a big commercial developer interested only in maximising their own profit. That means that unless we get the right protection in place now, it's highly likely the end result will be unappealing high density housing (as has already happened on St Pancras Way) with a lack of green spaces and no sense of community or neighbourliness – in other words, not a very attractive place to live in or near to.

## Who are we?

We are a group of individuals who either live or work in the Camley Street and Elm Village neighbourhood. We formed the Camley Street Neighbourhood Forum because we share a common purpose and objective: To **make our neighbourhood the nicest possible place it can be** - to make it an area that's **economically vibrant, socially connected, and generally the greenest and safest** place to live and work.

## What can be done?

We are proposing to create a legally binding Camley Street Neighbourhood Plan that will define the type of neighbourhood we want it to be and strengthen the planning rules about what can, and what cannot, be built there. We're also working on establishing a Community Land Trust to lead the redevelopment of Camley Street that would be owned and controlled by the people who live and work within the Camley Street Neighbourhood Forum Area - in others words, you and me!

*YOUR opinions are valuable and WILL help define the Camley Street Neighbourhood Plan - it's YOUR community and village, PLEASE let us know what you think.*

We are accepting responses until [date=xx/xx/xx] on [www.camleystreet.org.uk](http://www.camleystreet.org.uk) or via a paper copy posted through the letterbox of 81 Rosendale Way.

Your answers will be strictly confidential. We don't even ask for your name.

## **Thank you!**

## What happens next?

You can also meet us on [date=xx/xx/xx] or [date=xx/xx/xx] at street stall drop-ins we'll be organising – watch out for the leaflet.

We won't respond to you individually but the anonymised results of this survey will be published on [www.camleystreet.org.uk](http://www.camleystreet.org.uk) and we hope to see you at future events and meetings.

## Questionnaire

We realise that this does take some time and appreciate you giving it.

Please note that there is a requirement that we gather information 'About You' for us to use the information you give in the Questionnaire.

### About You

This information is kept completely anonymous and will be detached from the questionnaire. It is only collected to enable us to see if we are collecting information from all sections of the community in the Camley Street area. We won't use it for anything else and we won't share it outside of the project team.

#### 1. Do you work

Part time

Full time

#### 2. How long have you worked in the area?

Less than 1 year

Less than 2 years

Less than 5 years

Less than 10 years

Less than 20 years

More than 20 years

#### 3. Are you:

Female

Male

Other

#### 4. How old are you?

16-24 years old

25-34 years old

35-49 years old

50-64 years old

65-74 years old

75 years old or older

#### 5. How do you describe your ethnic origin?

Asian or  
Asian British

Black or  
Black British

Mixed  
Background

White or  
White British

Other ethnic  
group

If your response is 'Other ethnic group', please specify:

6. Religion or belief: Are you or do you have...

Atheist/no religious belief

Buddhist

Christian

Hindu

Jewish

Muslim

Sikh

Other Religion

Please specify, if you wish:

7. Do you consider yourself to be disabled?

Yes

No

8. Would you like to be kept informed about progress in developing the Neighbourhood Plan? (optional)

Name

Email address

Phone number

## **Main Questionnaire**

Thinking about the Camley Street and Elm Village neighbourhood area please answer the following questions:

### **Life in Camley Street**

To what extent do you agree with the following statements:

1. *'The Camley Street area provides good access to green space'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

2. *'I am satisfied with the range of goods and services available in Camley Street'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

3. *'Camley Street's role as a place of employment is valuable, and it's important that this forms key component of any future vision'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

4. *'The need for housing that is affordable for people on average incomes in the Camley Street neighbourhood should be a priority in any future vision'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

5. *'The community should retain a strong influence in any future vision for the neighbourhood'*

Strongly agree

Agree

Not sure

Disagree

Strongly disagree

6. Which of these issues do you feel should be given the greatest priority in Camley Street? Feel free to choose more than one issue, but indicate which one you feel is the most important.

Public and green spaces

Transport

Environmental issues

Public health

Housing

Employment

7. Do you have any comments you'd like to make about the Camley Street area?

General

8. Thinking about Camley Street and the Elm Village neighbourhood as a place:

what is good about it?

and what is bad?

9. Looking forward 10 years, what sort of place would you like it to become?

10. Where do you live? Please provide your postcode

11. How long does it take you to travel to your place of business?

Less than 30 mins

Between 30 mins  
and 1h

Between 1hr and  
1hr 30 mins

More than  
1hr 30 mins

12. What form of transport do you take?

Public transport

Private car

Walking

Cycling

13. And finally, do you have any comments about the future of the Camley Street and Elm Village neighbourhood area that you have not already made?

**Thank you (again)!**

# Appendix 8: Autumn Party kick off event exhibition boards 2018

## Introduction

The Camley Street Neighbourhood Forum Harvest Party- 28th September 2018

Over the last four years, several hundred people from the Camley Street area have contributed to the Neighbourhood Development Plan.

The feedback has been pulled together by planning professionals and is set out in the Draft Camley Street Neighbourhood Development Plan (2018-2033). This is an important document for many, and especially for the following two groups of people:

- **Firstly**, for the Camley Street residents who want new homes which they and their children can afford, enhanced social structures and amenities, and a legally defined role in determining how their community develops over time.
- **Secondly**, for the people who work in the area, many of whom have been serving vital local needs for several decades, and who want to ensure that secure and affordable business accommodation is retained in Camley Street.

There are many other stakeholders affected by this plan for a key area in Kings Cross, not least Camden Council, which is a substantial freeholder. We believe that what we are planning for Camley Street has the opportunity to demonstrate a new sustainable model of community development.

The event, today gives you an opportunity to look at the draft document and give us your feedback, before the formal consultation.

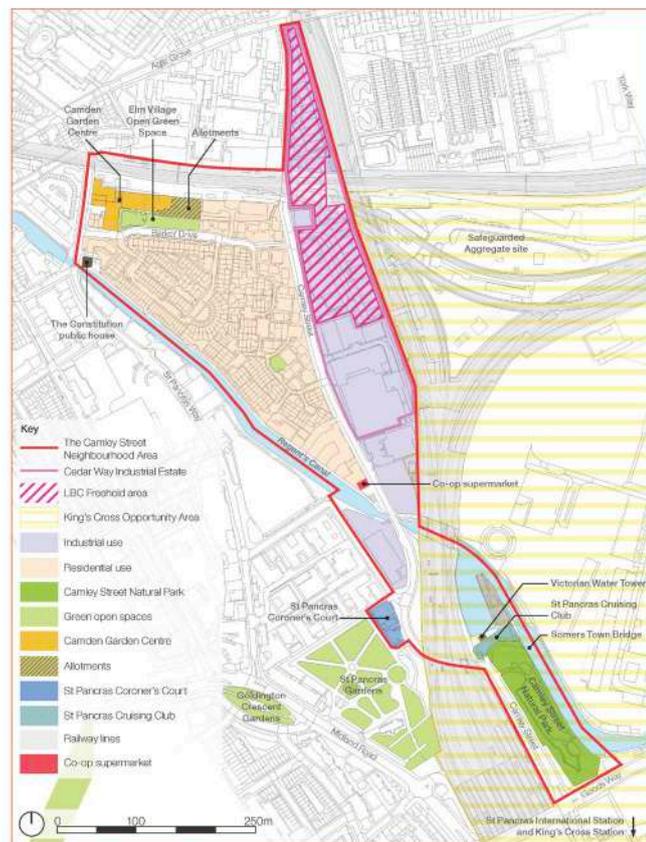
### What's next?

Following this event there will be an opportunity for residents, businesses and stakeholder to comment on the draft neighbourhood plan as part of the formal consultation process, it will be available to view on the Camley Street Forum website <http://camleystreet.org.uk> and the Camden Council website.

- There will be a series of drop in sessions across late Autumn around the local area.
- There will also be a permanent display on the industrial estate, during business hours for you to pop in and have a look.
- We are keen to get as much feedback as possible.
- Keep an eye out for the information and if you have any questions please do not hesitate to ask.

### The Camley Street Neighbourhood Area

The Neighbourhood Plan Area was formally designated by LB Camden in 2013. The Plan area is shown below.



For more information please visit <http://camleystreet.org.uk>

## Key Feedback

### In 2015 residents and local businesses were surveyed to gain their feedback on the Plan Area.

The key feedback was as follows:

#### Positive Features Include:

- People particularly value the area's central location
- People also liked the area's sense of calmness, away from the busier town centres at King's Cross and Camden Town
- The sense of community is valued
- Over half of respondents were happy with the physical appearance of the area
- As the only local supermarket, the Co-op is heavily used. Any additional housing developments in the area should have further shops, social infrastructure (i.e. health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities) and services to serve the needs of existing and new populations
- 50% of residents surveyed agreed that they have good access to green space
- 18.7% of the working population in the area work within 2km of their home
- 70% of those surveyed agreed that the area's role as an important employment hub is valuable and should be protected

Do you agree with this feedback?

Do you have any further comments?

#### Main Concerns and Issues Raised Include:

- A small number of respondents (8%) perceived general levels of connections are poor to other areas
- There were a number of concerns raised surrounding criminal and anti-social behaviour (ASB)
- Strong concerns were raised about the environmental quality. People wanted better waste services. Key areas of concern included; under the Camley Railway Bridge and at the junction of Camley Street and Barker Drive and Crofters Way.
- 29% of respondents felt there was not enough street lighting around Elm Village Open Space and under the bridge by the garages, which leads to concerns about safety and security.
- Current imbalance of locations of open spaces. Residents at Barker Drive are well served, but those at Weavers Way flats are not
- Respondents wanted a bus service along St Pancras Way and improved cycle infrastructure – over half of respondents (51%) wanted improved bus services/bus stops
- Whilst there is a strong sense of community, there is a lack of places to socialise

#### Views on Planning for the Future of the Area Include:

- People wanted the area to remain with mixed uses – 17% of respondents expressed a wish to retain employment uses and 17% of respondents expressed a wish to retain housing as the predominant use in the area
- 22% of respondents wanted better community facilities and places to socialise
- 15% of respondents wanted better access to green spaces
- Future employment uses should include light industrial workspace (37.8%), shops (34.7%) and other office uses (23.5%)
- Housing was viewed as the greatest priority for the area; 32% of those surveyed, with employment uses second, 25.9% and shops and leisure 20.5% and 20.1% respectively



Illustration: © Karakusevic Carson Architects

For more information please visit <http://camleystreet.org.uk>

# Core Objectives

## Core objective 1:

### Employment

Development will ensure the neighbourhood's continued function as a place of employment led by light industrial functions.

#### Sub-objectives

1. The Cedar Way Industrial Estate currently provides space for food production and storage, serving the needs of the restaurant and hospitality industries across London. This specialism performs a function of strategic importance at the regional scale and should be safeguarded.
2. London is witnessing a shift from traditional office accommodation to more informal workspaces, offering greater flexibility and opportunities for collaboration with other organisations; this culture is compatible with the vision for the NP Area, and such spaces will be included in any redevelopment proposals.
3. Working from home is compatible with sustainable development on account of reducing the demands on transport infrastructure at busy times and providing a human presence in the community during the day. Residential units should be designed in such a way that working from home is a realistic choice.

## Core objective 2:

### Local Community and Social Needs

Development will encourage the strong community spirit that currently exists through the provision of improved social infrastructure.

#### Sub-objective

1. To provide a 'community hub' including community spaces, convenience retailing and 'key services' to encourage a cohesive community.

## Core objective 3:

### Housing

Development will support the growth of a truly mixed community through the provision of housing of different types.

#### Sub-objectives

1. To deliver the maximum viable number of dwellings for rent at affordable levels
2. Housing suitable for families will be prioritised
3. Seeking to limit the amount of additional purpose-built student blocks in the area.



Do you agree with the Core Objectives?



For more information please visit <http://camleystreet.org.uk>

# Core Objectives

## Core objective 4:

### Sustainable Transport

Development will facilitate improvements to the public realm making walking and cycling easier and providing easier access to local centres, given the long distances from some parts of the neighbourhood.

#### Sub-objectives

1. New development should promote cycling by providing cycle storage/parking in line with Local Plan requirements.
2. To facilitate public transport
3. To promote walking by: reinforcing desire-lines through traffic-calming measures, improving road signage to improve legibility, making routes safer by encouraging street activity including: active ground-floor frontages, street lighting and other public realm improvements.
4. New residential developments should be car-free in line with Local and London Plan Policies.
5. Non-residential proposals should utilise sustainable modes of transport as far as possible and demonstrate how this has been achieved.

## Core objective 5:

### Green Infrastructure

Development will increase the range and quality of and accessibility to green spaces in the neighbourhood.

#### Sub-objectives

1. To protect and enhance existing designated green spaces at Camley Street Nature Park and Elm Village.
2. To provide a network of additional green infrastructure such as green verges, trees and small pocket and linear parks.
3. To provide and improve connections to existing green spaces outside of the Neighbourhood Plan Area boundary.
4. To promote biodiversity.



Do you agree with the Core Objectives?

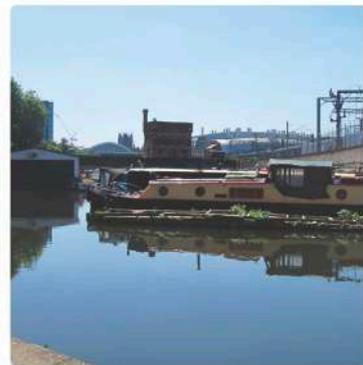
## Core objective 6:

### Design Quality

Development will preserve and enhance existing positive features in the local area including designated and locally designated heritage assets and views and should maximise opportunities to enhance accessibility and legibility throughout the Plan area, in particular improving the experience for pedestrians and cyclists with regards to safety and comfort.

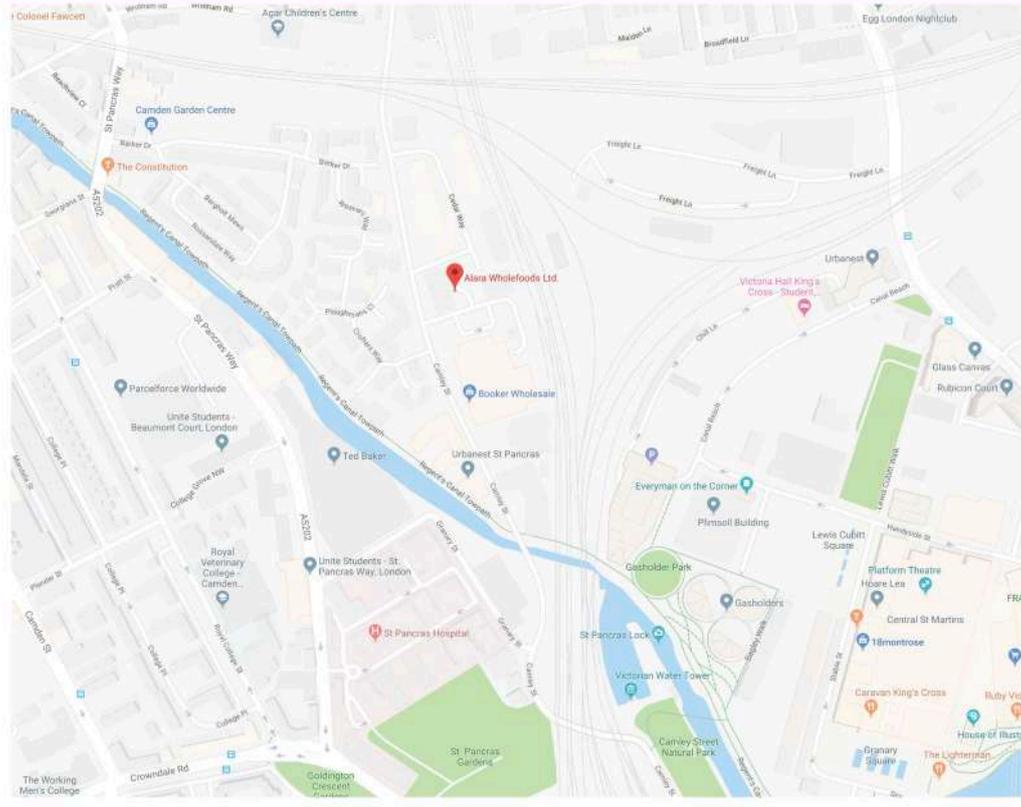
#### Sub-objectives

1. New development should preserve and enhance existing heritage assets and notable views within the Plan Area.
2. Redevelopment proposals for the area should look to improve connectivity through the area, in particular creating new accessible links to the Canal via east/west routes.
3. The current green infrastructure network should be enhanced through informal planting opportunities and wayfinding improved through design measures such as: well designed signage, street furniture and lighting.
4. Any new residential development proposals should be of the highest quality and be accessible to all.
5. To promote sustainable design standards throughout the area including climate change mitigation.



For more information please visit <http://camleystreet.org.uk>

# Where do you live? (put a dot on the map or next to the street name)



<b>Barker Drive</b>	
<b>Berghot Mews</b>	
<b>Camley Street</b>	
<b>Cedar Way</b>	
<b>Crofters Way</b>	
<b>Ploughmans Close</b>	
<b>Weavers Way</b>	
<b>Rossendale Way</b>	
<b>Other</b>	

For more information please visit <http://camleystreet.org.uk>

## Camley Street Draft Neighbourhood Development Plan Consultation - Winter 2018/19

### Introduction

Over the last four years, several hundred people from the Camley Street area have contributed to the Neighbourhood Development Plan.

The feedback has been pulled together by planning professionals and is set out in the Draft Camley Street Development Plan (2018-2033). This is an important document for many, and especially for two groups of people.

Firstly, for the Camley Street residents who want new homes which they and their children can afford, enhanced social structures and amenities, and a legally defined role in determining how their community develops over time.

Secondly, for the people who work in the area, many of whom have been serving vital local needs for several decades, and who want to ensure that secure and affordable business accommodation is retained in Camley Street.

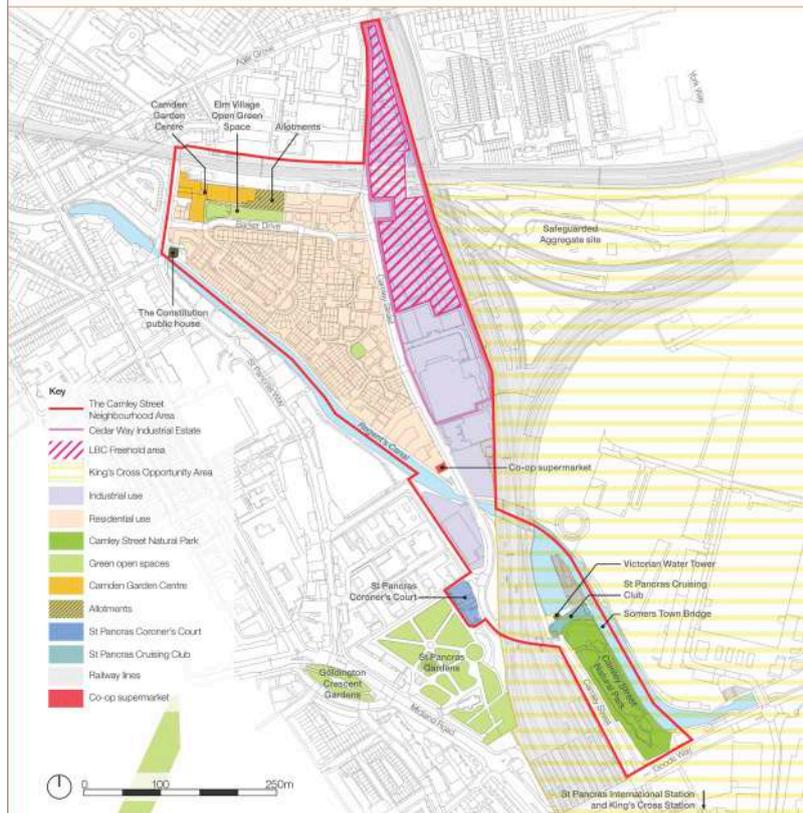
There are many other stakeholders affected by this plan for a key area in Kings Cross, not least Camden Council, which is a substantial freeholder. We believe that what we are planning for Camley Street has the opportunity to demonstrate a new sustainable model of community development.

#### What now?

From Wednesday 28th November 2018 to Sunday 13th January 2019, we will be seeking formal feedback on the draft neighbourhood plan.

The draft Neighbourhood plan can be viewed online at:

<http://camleystreet.org.uk>



#### How can you give your feedback?

There will be a series of events at which you will have the opportunity to give your feedback and talk to members of the forum and planning team.

They will be held on:

**Wednesday 28th November 2018 16:00-19:00**  
**Monday 10th December 2018 17:00- 20:00**  
**Saturday 5th January 2019 11:00-14:00**

Your feedback is also welcome by telephone and email

#### Where:

The Library, Camden Council, 5 Pancras Square, Kings Cross, London N1C 4AG

The information will be displayed permanently between the consultation dates, from the 28th November in the library at 5 Pancras Square.

For further information and to give your feedback please contact:

Phone: 020 7255 9976  
 Or  
 Email: [secretary@camleystreet.org.uk](mailto:secretary@camleystreet.org.uk)

**For more information please visit <http://camleystreet.org.uk>**

## Camley Street Draft Neighbourhood Development Plan Consultation - Winter 2018/19

# Key Feedback

In 2015 residents and local businesses were surveyed to gain their feedback on the Plan Area.

The key feedback was as follows:

#### Positive Features Include:

- People particularly value the area's central location
- People also liked the area's sense of calmness, away from the busier town centres at King's Cross and Camden Town
- The sense of community is valued
- Over half of respondents were happy with the physical appearance of the area
- As the only local supermarket, the Co-op is heavily used. Any additional housing developments in the area should have further shops, social infrastructure (i.e. health provision, education, community play, youth, recreation, sports, faith, and emergency facilities) and services to serve the needs of existing and new populations
- 50% of residents surveyed agreed that they have good access to green space
- 18.7% of the working population in the area work within 2km of their home
- 70% of those surveyed agreed that the area's role as an important employment hub is valuable and should be protected



#### Main Concerns and Issues Raised Include:

- A small number of respondents (8%) perceived general levels of connections are poor to other areas
- There were a number of concerns raised surrounding criminal and anti-social behaviour (ASB)
- Strong concerns were raised about environmental quality. People wanted better waste services. Key areas of concern included: under the Camley Railway Bridge and at the junction of Camley Street and Barker Drive and Crofters Way.
- 29% of respondents felt there was not enough street lighting around Elm Village Open Space and under the bridge by the garages, which leads to concerns about safety and security.
- Current imbalance of locations of open spaces. Residents at Barker Drive are well served, but those at Weavers Way flats are not
- Respondents wanted a bus service along St Pancras Way and improved cycle infrastructure – over half of respondents (51%) wanted improved bus services/bus stops
- Whilst there is a strong sense of community, there is a lack of places to socialise

#### Views on Planning for the Future of the Area Include:

- People wanted the area to remain with mixed uses – 17% of respondents expressed a wish to retain employment uses and 17% of respondents expressed a wish to retain housing as the predominant use in the area
- 22% of respondents wanted better community facilities and places to socialise
- 15% of respondents wanted better access to green spaces
- Future employment uses should include light industrial workspace (37.6%), shops (34.7%) and other office uses (23.5%)
- Housing was viewed as the greatest priority for the area: 32% of those surveyed, with employment uses second, 25.9% and shops and leisure 20.5% and 20.1% respectively

#### Camley Street Harvest Party Feedback:

At the Camley Street Harvest Festival the feedback received in 2015 was supported and expanded upon.

Most people seemed to like living there, and the proximity to the regenerated King's Cross was a major bonus. People talked of a good community; there were a lot of young people and some had children.

People did talk about some of the problems that affect the area. This mainly revolved around the exits and entrances to the area, both under the rail bridge at the south end (much improved now it's better lit) and the railway bridge at the northern end out towards Agar Grove. This railway bridge remains an issue, with abandoned cars and anti social behaviour.



Illustration: © Konradsevic Conson Architects

For more information please visit <http://camleystreet.org.uk>

## Core Objectives

### Core Objective 1: Employment

Development will ensure the neighbourhood's continued function as a place of employment led by light industrial functions.

#### Sub-Objectives

1. The Cedar Way Industrial Estate currently provides space for food production and storage, serving the needs of the restaurant and hospitality industries across London. This specialism performs a function of strategic importance at the regional scale and should be safeguarded.
2. London is witnessing a shift from traditional office accommodation to more informal workspaces, offering greater flexibility and opportunities for collaboration with other organisations; this culture is compatible with the vision for the NP Area, and such spaces will be included in any redevelopment proposals.
3. Working from home is compatible with sustainable development on account of reducing the demands on transport infrastructure at busy times and providing a human presence in the community during the day. Residential units should be designed in such a way that working from home is a realistic choice.

### Core Objective 2: Local Community and Social Needs

Development will encourage the strong community spirit that currently exists through the provision of improved social infrastructure.

#### Sub-Objective

1. To provide a 'community hub' including community spaces, convenience retailing and 'key services' to encourage a cohesive community.

### Core Objective 3: Housing

Development will support the growth of a truly mixed community through the provision of housing of different types.

#### Sub-Objectives

1. To deliver the maximum viable number of dwellings for rent at affordable levels
2. Housing suitable for families will be prioritised
3. Seeking to limit the amount of additional purpose-built student blocks in the area.

### Core Objective 4: Sustainable Transport

Development will facilitate improvements to the public realm making walking and cycling easier and providing easier access to local centres, given the long distances from some parts of the neighbourhood.

#### Sub-Objectives

1. New development should promote cycling by providing cycle storage/parking in line with Local Plan requirements
2. To facilitate public transport
3. To promote walking by reinforcing desire-lines through traffic-calming measures, improving road signs, making routes safer by encouraging street activity including: active ground-floor frontages, street lighting and other public realm improvements.
4. New residential developments should be car-free in line with Local and London Plan Policies.
5. Non-residential proposals should utilise sustainable modes of transport as far as possible and demonstrate how this has been achieved.

### Core Objective 5: Green Infrastructure

Development will increase the range and quality of and accessibility to green spaces in the neighbourhood.

#### Sub-Objectives

1. To protect and improve existing green spaces at Camley Street Nature Park and Elm Village.
2. To provide more greening in the area such as green verges, trees and small pocket and linear parks.
3. To provide/improve connections to existing green spaces outside of the Neighbourhood Plan Area boundary.
4. To promote biodiversity.

### Core objective 6: Design Quality

Development will preserve and enhance existing positive features in the local area including designated and locally designated heritage assets and views and should maximise opportunities to enhance accessibility and legibility throughout the Plan area, in particular improving the experience for pedestrians and cyclists with regards to safety and comfort.

#### Sub-objectives

1. New development should preserve and enhance existing heritage assets and key views within the area such as Primrose Hill
2. Redevelopment proposals for the area should look to improve connectivity through the area, in particular creating new accessible links to the Canal via east/west routes.
3. The current green infrastructure network should be enhanced through informal planting opportunities and wayfinding improved through design measures such as well designed signage, street furniture and lighting.
4. Any new residential development proposals should be of the highest quality and be accessible to all.
5. To promote sustainable design standards throughout the area including climate change mitigation.

Do you agree with the Core Objectives?  
Is there anything we have missed?



For more information please visit <http://camleystreet.org.uk>

# Appendix 10: Winter 2018/19 Consultation Feedback form Regulation 14 consultation

## Feedback: Camley Street Neighbourhood Development Plan 2018/19

1. Name: \_\_\_\_\_

2. Postcode: \_\_\_\_\_

**Your details will not be stored but will help us identify where people come from.**

3. Are you... (Please tick)

- A Camley street resident
- A Camden resident
- A business operating in Camley Street
- A charity or community group

Other please specify \_\_\_\_\_

4. Do you agree with Core Objective 1: Employment (EM Policies)

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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5. Do you agree with Core Objective 2: Local Community and Social Needs (CSN policies)

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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6. Do you agree with Core Objective 3: Housing (HO Policies)

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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**7. Do you agree with Core Objective 4: Sustainable Transport (TR Policies)**

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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**8. Do you agree with Core Objective 5: Green Infrastructure (GI Policies)**

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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**9. Do you agree with Core Objective 6: Design Quality (DQ Policies)**

- |   |   |
|---|---|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Strongly Disagree      |
| <input type="checkbox"/> Agree          | <input type="checkbox"/> Neither agree/disagree |
| <input type="checkbox"/> Disagree       |   |

Any other comments?

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**10. Is there anything we have missed which will help to improve the Camley Street area?**

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**11. Do you have any other comments you wish to share?**

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Please return your form to: [secretary@camleystreet.org.uk](mailto:secretary@camleystreet.org.uk) by the 13th January 2019 or leave in the folder provided.

## Appendix 11: Issues raised and considered: Residents

Comment	Response	Change
<b>Core Objective 1 - Employment Policies (CS EM1 &amp; CS EM2)</b>		
Relocating the businesses will increase the travel miles on goods. There is no reason why light industrial businesses cannot co-exist happily alongside residential units.	Agreed. The Forum and the CSNDP support the co-location of uses.	No change necessary.
Support retaining the businesses in their current location. Could the 'working from home' aspect be enhanced with provision of childcare, hot desking, shared workspace, to increase flexibility.	Exact provision will be determined at planning application stage. The Plan provides overarching aims for the Neighbourhood Area.	No change necessary.
Increase variety of businesses e.g. office space.	The key objective of the CSNDP is to retain the existing businesses within the Neighbourhood Area. However, the Forum are also supportive of encouraging other employment uses that are compatible with the light industrial functions.	No change necessary.
Important to retain businesses and local jobs, to prevent area becoming 'dormant'.	The key objective of the CSNDP is to retain the existing businesses.	No change necessary.
Cedar Way Industrial Estate is an important local food hub, it is essential that this is retained to keep travel distances at a minimum, ensure the viability of an electric delivery fleet and thereby reducing environmental impact.	The TR policies promote sustainable transport, in particular mitigating and managing any increase in industrial traffic as a result of re-development.	No change necessary.
Noise from early deliveries, and smell from 'nuisance' businesses disturb nearby residents, and therefore these businesses need to move elsewhere.	The TR policies seek to mitigate any conflicts between residential and employment uses. The CSNDP has also adopted the agent of change principle to manage noise impacts of intensified light industrial uses.	No change necessary.
Strike a balance between residential and business uses.	The CSNDP seeks to promote mixed use development throughout the Neighbourhood Area in order to secure sustainable communities.	No change necessary.
Strongly object to removing the businesses.	Noted. A key objective of the CSNDP is to retain the existing businesses.	No change necessary.
<b>Core Objective 2 - Community and Social Infrastructure Needs Policy (CS CSN1)</b>		
Social and cultural benefits associated with the change would be welcomed.	Policy CSN1 seeks to encourage opportunities for social interaction and activity.	No change necessary.
The type of community facilities suggested in 6.94 need to be carefully thought through - facilities for young people, and education facilities would be particularly welcome.	Noted. In the longer term the Forum will collate a CIL funding wishlist with the support of the community which will identify infrastructure needs.	No change necessary.
Include a flexible events area, as well as more restaurants and cafés.	The Plan sets out an overarching vision for the Neighbourhood Area. Exact uses will be determined through a planning application.	No change necessary.
Sense of community should be preserved.	Policy CSN1 seeks to encourage opportunities for social interaction.	No change necessary.
The mixed use identity and character of the area needs to be retained.	The plan seeks to preserve and enhance this.	No change necessary.
Support for the plan - retaining community and jobs.	Noted.	No change necessary.
Retain the mixture of jobs, and provide essential services for families to move in	The plan seeks to retain existing employment opportunities and create opportunities for new businesses.	No change necessary.
Support retention of food production businesses.	The plan seeks to retain existing business and recognises the strategic function the food production industry makes not only to the local area, but also to Central and Greater London.	No change necessary.

Comment	Response	Change
There is a need for local transport.	Noted. The TR policies expect new development to integrate more widely within the local transport network and promote opportunities for new connections.	No change necessary.
A new community hall for all ages, and new sports facilities such as a gym would be welcome.	Policy CSN1 promotes opportunities for social activity and interaction. The Plan does not specify exact uses or facilities, but the Forum are committed to working with the Council on a CIL funding wishlist for identified community facilities.	No change necessary.
Restaurants and new fast food shops.	Mixed use development is supported within the CSNDP including retail and other employment uses. Food production is a key component of the Neighbourhood Area and the CSNDP seeks to continue to promote sustainable food production.	No change necessary.
<b>Core Objective 3 - Housing Policies (CS HO1, CS HO2 &amp; CS HO3)</b>		
Absolutely no requirement for further luxury housing. Local people on average wages cannot rent, let alone buy property in the area, and these people are often doing essential work in the area e.g. teachers, nurses. The plan to deliver genuinely affordable housing is strongly supported, and must take priority.	The CSNDP has an aspiration for 100% provision of affordable housing within all new residential development, with a minimum requirement for 50% provision on publicly owned land and 35% for all other land.	No change necessary.
Particular need for housing with 3+ bedrooms, as well as wheelchair accessible housing, and affordable student housing.	Policy CSHO1 requires affordable family housing and places an emphasis on providing housing types to meet a number of different needs.	No change necessary.
Encourage design flair that enhances the area - the mix of designs in the Kings Cross development is an excellent example. Not more tasteless brick buildings already seen on Camley Street.	The DQ policies seek to secure high quality, sustainable designs within the Neighbourhood Area that reference the local and wider context (including Kings Cross).	No change necessary.
Do not support the inclusion of student housing, as this will contribute to the feeling of 'ghost towns' when students leave for long periods over summer months, and they have no attachment, nor do they contribute to the area.	Policy HO3 seeks to limit the amount of mono-use student blocks that do not contribute to the local community.	No change necessary.
Provision of new housing is strongly supported.	Noted.	No change necessary.
Would agree if it were controlled and run by 'the trust'.	The Plan does not specify a development or management model.	No change necessary.
Why not lease all units back to the council so the development will pay for itself?	The Plan does not specify a development or management model.	No change necessary.
There is already enough new residential dwellings in the area, instead focus on improvements to the industrial area.	Promoting mixed use, employment led, sustainable development within the Neighbourhood Area is a key objective within the CSNDP. However, there is a demonstrable need for affordable housing within the Neighbourhood Area and the Plan looks to secure this.	No change necessary.
<b>Core Objective 4 - Sustainable Transportation Policies (CS TR1 &amp; CS TR2)</b>		
Support the development of electric vehicles and enhancement of green space.	Noted.	No change necessary.
Encouraging walking and cycling is supported. Elm village is a good example of how vehicle use can be accommodated into a residential setting, and can this be transferred to the business developments.	All new development within the Neighbourhood Area will be car free as per the Local Plan standards. Cycle parking provision however, will be secured as part of all new developments, including residential.	No change necessary.

Comment	Response	Change
If private parking is going to be discouraged, it would be good to have a bus service that connects to Kings Cross/ St Pancras, as well as bike storage and electric car club spaces/ charging points. Another recommended bus route along St Pancras Way around Camden Garden Centre, as well as bus stop around Goods Street and Camley Street.	Core Objective 4 supports a modal shift towards sustainable transportation including public transport. The Plan cannot designate new bus stops/routes, however, TR2 encourages the use of public transport routes and expects new development to integrate within the wider public transport network. Major re-development proposals will also need to liaise with TfL regarding access and may provide new public transport improvements as part of developer contributions. TR2 also expects all new development to encourage cycling through the provision of parking facilities and improving the existing network.	No change necessary.
Removal of the cycle lane on St Pancras Way could allow for a bus route. Better lighting on the canal towpath would improve safety. Improved street cleaning. There is a drug issue in the area which should also be addressed.	Policy CS TR2 encourages walking and cycling throughout the Neighbourhood Area. However, the Forum is also aware that the Area currently lacks public transport accessibility, despite its central location. The DQ policies promote improved accessibility, particularly east-west, which should improve access to public transport. Major re-development proposals will also need to liaise with TfL regarding access and may provide new public transport improvements as part of developer contributions. TR2 also seeks to improve and upgrade the existing pedestrian and cycling network, which will include safety measures such as; street lighting and improved signage.	No change necessary.
Support for cycle infrastructure, but would be useful to discourage cycling on pavement.	Policy TR2 encourages walking and cycling throughout the Neighbourhood Area. Camden Highways team will be able to comment on any subsequent planning application within the Neighbourhood Area in order to secure pedestrian safety.	No change necessary.
Ensure that walking and cycling at night is made to feel safe. Improve accessibility to the area, and offer segregated cycle lanes.	A key aim of the TR and DQ policies is to improve accessibility and legibility throughout, into and out of the Neighbourhood Area, which will improve pedestrian and cyclist safety and convenience.	No change necessary.
With the introduction of PCN's, parking is now extremely difficult.	All new development within the Neighbourhood Area will be car free as per Local Plan standards.	No change necessary.
Current delivery drivers are aggressive and often speed. Delivery vehicles should have back road access to loading docks, not from the main street.	Policy TR1 seeks to mitigate and manage conflicts between industrial traffic and residential uses and pedestrians. Proposals for employment/light industrial uses will have to demonstrate that there will not be an adverse impact on the local area in terms of traffic.	No change necessary.
Lower food miles means less congestion, and less pollution.	Agreed. This is why the CSNDP's key aim is to retain the existing businesses in order to maintain short delivery times and promote sustainable development.	No change necessary.
Size of scheme may worsen traffic.	All new development will be car free as per Local Plan standards. Policy TR1 seeks to manage and mitigate adverse impacts relating to industrial traffic in the event of re-development.	No change necessary.

Comment	Response	Change
Try to prevent an increase in traffic.	All new development will be car free as per Local Plan standards. Policy TR1 seeks to manage and mitigate adverse impacts relating to industrial traffic in the event of re-development.	No change necessary.
Car parking provision should be allocated, as cars are currently using Elm Village parking illegally.	All new development will be car free as per Local Plan standards. The CSNDP has no control over existing CPZ's or car parking areas.	No change necessary.
Improve public transport connecting Agar Grove, Baker Drive and Midland Road.	Core Objective 4 and the associated sub-objectives seeks to promote sustainable transport throughout, into and out of the Neighbourhood Area, including integrating new development within the wider transport network and also encouraging the use of public transport where possible. Developer contributions may be sought in relation to public transport improvements where appropriate. This will be secured at planning application stage.	No change necessary.
<b>Core Objective 5 - Green Infrastructure Policies (CS GI1, CS GI2 &amp; CS GI3)</b>		
Enhancements to green space and infrastructure strongly supported.	Noted.	No change necessary.
Trees should be better provided and cared for.	The Green Infrastructure policies promote urban greening throughout the Neighbourhood Area including new tree planting. Policy GI1 resist the loss of good quality trees and expects replacement where loss is unavoidable.	No change necessary.
Encourage the protection and enhancement of green space for mental health benefits and wildlife benefits.	Policy GI1 protects all existing green spaces of value. Policy GI2 expects new development to create new, accessible green spaces that will provide green links throughout the Neighbourhood Area.	No change necessary.
Green infrastructure should be even higher up the agenda - this is an opportunity to take a lead on sustainable development.	The order of the policies and objectives is not hierarchical - they all have equal weight.	No change necessary.
Improve the safety of Regents Canal Towpath as it is currently unsafe for children.	Policy CS GI2 requires developments to contribute towards improving the Canal towpath including urban greening and accessibility, which will improve pedestrian safety.	No change necessary.
Ensure green spaces are kept clean and dog owners clean up after their dogs.	This is not something the Plan can secure, however, all applications providing green space will need to provide detail on how the spaces will be managed.	No change necessary.
<b>Core Objective 6 - Design Quality Policies (CS DQ1, CSDQ2 &amp; CSDQ3)</b>		
The architectural design of the Camley Street plan really stands out, and honours the historical and architectural heritage of the area.	CS DQ1 expects new development to respond positively to the local context, including designated and non-designated heritage assets and views.	No change necessary.
Architectural design needs to be future proof, and a real asset to the area. New designs need to set themselves apart from recent styles and materials used on Camley Street, and champion sustainable eco design.	Promoting sustainable development underpins every policy within the CSNDP. Both policies CS DQ1 and CS DQ2 provide specific guidance on how new development should promote sustainable design.	No change necessary.
Could re-designate the area to be part of Kings Cross Ward. Like the area to be NIC.	The Forum is aware of the potential shift in ward boundaries, however, this is not a relevant consideration in the Neighbourhood Planning process.	No change necessary.

Comment	Response	Change
The height of new development is too high.	Policy CS DQ3 provides specific guidance on the design of tall buildings and figure 45 identifies areas where they may be appropriate. The Forum recognise that well designed tall buildings can contribute positively to an area and expect taller buildings to come forward within the Plan period. Specific heights will be determined at planning application stage.	No change necessary.
Frontages stepped back from the road are excellent.	Noted.	No change necessary.
<b>Additional Comments</b>		
Opening up Camley Street with Agar Grove could allow for services to access the area, and also remove the cul-de-sac which encourages anti-social and illegal behaviour.	The opening up of this area would require consultation with the council and landowners and is not specifically something that the Plan can secure.	No change necessary.
Encourage links to the new Camden High Line, which will bring more visitors into the area.	Policy CS GI2 expects new development to provide links to key green routes within, into and out of the Neighbourhood Area including the proposed Camden High Line.	The links to the high line have been included into the NP.
No more luxury flats and associated gentrification.	The provision of affordable housing within the Neighbourhood Area is a core objective of the CSNDP and policy CS HO1 expects all new residential proposals to contribute towards the affordable housing need, including family housing.	No change necessary.
Clean up the waste under the railway bridge next to the garage. Increase police patrols.	Policing is not a consideration that the CSNDP is able to address, however, the TR, GI and DQ policies promote accessibility and legibility throughout the Neighbourhood Area, which will improve pedestrian safety.	No change necessary.
Need for a pharmacy in the area.	Mixed use development is supported within the CSNDP including retail and other employment uses. Exact uses will be specified within a Planning Application.	No change necessary.
Need a Santander cycle hire station.	Noted. The Forum are keen to promote cycling throughout the Neighbourhood Area.	Paragraph 6.19.2 wording amended to include reference to cycle stations. Figure 33 show the location neighbouring hire stations.
No 'right to buy' in the new scheme.	The CSNDP cannot restrict right to buy, as this is a National policy. However, policy CS HO1 strongly supports the provision of social rented housing in order to meet a locally assessed need.	No change necessary.
More street lighting, more pedestrian crossings, more colour.	Policy CS TR2 expects new development to contribute to improving and enhancing the existing pedestrian and cycle network through measure such as, better street lighting, signage, urban greening etc. Developer contributions will also be secured which will can be used towards public realm improvements.	No change necessary

## Appendix 12: Issues raised and considered: Statutory Consultees

Consultee	Comment	Response	Change
<b>Policy CSEM1 – Employment Floorspace Provision</b>			
HS1	“Innovative building solutions will be required to accommodate the diverse range of uses in the locality with potentially double faced buildings (one side serving residents and another side serving businesses, this could be accommodated with a commercial access spine along the railway interface or via an undercroft. In the event that the businesses are served by a basement/podium structure we would be interested in working with you to better understand how the design might interact with the existing ramp providing access to the railway. Access to the ramp must be maintain at all times.”	Phasing to be discussed at a later date.	No change necessary.
SHAW	“We disagree with the specific requirement that development must ensure that the amount of existing B1(C) floorspace and B8 storage space present on a site is, as a minimum, maintained and preferably increased. The Cedar Way Estate is not a SIL. Although (local plan) policy E2 states that LBC will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided the level of employment floorspace is increased or at least maintained, this is not specifically restricted to B1C and/or B8 as proposed by draft Policy CS EM1.”	The Plan policies have been drafted in line with the LBC Local Plan and London Plan (adopted and emerging). Greater emphasis has been applied to emerging London Plan policy in support of the retention of existing light industrial and warehouse uses within Central London where they perform a strategic function. LBC is also categorised as a ‘retain capacity’ Borough within draft New London Plan Policy E4, Table 6.2. Therefore, there is already a presumption in favour of retention for these uses.	No change necessary.
SHAW	“We disagree with the statement that development must ensure that any new B1(C) floorspace provided is charged at average Greater London rental rates.... The requirement... is not provided for by the adopted Local Plan and is overly market restrictive and does not reflect the flexibility offered by paragraph 5.44 of the Local Plan.”	As per NPPF and PPG guidance, a Neighbourhood Development Plan is meant to be more detailed than higher level policy. Therefore, the CSNDP policies offer less flexibility than the Local Plan. As stated above, the existing B1C uses perform a strategic function within the Neighbourhood Area, hence the rental protection afforded to the businesses within the Policy.	No change necessary.
Savills	“We do not think that the policy is realistic or justifiable and therefore is not deliverable. In order to make the most efficient use of the site, the existing buildings would need to be demolished. It is our view that only residential values would unlock this. Maintaining the industrial floorspace as a minimum is not achievable. There may be potential to incorporate some small scale employment floorspace in the form of office or hotel which would be more compatible with the character of the surrounding area.”	The Forum recognises the need for regeneration and strongly believes that the NP area requires the ‘right development’ that will benefit the existing local community. Therefore, provisions are made within the Plan to secure said development. Viability work has been undertaken which shows that the policies will not prevent development. Loss of industrial floorspace is contrary to both Local Plan and London Plan (current and new) policy. Further, Camden is designated within the ‘retain category’ within the Draft New London Plan (Policy E4, Table 6.2). Borough’s within the ‘retain category’ should seek to intensify industrial floorspace, following the general principle of no net loss.	No change necessary.

Consultee	Comment	Response	Change
<b>Policy CSEM2 – Retention of Existing Businesses</b>			
Camden DMC	“The retention of local jobs and workspace in a truly mixed development is another excellent inclusion.”	The Forum welcome the support from Camden DMC.	No Change necessary.
GLA – Local Plans Team	“...Industrial areas like Cedar Way/Camley Street provide an important opportunity to provide industrial capacity to service to the Central Activities Zone (CAZ). The priority should be for replacement/ additional industrial capacity that meets and identified need – such as industrial businesses, including logistics that service the CAZ. Draft London Plan policy E4 sets out appropriate industrial uses... Given the amount of industrial floorspace and the nature of the existing sites/buildings uses i.e. large warehouses, an area wide approach is needed to enable the intensification of the industrial capacity and to retain the existing occupiers where required. It would be helpful for the Neighbourhood Plan to provide some indication of the opportunities to redevelop and intensify the industrial area and how this will be delivered.”	The Forum welcome the GLA's support for the retention of existing uses/ businesses. The Forum encourage the intensification of existing uses through policy CS EM1.  The Neighbourhood Plan is envisaged to be used as a tool to inform and encourage development within the Neighbourhood Area. It is not a site allocation and therefore does not state how development will be delivered.	Further information provided in relation to the strategic role the existing businesses play and the links they have to the CAZ within the supporting text, paragraphs 6.74 and 6.77.
HS1	“The Plan should clearly identify the criteria that will lead to businesses being added to the list... It is not currently clear what rationale has been used to select these businesses. HS1's forward maintenance facility needs to be located in close proximity to the railway.. Therefore why is its presence not protected in the plan?”	The table includes businesses within a specific use class that are at risk of relocation in the event of re-development. Given that the facility must be located next to the train tracks, there is an expectation that it would be retained and is therefore not at risk of being relocated (likely secured by a condition).	No change necessary.
SHAW	“The draft Neighbourhood Development Plan should mirror the Local Plan by acknowledging that the existing business premises may be redeveloped for non-business use where the site or building is no longer suitable for its existing business use... policy should also acknowledge that there may be circumstances where continued industrial use may not be compatible with other planned uses and aspirations for the regeneration of the area.”	Where it can be demonstrated that the existing businesses no longer wish to operate at the site, the expectation is that a similar operator will occupy that space. There is sufficient evidence across London that the type of land available at Camley Street is in short supply and high demand. The emerging London Plan includes the Agent of Change Principle (within paragraph 6.13.3), which the Draft NDP has also adopted to minimise conflict with residential development.	No change necessary.
Savills	“Planning policies cannot control market demands and should not become involved with private business negotiations.”	It has long been accepted that planning policy can require a proportion of new housing to be a certain tenure (e.g.; attempting to control market demand). It has been demonstrated that the businesses at Camley Street are critical for the functioning of Camden and the CAZ and should therefore be protected.	No Change Necessary.

Consultee	Comment	Response	Change
<b>Policy CS CSN1 – Social Infrastructure Provision</b>			
Camden Garden Centre	“...Camden garden centre needs to be retained and protected within the neighbourhood. In addition the Victorian Building is locally listed.”	The garden centre has been noted as a vital local asset and also included within the design policies.	Inclusion of the garden centre within supporting text paragraph 6.9.2.
Canal and River Trust	“The trust considers that access to high quality waterway (waterside spaces) can have important health and well-being benefits... we suggest that this link could be strengthened in this policy and/or across the plan generally.”	Noted.	The importance of the Regents Canal as a social resource as well as pedestrian and cycle route has been emphasised more clearly within supporting text, paragraph 6.9.6.
London Wildlife Trust	The new CSNP Visitor Centre should help to compensate the lack of community venues within the area.	Noted.	Reference to the new visitor centre has been included within the supporting text, paragraph 6.9.2.
Somers Town Neighbourhood Forum	“We are aware that residents’ schools, GP surgeries, cultural and faith-based facilities are located in bordering areas and would urge you to work closely with those areas when planning for growth.”	Noted and the following wording proposed “The Forum recognise that health and education facilities serving the Neighbourhood Area’s population lie outside the area boundary. However, they are fully committed to working alongside other Neighbourhood Forum’s to secure S016 and CIL funding for these facilities as well as other community and social facilities within the area’s boundary.”	Proposed wording included within the supporting text, paragraph 6.9.8.
<b>Policy CS HO1 – Affordable Housing Provision</b>			
Camden DMC	“I can do no better than to endorse everything... in particular, the prospect of a significant number of genuine not for profit housing units fulfilling a vital social need locally.”	The Forum welcome the support from Camden DMC.	No change necessary.
GLA – Local Plans Team	“The Neighbourhood Plan should reflect the Mayor’s threshold approach in line with his Affordable Housing and Viability SPG and draft London Plan policy H6... lack of reference to the threshold approach is likely to be a point of non-conformity... with regards to housing mix for the market housing element, the Neighbourhood Plan should ensure a flexible approach in line with draft London Plan H12.”	Reviewed and agreed with suggested changes.	Policy wording updated to state 50% on publicly owned land and 35% on all other land as a minimum.  Supporting text, paragraph 6.11.3 revised to include reference to Threshold Approach where industrial capacity is lost/on public sector land. Reference has also been made to market housing mix.

Consultee	Comment	Response	Change
HS1	“There would appear to be a tension between London Plan affordable housing policies of providing between 35-50% and the NP aspiration of between 50-100%... we believe that viability is unlikely to support such a high target.”	The GLA threshold approach expects a minimum of 50% affordable housing provision on publicly owned land. Therefore Camden owned parts of the Neighbourhood Area would need to provide a minimum of 50% affordable housing as per London Plan requirements. Other privately owned areas would need to meet the minimum threshold of 35%. However, where a proposal results in the loss of industrial floorspace there will be an expectation for 50% provision regardless of landownership.	Wording amended as above.
Montagu Evans	“We consider the target within emerging Policy CS HO1 to be particularly onerous and propose that 50% as a minimum is removed and replaced with 50% as a strategic target, ensuring consistency with the new London Plan. ... It is our view that the Neighbourhood plan should propose an affordable housing tenure mix which is consistent with the emerging London Plan.”	The majority of the NP Area is Camden owned, therefore the expectation is for 50% affordable housing provision on publicly owned land as per Draft New London Plan Policy H6 (Threshold approach to applications). There is also an expectation within policy H6 that Non-designated Industrial Sites should provide a minimum of 50% where the scheme would result in a net loss of industrial capacity.	No change necessary
SHAW	HO1 “is contrary to the adopted Local Plan and should be amended... We do not consider that the NDP can impose a ‘minimum’ affordable housing level of 50% where its application is inconsistent with the Local Plan.”	Please refer to above.	No change necessary.
Savills	“The policy should place greater emphasis on the role that viability assessments can have in determining the appropriate level of affordable housing. There should be explicit reference to affordable housing being subject to viability assessments. As currently worded the policy conflicts with both the Local Plan and London Plan. The London Plan allows proposals to deliver 35% in certain circumstances.”	Reference has been made to viability within the policy wording and supporting text. Please refer to justification above.	No change necessary
<b>Policy CS HO2 – Residential Provision in Mixed-Use Development</b>			
GLA – Local Plans Team	“It would be helpful if the Neighbourhood Plan gave an indication of the number of homes likely to be delivered in the area. This should be done in conjunction with Camden Council... Consideration should also be given to the delivery of small housing developments in accordance with draft London Plan policy H2.”	The NP does not seek to allocate sites for development, and so has not explored numbers across the area. However, a feasibility study for the mixed-use area (identified in Figure 45) demonstrated that the area could support up to 600-800 homes. This has been used to justify the 90% cap within the student housing policy.	Supporting text to Policy H03 in para 6.15.7 amended to include reference to numbers.
HS1	“The close proximity of the railway to many of the potential development opportunities in this area lends itself to a development form of commercial/business uses on lower floors with residential accommodation above.”	Agreed.	No change necessary.

Consultee	Comment	Response	Change
SHAW	"We disagree that all proposals to redevelop single-use non-residential areas into mixed-use developments should provide at least 50% of all additional floorspace as self-contained housing. We also disagree that all proposals to redevelop commercial areas into mixed use development should provide 50% of all additional floorspace 1,000sqm or more as self-contained housing... As per the Local Plan, the supporting text should note that the Council will consider whether self-contained housing is required as part of a mix of uses taking into account the character of the development and site circumstances."	Reviewed supporting text, and agree that reference to Local Plan Policy H2 would be helpful. However, a key ambition of the CSNDP is to promote sustainable, mixed communities. As such, it is critical that a mix of uses is brought forward within the area including much needed affordable housing.	Supporting text to HO3, paragraphs 6.13.2 and 6.13.4 has been amended with reference to Local Plan Policy H2.
<b>Policy CS HO3 – Student Accommodation</b>			
GLA – Local Plans Team	"The best way to manage the mix of residential types could be through allocating the most appropriate residential uses on particular sites, for example student housing."	The Plan does not allocate specific sites as the Forum do not want to constrain any future development proposals.	No change necessary.
SHAW	"We disagree with the restrictions at a-d of Policy HO3 and do not consider that the approach is consistent with the Council's policies... there is an opportunity for Camley Street to provide links to the higher education institutes and for these establishments to form a positive part of the Neighbourhood Plan area. Greater emphasis should be placed in the Neighbourhood Development Plan on the opportunity to provide higher educational and university facilities at Camley Street."	Parts A-D have been informed by the Camden Policy Team, Local Plan, adopted and draft London Plan and the Housing SPG. Part A has been informed by a comprehensive review of census data within the ward and the Borough. Parts C and D are now requested within higher policy and the Forum believe it is important to encourage mixed communities including within student accommodation, ensuring that it is affordable, safe and accessible to all, including students with mobility impairments.	No change necessary.
Savills	"Student housing provides a much needed form of accommodation and there is no justification for a cap. Student housing has proved a viable and popular use in the surrounding area, including the Kings Cross Growth Area, and it would therefore tie in with the character of the area."	LSOA and ward level data demonstrate that there is an over-provision of student housing within the NP Area. The type that has historically been provided does not meet any identified local need as it is very expensive and does not fit in with local character.	No change necessary.
<b>Policy CS TR1 – Managing Industrial Traffic</b>			
Canal and Rivers Trust	"Policy CS TR1 could recognise the potential opportunities to use the Regents Canal for the movement of freight, particularly that related to demolition and construction."	Noted. Reviewed and amended. Policy TR1 amended to include opportunities to utilise the Canal for the movement of freight.	Reference to the Canal has been included within supporting text to TR1, paragraph 6.17.3.
HS1	"The segregation of industrial traffic and public realm will be critical in terms of creating a pleasant environment... accommodation of the delivery bays and industrial traffic within a basement/podium would be one way of achieving this."	Noted. The Forum does not wish to prescribe exact building typologies, however, TR1 seeks to mitigate and manage the impact of increase light industrial traffic through the segregation of residential and industrial uses.	No change necessary.

Consultee	Comment	Response	Change
TfL	"We support segregating freight traffic from pedestrians, cyclists and general traffic. However, ways of reducing freight movements overall, such as trip consolidation, should also perhaps be encouraged and included in policy CS TR1."	Agree.	Supporting text to TR1 amended to include reference to TfL guidance within paragraph 6.17.2.
<b>Policy CS TR2 – Encouraging Walking and Cycling</b>			
Canal and Rivers Trust	"We support the principle of new developments connecting to the Regents Canal Towpath.... However, we would suggest that the policy should also recognise that new developments provide opportunities to enhance the canal corridor and to mitigate the impacts of additional users. We welcome the aim of creating a more legible cycle network in the area and we would be happy to work with the Forum and others to help deliver this."	Noted, reviewed and amended.	Policy TR2 amended to "opportunities to enhance the Regents Canal corridor should be explored"
HS1	"The plan should set out in plan form existing transport routes and connections and aspirational routes and connections in an aim to improve connectivity from the area."	Agree that a map would be helpful.	Figure 33 is provided showing existing transport access into, out of and through the NP Area.
TfL	"Figure 28 features a way-finding signage that is different to Legible London. We request that the Neighbourhood Plan specifies Legible London will be the official wayfinding system throughout the area... TR2 should be supported by a detailed map which should include all the key travel routes in the area, to help people recognise appropriate locations for Legible London signs and other walking and cycling improvements."	Agree that a map would be helpful.	Figure 33 is provided showing existing transport access into, out of and through the NP Area.
<b>Policy CS G11 – Protection and Enhancement of Existing Open Spaces</b>			
Camden DMC	"The protection and enhancement of your orchards and green space is also extremely welcome..."	The Forum welcome the support of Camden DMC.	No change necessary.
HS1	"The plan should acknowledge the green space on Camley Street owned by HS1, this is adjacent to the railway close to the Coroner's court. This space provides an important green link and could potentially be improved if funding from contributions can be identified."	Agree that plan should acknowledge ownership.	Added to Fig 40 (now 45)
London Wildlife Trust	"The open space aspect of the Regent's Canal should also be explicitly referenced in clause E... the Regents Canal is a designated green chain and corridor, so should be included within the supporting text." Reference TPO's within the Natural Park.	The TPO's within the GSNP are protected by the overarching Local Nature Reserve designation, so do not require additional mention.	The Regents Canal is protected within G11, Clause F. Supporting text, paragraph 6.21.9 now expands on this and makes reference to the Canal as a designated Green Chain and site of Metropolitan Importance.

Consultee	Comment	Response	Change
<b>Policy CS GI2 – New Open Space Provision</b>			
Canal and Rivers Trust	“we have no objection to the support for this in principle, but would want to discuss the details of this further.”	The Forum welcome the support for Policy CS GI2 and are willing to engage with the Trust to promote the ‘greening’ of the Canal Towpath.	No change necessary.
HS1	“We do not agree with the extent of amenity space shown in the plan around units 1 and 2 Cedar Way, which shows a wedge of amenity space between the unit and the railway which in reality/does not exist. In addition the tree lined nature of Camley Street does not come through on the plan.”	Noted.	Amended Figure 34 (now figure 40) to reflect comments.
<b>Policy CS GI3 – Promoting Biodiversity</b>			
Canal and Rivers Trust	“We would be happy to discuss with the Forum what canal volunteering and/or local adoption opportunities might exist in the area.”	The Forum is happy to work with the Trust to explore and promote volunteering opportunities.	No change necessary.
GLA – Local Plans Team	“The draft new London Plan seeks a net gain in biodiversity and include a policy on urban greening.”	Noted.	Policy wording amended to state “...secure biodiversity net gain as a key objective...”
London Wildlife Trust	“Wonder whether that was an opportunity to make explicit reference to seeking to secure biodiversity net gain for all developments in line with the recently closed DEFRA consultation and as implied with the emerging New London Plan?”	Noted.	Policy wording amended as above.
<b>Policy CS DQ1 – Responding to Places</b>			
Canal and Rivers Trust	“The plan should seek to prevent impacts of development, such as overshadowing, adversely affecting the enjoyment of visitors and residents using the area’s public spaces such as the Regent’s Canal.”	The plan seeks to enhance the quality of existing open spaces, which includes the Regents Canal towpath.	No change necessary.
HS1	“Should the strategic views be added?”	Agreed that the CSNDP should illustrate the LVMF viewing corridors in respect of the Neighbourhood Area.	A map (figure 47) has been added to the NP.
TfL	“Request removal of the last sentence of the existing industrial mix objective in DQ1 and would suggest changing the second sentence to: given this objective, consideration will need to be given to new innovative building typologies that can contribute towards delivering high quality mixed use developments.”	Noted.	Reviewed wording and amended as recommended.
<b>Policy CS DQ2 – Connectivity, Accessibility and Legibility</b>			
HS1	“The plan should show more aspiration for improved east/west connections and should show connections extending beyond the red line.”	Agreed.	Figure 40 (now figure 45) has been amended to show the connections to Maiden Lane and the new Somers Town bridge linking Kings Cross to Camley Street.

Consultee	Comment	Response	Change
<b>Policy CS DQ3 – Proposals for Tall Buildings</b>			
Montagu Evans	“Emerging policy CS DQ3 is relatively vague and does not indicate whether tall buildings would be appropriate outside this area (identified on figure 40)... it is assumed the site is an area suitable for tall buildings... we therefore propose figure 40 is amended to reflect 104 Camley Street as an area where taller buildings can be assessed subject to the criteria set out in emerging Policy CS DQ3.”	The tall building policy has been written in line with guidance provided by Camden Council. The Plan does not seek to allocate sites for development and therefore, does not specify heights.	No change necessary.
Savills	“We support the recognition that there is potential for tall buildings in the area identified in grey as mixed use redevelopment on figure 40.”	Noted.	No change necessary.
<b>General Comments (other)</b>			
Canal and Rivers Trust	“We’re not clear why the pedestrian and cycle link along the canal does not continue to Kings Cross and suggest this be amended.”	Agree.	Figure 40 amended
Canal and Rivers Trust	“We would encourage consultation with canal users in the area, including the St Pancras Cruising Club and boaters moored adjacent to the 101 Camley Street development.”	Noted.	No change necessary.
HS1	General comments regarding amends to Figure 1.	Agree with comments.	Amended figure 1 in line with comments.
HS1	Introduction – make reference to the current redevelopment works at CSNP and amend para 2.25 to Kings Cross/St Pancras.	Agree.	New section added on Camley Street Natural Park within the introduction (paragraph 2.26 & 2.27). Paragraph 2.41 amended to include St Pancras.
HS1	“Wonder whether there is a piece about implementation, phasing, relocation of businesses and programming that should be addressed in the NP.”	We don’t believe that phasing should be addressed within the Plan as this is an overarching policy document and not a site allocation/planning application.	No change necessary.
London Wildlife Trust	“Regents Canal is a Site of Metropolitan Importance for Nature Conservation... Camley Street Natural Park is a Site of Metropolitan Importance for Nature Conservation... Points on the area history and Natural Park’s history.”	Agree with suggested text change.	New section added on Camley Street Natural Park within the introduction (paragraph 2.26 & 2.27). Reference to CSNP’s designation within paragraph 2.13 and reference to Canal designation within paragraph 2.12.
London Wildlife Trust	“Under Camley Street Natural Park we’d like to clarify that the majority of the resources for the new visitor centre and landscaping have been secured from grants and sponsorship rather than the S016 contributions.”	Agree with suggested text change.	Glossary definition of CSNP amended as per recommendations. (Page 63)

Consultee	Comment	Response	Change
Natural England	"Natural England does not have any specific comments on this draft plan."	N/A	No change necessary.
SHAW	"The Local Plan vision for Camley Street does not state that new employment space need be 'led by light industrial functions'... there should be greater emphasis in Core Objective 1 and throughout the document on a range of employment including educational uses."	As demonstrated within the employment policies the B1C uses perform a strategic function with the Borough and Greater London and are therefore afforded protection within the CSNDP. The Forum are keen to encourage a wider mix of uses within the Neighbourhood Area that will complement and support the existing light industrial function.	No change necessary
SHAW	"We note that 101, 102, and 103 have not been accurately represented on Figure 1 because both 101 and 102 are shown as 'industrial use' when these sites contain a mix of employment and residential."	Agreed.	Map amended to reflect comments.
Savills	"The current use makes inefficient use of space."	The Forum and NP recognise a need for intensification and design interventions to make the area more sustainable, liable etc.. and have provided suggestions as to how this could work.  It could also be argued that it is not the uses that make inefficient use of space, but the physical units that the businesses occupy. The Plan supports high quality and innovatively designed redevelopment proposals that will re-provide employment floorspace and also make more efficient use of the land.	No change necessary.

# Appendix 13: Issues raised and considered: London Borough of Camden

**Camden Council Local Authority Comments Table**

LBC Comment	Response	Change
<b>General comments</b>		
“Where policies are intended to apply to a defined part of the plan area, they need to be labelled as such and the area to which they apply clearly identified in maps and diagrams.”	Agreed.	Reviewed and amended policy/ supporting text wording and maps as appropriate.
(Taken from NDP para 3.3) “Any developments advanced within the area will...” “This is followed by a long list of aspirations which not all developments will be able to achieve.”	Agreed. Need to make clear where aspirations are relevant.	Amended policy text to read “any developments advanced within the identified mixed use area...” and labelled maps accordingly.
“The preamble to CS HO1 refers specifically to Cedar Way Industrial Estate, but the policy relates to all developments.”	Noted. Need to be clearer about how the policy applies across the Neighbourhood Area.	Reviewed and amended wording of paragraph 6.10.1 to read “whilst Policy CS HO1 applies across the Neighbourhood Area, the Forum believes...”  Policy wording amended to read “where appropriate, developments proposing... (as defined by LBC Local Plan Policy H4).”
(The plan) “provides less flexibility than Camden Local plan Policy E2 (criterion d) that states the Council will consider higher intensity redevelopment of premises or sites suitable for continued business provided that “the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry and warehouse/logistic uses that support the functioning of the CAZ or the local economy.”	It is envisioned within the NPPF and PPG that Neighbourhood Development Plans should provide more detailed policies and less flexibility than Local Plan policies.  We have interpreted the phrase ‘as far as possible’ to mean retention of businesses in this scenario given the importance of the existing businesses to the local and wider economy and their strategic links to the CAZ.  It should be noted that in respect of policy EM2, the Council objects to, ‘they will be retained and integrated’, but this is not a phrase that appears in the plan. The correct wording is, ‘efforts should be made to retain and integrate’.	No Change Necessary.
“New development over the plan period will satisfy the needs of the current business occupiers.”	Agree.	Amended wording to read “New development over the plan period within the mixed use area identified will...”

LBC Comment	Response	Change
“Each proposal has to be assessed based on its individual merits and taking into account policies in the development as a whole. Including this text in the vision could create unrealistic expectations about what the plan is able to do.”	The vision should be aspirational.	No Change Necessary.
“The Neighbourhood Plan could also hinder the ability to temporarily re-provide particular uses in the area as part of a long-term phased development.”	Do not agree that the NP is likely to hinder temporary uses, where they are complementary to the employment function of the Neighbourhood Area.	No Change Necessary.
“Highly bespoke premises, designed around the needs of a specific occupier, could have greater in-built redundancy, limiting their ability to provide accommodation for other businesses overtime without expensive intervention, or even redevelopment.”	The policy expects the retention of B1C and B8 uses, even if the existing businesses choose to relocate. Therefore, the likelihood is that the fit out provided for the existing businesses will be suitable for comparable businesses within the same use class. Evidence gathered from the businesses also demonstrates that the existing premises are not bespoke and could cater for a number of different occupiers should the businesses re-locate.	No Change Necessary.
“Replacement jobs are the same jobs, which is not something planning has the power to control. It would be appropriate to refer to increasing numbers of jobs, but existing positions and roles are not a planning matter.”	Noted.	Amended to safeguard existing employment opportunities and create new ones.
“Security of tenure is not a planning matter and cannot be guaranteed through a neighbourhood plan policy.”	Agree.	Reference to security of tenure removed from supporting text to the Vision, paragraph 4.2.
<b>Core Objective 1: Employment</b>		
(Ensuring replacement and new floorspace meets the needs of existing businesses) “would restrict the range of employment uses that could potentially be accommodated in any replacement/new floorspace.”	The CSNDP looks to retain and enhance the predominant existing B1C and B8 use within the NP Area. A mix of employment space is required by policy EM1. None of this would need to be bespoke, as current occupiers have no bespoke requirements.	No Change Necessary.
“Some of the uses are likely to be so specialist that comparable provision will not be realistic, or there may be uncertainty that they will be needed over the long-term.”	Contradicts Camden’s position that the businesses could be relocated to another industrial site.  The businesses are not bespoke, therefore seeking the retention of the employment floorspace would not prejudice other comparable businesses who choose to locate within the Neighbourhood Area.	No Change Necessary.

LBC Comment	Response	Change
“Rents for all the new/replacement floorspace cannot be secured through the planning process. This would be an unreasonable extension of planning control...”	The principle of a fair rent for new employment market uses is a key issue for the NP, as is the provision of an element of affordable workspace for new employment uses. This has been strongly articulated and supported through the consultation process.	No change necessary.
(Must ensure that the amount of existing B1C light industrial ... is maintained and preferably increased.) “This is not consistent with Local Plan policy E2 Part c which talks about employment floorspace in general and not maintaining specific amounts of parts of the B use class.”	The CSNDP’s principle aim is to retain the existing B1C and B8 uses as they are vital to the strategic functioning of the local area, wider Borough and the CAZ. Neighbourhood plans are expected to provide detailed policies relevant to the Local context. As such, it is determined that the policy is worded with regard to the local context and in particular a desire within the local community to protect the specific uses listed. The Forum welcome the concept of mixed-use development as long as the stated uses are retained.	No Change Necessary.
Camden Local Plan refers to ‘as far as possible’. “The emphasis is on protecting businesses supporting the CAZ and local economy rather than specific businesses per se and envisages that in some situations relocation can be an acceptable option.”	The retention of the existing businesses and light industrial uses is the principle objective of the CNSDP. As demonstrated within the evidence base, the central location is vital for the businesses to function. As such, ‘as far as possible’ has been taken to mean retention within the Camley Street context.  NB: This point seems to contradict the point above (paragraph 15), which states that the businesses are so specialist that comparable provision would not be realistic!	No Change Necessary.
“Unclear why this is required in all cases and how this would work in circumstances where there is replacement of existing as in part b) of EM1.”	Agree that provision for other B uses should be allowed for.	Amended wording of CS EM1 part c) to state, “Must consider providing additional B uses..”

LBC Comment	Response	Change
<p>“It is not possible to apply this requirement through planning policy and does not seem a reasonable proposal... It is unclear why it is considered appropriate that average rates for Central London should be applied to new accommodation in a near central/inner London location, which would be expected to have higher values. It is unclear why the 20 benchmark areas referenced on page 18 are considered to be suitable comparators for the Camley Street Area. Any benchmarks should be based on local or inner London rent levels for a reasonable comparison.”</p>	<p>Camden’s Local Plan is out of date in respect of its approach to affordable workspace. There is no guidance in the Local Plan on how below market rates ‘affordable rent’ should be. Therefore, the Forum have sought an alternative approach to ensuring the businesses are charged a fair rent.</p> <p>As evidenced within the CSNDP, the uses on the site are vital for the local area, Borough and CAZ. Therefore, this policy has been introduced in order to protect them from being unreasonably pushed out of the area due to inflation and rising rental prices as a result of higher land values for residential proposals. The location in which Camley Street is situated would be expected to have higher values than comparable light industrial locations within outer London. The policy seeks to encourage comparable businesses to locate and operate within the NP Area as a result of any new development proposal and/or existing businesses choosing to relocate, by ensuring that rents will not be so unaffordable they would have to locate elsewhere. The benchmark areas chosen reflect this aspiration to provide affordable industrial floorspace for existing and new businesses. ‘Regeneration’ is a circumstance that would allow affordable rents to be pursued under policy E3 of the London Plan.</p>	<p>No Change Necessary.</p>
<p>“Setting artificially low rental levels for businesses in the area, combined with other policies seeking to maximise affordable housing delivery and the provision of housing directly alongside employment uses will collectively put pressures on viability and is likely to put future development at risk. Redevelopment of sites for co-location, involving new housing typologies will also impose particular pressures on viability. If the Plan imposes an approach that is too onerous and inflexible, the ability to deliver the regeneration of the area is likely to be undermined.”</p>	<p>A viability study has been undertaken which demonstrates that co-locating residential, including affordable housing, and employment uses, including light industrial floorspace, as part of a mixed use development is viable.</p>	<p>No Change Necessary.</p>
<p>“It is unclear whether 50% is the right level of affordability... We would only be able to secure this space via a planning obligation where it is viable. This needs to be acknowledged in the neighbourhood plan.”</p>	<p>Understood that 50% may not be viable in all cases. Reference made to planning obligations.</p>	<p>Para 6.5.8 wording amended “(what will be considered ‘affordable workspace’ will vary according to a range of factors such as location, type, quality, management structure and viability, and be secured through planning obligations).”</p>

LBC Comment	Response	Change
<p>“It is not clear what evidence this is referring to. This needs to be cross-referenced, perhaps as a footnote.”</p>	<p>Consultation with the current businesses show the locational benefits they can achieve across a range of economic, social and environmental factors in being located close to their markets, and express the disadvantages in relocation to other places likely to be both further from their clients and detrimental to business. This evidence base will be submitted with the CSNDP in support of the employment policies.</p>	<p>No Change Necessary.</p>
<p>“Policy CS EM1 does not talk about mixed use/housing itself. It should be clearer that the plan policy is seeking to provide housing as part of mixed use redevelopment.”</p>	<p>EM1 is solely related to employment, thus it does not make reference to housing provision. The Forum’s aspiration for providing mixed-use development is stated within the supporting text and housing policy CS HO2.</p>	<p>The opening sentence of the policy objective amended to state, “The CSNDP recognises the specific redevelopment potential of the Plan area for a mix of land uses that retains land in industrial use whilst providing other uses, e.g. housing.”</p>
<p>“It is not clear what evidence this is referring to.”</p>	<p>As stated above, a consultation with the relevant named businesses was undertaken in order to understand their dependence on the specific location within Camley Street, their relationship with the Central Activities Zone and strategic links across London. This has informed the employment policies and supporting text.</p>	<p>No Change Necessary.</p>

LBC Comment	Response	Change
<p>“The Camden Local Plan refers to retaining existing businesses on site ‘as far as possible’. The London Plan Policy E2.B (2&amp;3) relates to relocation to alternative accommodation, not protection on the existing site. E7 D(4) says “suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. The London Plan, as with the Camden Plan, envisages that some relocation of businesses may be acceptable. Policy E7 does not refer to retaining existing businesses on site, only to uses.”</p>	<p>Only part 3 of draft Policy E2.B relates to relocation. Part 2 states that proposals should ensure “an equivalent amount of floorspace is re-provided...” E7 stipulates terms for relocation to suitable alternative accommodation. As evidenced, there is no suitable accommodation within reasonable proximity of the current site for the existing businesses. Furthermore, as stated by Camden above, “some of the uses are likely to be so specialist that comparable provision will not be realistic”. Therefore, by Camden’s own admission, the existing uses and by virtue of association, the existing businesses, should be retained on the site.</p> <p>Table 6.2 (Draft Policy E4) allocates LB Camden within the ‘retain capacity’ category with a general principle for ‘no net loss’. Therefore, Draft Policy E4 expects the retention of all designated and non-designated industrial sites within the Borough, which includes Camley Street.</p> <p>Draft Policy E7 (Part D) states that “mixed-use or residential development proposals on Non-Designated Industrial Sites should be supported where (1) there is no reasonable prospect of the site being used for the industrial and related purposes.” If LBC wish to promote the site for residential-led development and relocate the current uses (businesses) then they must be able to provide evidence that there is no reasonable prospect of the site being used for B1C or B8 uses. This does not appear to be a plausible scenario given that the principle aim of the CSNDP is the retention of the existing light industrial uses!</p>	<p>No Change Necessary.</p>

LBC Comment	Response	Change
<p>“It is not entirely clear what approach is being sought for these B8 uses: i.e. whether they should be retained if possible, or if the Plan is suggesting they might be appropriate uses for relocation elsewhere.”</p>	<p>Agree that clarity is required.</p>	<p>Supporting text to policy EM2 paragraph 6.7.1 has been changed to, ‘Some businesses, such as large-scale, higher-value distribution activities can move out of London to peripheral locations and strategic Industrial Locations (SILs) are filling up with both industrial and non-industrial activities (such as retail counters and leisure uses). Permitted development rights have also threatened centrally based employment sites. The types of business that suffer from these pressures, and find it more difficult to relocate and maintain their business, are found readily at Camley Street’.</p>
<p>“To support the identification of these businesses in the Neighbourhood Plan, evidence will be needed expanding on the nature of the relationship of each business with Central London and Camden.”</p>	<p>Agree that current evidence base needs strengthening. Refer to evidence within supporting text.</p>	<p>Supporting text para 6.7.7 amended to , ‘The list below sets out those businesses currently operating within Cedar Way that provide employment for Camden residents and that support the functioning of the Central Activities Zone. Through questionnaires, these businesses have demonstrated that they employ Camden residents and primarily serve businesses located in central London. The nature of their business would be difficult to undertake from a different location, even within Camden, as some of the operations require timely delivery, local supply chains or face to face relationships. In addition, their location benefits both employees and clients, who can reach them easily (particularly by public transport) and several benefit from the advantages of agglomeration to maintain trade within the local catchment’.</p>

LBC Comment	Response	Change
<p>“The Council considers there is not sufficient evidence to demonstrate a strong dependency between the businesses identified in the Plan with the CAZ. It is also unclear why a location on the fringes of central London is critical for their continuing operation... It is not possible to definitely conclude that relocation of the businesses would cause significant harm to their operation or viability in terms of the impact on existing supply chains or access to labour supply.”</p>	<p>Evidence referred to within paragraph 6.7.7 (as set out above).</p>	<p>No Change Necessary.</p>
<p>“It should also be noted that changes can occur within the B Use Class that do not require planning permission.”</p>	<p>Not considered a major issue given, temporary PD rights for change of use from B8 to C3 are subject to a number of criteria being met and also subject to prior approval. The prior approval date must also be before 10th June 2019, which does not seem likely.</p> <p>Limitations and conditions are also applied to PD change of use from B1C to C3 including prior approval, which must be before 1st October 2020.</p> <p>In order to benefit from PD rights, the current industrial uses would also need to be redundant and existing businesses require less floorspace, which is clearly not the case!</p>	<p>No Change Necessary.</p>
<p><b>Social infrastructure and viability</b></p>		
<p>“As there is limited/no existing social infrastructure in the area, it is unclear specifically what any contributions would fund.”</p>	<p>In the long term, the Forum will liaise with the Council to secure funding for necessary infrastructure.</p>	<p>No Change Necessary.</p>
<p>“It is important that the plan acknowledges viability throughout wherever reference is made to new/additional forms of social infrastructure. Cross reference in to the Plan” to the relevant CPG.</p>	<p>Noted.</p>	<p>Supporting text para 6.9.9 amended to read “The Forum acknowledge that funding is dependent on viability and will work with developers and the Council to promote projects and secure funding... The Draft Camden Developer Contributions CPG (November 2018) provides clarification on the size of schemes that will be expected to contribute to local infrastructure.”</p>

LBC Comment	Response	Change
<b>Core Objective 3 - Housing</b>		
“The Neighbourhood Plan presupposes what the ‘maximum viable quantum’ will be and has conflicting statements by on the hand saying the maximum viable amount of affordable housing is to be sought and then saying this should be a minimum of 50%.”	The Draft New London Plan expects a minimum of 50% affordable housing on publicly owned land. Therefore, the NDP is in line with higher policy.  The New Southwark Plan amended policies Jan 2019 version draft policy P1 states “development that creates 10 homes or less must provide the maximum viable amount with a minimum of 35% towards the delivery of new council social rented or intermediate homes subject to viability.”	Policy HO1 wording amended to state a minimum of 35% will be expected on non-publicly owned land.
“The Neighbourhood Plan also does not specifically state whether affordable housing should be provided on-site.”	Noted.	Policy HO1 wording amended, part a) “Delivering the maximum viable quantum of affordable housing on site...”
“Since shared ownership is not acceptable in Camden under planning policy, it is not considered that the 50% minimum would be an effective and viable approach.”	A viability assessment has been undertaken which confirms that 50% affordable housing is achievable.	No change necessary.
“The definition of affordable housing in the glossary would also need to be amended accordingly, cross-referencing the revised NPPF.”	Agreed.	Definition revised in line with the updated NPPF.
“The statement development should, where viability is demonstrated....” Conflicts with the policy itself which does not say that viability needs to be demonstrated.	Noted.	Reference has been made to viability within the supporting text, paragraphs 6.11.3 and 6.11.5
“It’s not clear what the difference is between single-use non-residential areas and commercial areas.”	Noted. Initially included due to the fact that commercial areas could contain C3.	Policy wording amended to read “Proposals to redevelop sites that currently support industrial uses, into mixed-use developments should provide at least 50% of all additional floor space created, of 1,000sqm or more, as self-contained housing where residential development is demonstrated to be compatible with other uses on the site in line with Local Plan Policy H2.”
“unclear whether the policy relates to floorspace or numbers of homes (bedspaces for student accommodation.)”	Note lack of clarity.	Policy HO3, clause a, wording amended to include “number of units.”
<b>Core Objective 5: Green Infrastructure</b>		
“there needs to be some flexibility to allow the spaces to be provided elsewhere.”	Noted.	Introduced line for re-provision within policy CS G1 clause B and supporting text paragraph 6.21.5. “Where loss is unavoidable, replacement of the same area, must be provided as a minimum, within close proximity to the existing green space.”

LBC Comment	Response	Change
“Approach is also inconsistent with Local Plan Policy A3 regarding non-TPO trees... Where poor quality trees are lost as a consequence of development, the Council will seek replacement planting, as per Policy A3.”	Noted.	Reference made to retention of good quality trees within policy GI1, clause c.
“the Neighbourhood Plan also cannot resist all development of gardens. This would be a ‘blanket ban’ and remove the ability of householders to undertake small-scale development such as extensions.”	The policy intention is not to restrict householders from building garden sheds etc., but to prevent poor quality, self-contained, residential development that would detract from the area and materially impact on the overall quantum of green space within the Neighbourhood Area.  The High Court Judgement (2016) determined that back gardens within urban areas should be classified as greenfield land, thus residential gardens are protected by policy within the NP.	Policy CS GI1 part E amended to make clear that self-contained residential development is the issue and not householder extensions.  Amended wording within supporting text (paragraph 6.21.8) to acknowledge PD rights for householders, “... small scale household development is permissible under the General Permitted Development Order (2015).”
“Local Nature Reserves are designated by Local Authorities, not nationally. (this is a factual error within the Local Plan.)”	Noted.	Supporting text paragraph 6.21.9 amended. “Camley Street Natural Park has the status within the Local Plan of a Designated Local Nature Reserve.”
“Cross reference to (Housing SPG) in the supporting text would assist users of the Plan.” Also reference CPG – Public Open Space.	Noted.	Reviewed and included reference to SPG and CPG guidance within the supporting text.
“Suggest this criterion is captured under ‘sustainable design’.”	Noted that some of the SUD’s measures listed don’t necessarily relate to biodiversity. However, the Forum believe promoting biodiversity is intrinsically linked to sustainable design. Therefore, reference to SUDs will be retained within policy GI3. Sustainable design is also referenced within the design quality policies.	SUD’s measures which contribute towards promoting biodiversity have been retained. Where they relate more to flood risk alleviation/climate change they have been removed.
<b>Other minor matters and clarifications</b>		
“Its role would be better expressed as setting out what makes the conservation area special and providing information about the types of alterations and development that are likely to be acceptable or unacceptable within it.”	Reviewed.	Paragraph 2.12 wording amended “The canal also has its own Conservation Area Appraisal and Management Strategy, which outlines particular special buildings and features within the area and provides information about the types of alterations and development that are likely to be acceptable within it.”

LBC Comment	Response	Change
"If building/features are listed or identified as positive contributors in the Conservation Area Appraisal, they will be protected, however, this could be read as going beyond that to protect any building/feature."	The wording is taken from the supporting text and is not policy.	No Change Necessary.
"Technically this is the Neighbourhood Area."	Noted.	Label amended.
Reference to Kings Cross OAPD	Noted.	Sub-section on emerging context - Kings Cross Opportunity Area included (para 2.55 - 2.58), which references the outline planning consent.
"More locally relevant information will be available for lower level Super Output Area... it will be necessary to find which of these areas fit closest to the area boundary. It would be helpful if the plan included reference to the total population of the neighbourhood area."	Noted.	LSOA data has been resourced and reviewed. Introduction and socio-economic text updated with more relevant data and information at LSOA level where there is information available. NB: there is not up to date data available for every topic.
"Should also mention NPPG"	Noted.	Amended to include NPPG.
"PPG has already been updated for some matters."	Noted.	Amended to include reference to relevant updates.
"Neither the SA nor the Policies Map technically form part of the Local Plan."	Noted.	Reference removed and text amended.
"We suggest that a reference is added in para 2.38"	Noted.	Wording amended to include reference to Neighbourhood Plan Examination Process and referendum.
"Hierarchy of planning policy page 8 – the box with local documents should show: the Camden Local Plan, Site Allocations and approved Neighbourhood Plans."	Agreed.	Diagram amended.
"Sub-Objective 4 suggests London Plan policy says that new residential development should be car free – this is not the case."	Noted.	Sub-objective 4 removed. Transport policy wording and supporting text amended in line with higher policy parking standards. Policy objective for Policy TR2 expects all development to be car free.
"There should be cross-reference here to the compliance check that will form part of the Basic Conditions Statement... could be inadvertently misleading by suggesting that the local plan policies are not strategic."	Noted.	Paragraph 6.2 amended to read "The policies within this Plan are fully compliant with UK-government policies within the NPPF, strategic and detailed policies in the London Plan and LB Camden Local Plan, as demonstrated within the Basic Conditions Statement submitted in support of the Plan."

LBC Comment	Response	Change
“It is unclear why delivery management plans are specifically referred to in the policy whereas Travel Management Plans-or Travel Plans- are only referenced in para 6.17.1...”	Concerns were raised by local residents at consultation events about noisy early morning deliveries and how this would be managed. As such, redevelopment proposals which intensify employment uses within the NP Area will be expected to demonstrate how they will mitigate the impact of deliveries and servicing.	No Change Necessary.
“CS TR1 part d) – this may not be realistic or achievable in every case; therefore we suggest adding the words “where practicable.””	Noted.	Policy wording amended to include ‘where possible’.
“it is surprising that CS TR1 does not specifically acknowledge greater use of the Regent’s Canal when this has been referenced as an objective in the supporting text.”	Noted. (comment seems contrary to next comment which discusses reference to Regents Canal..)	Reference made to utilising the Regents Canal as far as possible.
“...not factually correct. Para 10.31 of the Local Plan states that the Canal is thought to be an economically viable route.”	Noted.	Paragraph 6.17.3 amended to “LB Camden’s Local Plan Policy T4 and supporting text confirm that the use of the Regent’s Canal is <b>thought to be</b> an economically viable route for certain freight movements and new developments close to the canal should consider its use for the movement of goods and materials.”
“As there is not a parking policy in the CS NP, we suggest referencing this in policy CS TR2... Sub-objective 4 refers to car free in the context of new residential developments, whereas the Council will apply this to all types of development.”	Noted. Local Plan Parking Standards reviewed.	Sub-Objective 4 removed. Understood that car free development is already secured through higher policy. Policy Objective for TR2 now states “Future proposals are expected to be car free, apart from required Blue Badge Parking Spaces, in line with London Plan and Local Plan policies.” Policy TR2 encourages walking and cycling as the preferred transport mode within the area, therefore there is a presumption against the use of private cars.
“Suggest that the Neighbourhood Plan identifies priorities for investment and is explicit about how this relates to funding through the local proportion of the CIL.”	The CSNDP does not seek to secure individual infrastructure commitments. The Forum will identify and seek to secure opportunities in the future once the Plan has been Made.	No Change Necessary.

LBC Comment	Response	Change
“suitability of tall buildings cannot be considered against King’s Cross alone and the context of the area in full should also be considered.”	Noted. The Forum recognise that the built context surrounding Camley Street has evolved rapidly over the decade. As such, new proposals within the Neighbourhood Area should seek to not only respond to the immediate local context, but only sit comfortably alongside the wider context.	Policy DQ3 part amended to “Respond to the scale and grain of the wider context, including Kings Cross, Euston, York Road, Agar Grove etc. and the hierarchy of taller buildings in the area.”
“needs to be clear that tall buildings would need to be assessed against NP Policy DQ3 and Local Plan Policy D1.”	Noted.	Supporting text, paragraphs 5.31.2 and 5.31.3 amended to include reference to Local Plan policies and LVMF.
“NPPF definition should be updated.”	Noted.	Definition for revised NPPF included within the Glossary.
“Each policy does not require the prefix ‘CS’”	The policies relate specifically to Camley Street Neighbourhood Area, further, some of the acronyms are similar to higher policy so the prefix is a way to differentiate.	No Change Necessary.
“The plan could helpfully provide more acknowledgement of the Council’s role in securing apprenticeship and job brokerage and in particular the efforts to support STEAM industries and the knowledge quarter.”	The NDP has a specific role in protecting the existing B1C and B8 offer. There is already reference to the ‘knowledge quarter’ within the CSNDP.	No Change Necessary.

## Camden Council Asset Strategy and Valuations Team Comments Table

LBC Comment	Tibbalds/Forum Response	Change
<b>The Vision</b>		
“The vision in effect appears to say all new development in the area up to 2033 will need to deliver the following...”	Noted, not intention. Wording reviewed.	(Chapter 4) Vision wording amended to “New development over the Plan period will cumulatively help to deliver a number of objectives including, but not limited to the following...”
“the vision also seems to limit the employment vision to ‘industrial and commercial space’(the latter would normally cover uses such as shops and office), which appears contrary to the rest of the draft NP and evidence relied on.”	The Forum has openly stated within the Plan that mixed use redevelopment will be supported on the proviso that the current uses are retained.	No Change Necessary.
“...reads as an overly limiting aspiration that appears to unjustifiably and restrictively shape the objectives and policies that flow from it.”	The Forum disagree. The Plan proposals are not policy.	No Change Necessary.
“None of these are general industrial in terms of planning use classes. This specific use is not generally compatible with housing and giving this pre-eminence in the draft NP over other employment uses would not reflect the actual employment nature of the area...”	General industrial uses are not referenced within the Plan. B1C and B8 uses are given precedence within the NP Area.  New innovative design and construction techniques also demonstrate B1C uses can be compatible with C3 as demonstrated at 11 St Pancras Way.	No Change Necessary.
<b>Extent and nature of policies</b>		
“... what parts of policies and objectives apply across the whole area and which to certain sites or types of development and further clarification is considered essential.”	The CSNDP applies to the whole Neighbourhood Area, however, it is clear that certain policies will only apply within certain areas that are available for redevelopment. The CSNDP is not a site allocation and seeks to secure high quality, sustainable development across the entire Neighbourhood Area.	No Change Necessary.
“The NP as drafted currently implies mixed use redevelopment is being encouraged across the whole area, when that may not be the case or appropriate.”	Only for areas where redevelopment appears a likely option.	No Change Necessary.
“This is identified incorrectly on the area map (p4) as extending across other sites with different ownership and occupier interests.”	Noted.	Reviewed LB Ownership boundary and amended map.
<b>Core Objective 1 and Employment Policies</b>		
“It is not clear particular objectives and policies are intended to apply solely to this smaller Cedar Way Industrial Estate area or to a wider employment site area. We also note that 104 is excluded from the (albeit incorrectly) larger ‘Cedar Way Industrial Estate area.”	Noted.	Reviewed area boundary and amended map.

LBC Comment	Tibbalds/Forum Response	Change
“If more detailed and specific policies or requirements are to be applied solely to specific sites then we believe this could constitute a site allocation policy.”	The CSNDP applies to the entire Neighbourhood Area. Whilst there are clearly areas with greater redevelopment opportunity that have been identified on Figure 45, the Forum want to ensure that the requirement for high quality development that provides employment and affordable residential uses is applied across the Neighbourhood Area. There are no sites allocated within the CSNDP.	No Change Necessary.
“Proposals are currently unfeasible, non-policy compliant and undeliverable on many levels.”	The Forum wholly disagree with this statement. The proposals have been underpinned by a robust viability and feasibility study.	No Change Necessary.
“We find it hard to reconcile how ‘retention’ and ‘refurbishment’ of existing light industrial floorspace is a viable and deliverable option in delivering the draft NPs clearly stated support and aspirations for mixed use redevelopment including housing, co-location and new building typologies and successful intensification of employment sites.”	There is lots of evidence, including research produced and supported by the GLA, that demonstrates co-location feasible and given the current market in Central London and the loss of industrial sites within the inner London Boroughs, a sensible and necessary option.	No Change Necessary.
“The proposal as currently drafted would require that any development proposals within the area will be expected to provide new light industrial uses and new affordable homes, as well as community facilities, which presumably is not the intention and clearly not justifiable.”	Noted.	Reference has been made to the mixed use area identified on Figure 45 and mixed use/major development proposals where necessary. All proposals are expected to contribute to the Neighbourhood Area in terms of sustainable design.
“We understand that as a general principle neighbourhood plans can’t be used to make decisions on behalf of service providers (for example health, education or public transport).”	Not the Plan’s aim.	No Change Necessary.
“it is considered that proposals and policies should be appropriately qualified, e.g.; ‘where feasible’, ‘as far as possible’, ‘when viable’, ‘where justified’ etc...”	Noted.	Viability is referenced throughout the Plan, in particular in relation to the employment and housing policies.
“It is not clear if this is limited to sites that are solely in employment use or in part (e.g.; 103 Camley Street includes employment uses.”	The Draft New London Plan seeks to retain and increase employment floorspace in particular, light industrial floorspace (B1C and B8). Policy EM1 seeks to retain floorspace for all sites within the Neighbourhood Area that contain B1C or B8 floorspace. Policy EM1 is clarified with ‘where feasible’.	No Change Necessary.

LBC Comment	Tibbalds/Forum Response	Change
<p>“Requirements that go beyond policy and that do not relate to the potential development or use of land e.g.; policies related to setting rent levels or requiring particular terms of tenure for individual businesses, should be reconsidered or omitted altogether. This applies to draft Policy CS EM2.”</p>	<p>It is widely acknowledged that rent levels should be set for use class C3 (residential). As evidenced within the CSNDP, the uses on the site are vital for the local area, Borough and CAZ. Therefore, the policies are worded as such in order to protect them from being unreasonably pushed out of the area due to inflation and rising rental prices as a result of higher land values for residential proposals. Policy EM1 seeks to encourage comparable businesses to locate and operate within the NP Area as a result of any new development proposal and/or existing businesses choosing to relocate, by ensuring that rents will not be so unaffordable they would have to locate elsewhere. Greater London Average Rental Levels have been chosen to reflect this aspiration to provide affordable industrial floorspace for existing and new businesses.</p>	<p>No Change Necessary.</p>
<p>“whilst increasing employment floorspace may be a desirable objective, this part of the policy limiting an increase to solely B1C and B8 uses is unduly restrictive, unjustifiable and would not conform to policies. It also appears to contradict part c of the policy, which also requires additional floorspace for all Class B business uses.”</p>	<p>The nature of employment uses within the NP Area are B1C and B8, therefore it would make sense, in line with London Plan policies, to increase the proportion of employment floorspace within these uses. The Forum recognise that the location of the NP Area also lends itself to generic B1 office uses. Therefore, Policy EM1 allows for the provision and intensification of other B uses alongside retained light industrial uses.</p>	<p>No Change Necessary.</p>
<p>“Applied to all redevelopment of all employment sites in the area this policy as drafted imposes a prescriptive requirement to specifically design replacement floorspace suitable for meeting the operational needs of existing occupiers which, could in theory include occupiers who are short-term, may have plans to relocate or could relocate anytime in the future. This goes beyond policy requirements which relate to uses rather than occupiers.”</p>	<p>Policy EM2 recognises that some of the existing businesses may eventually choose to relocate. In light of this, the policy ensures that the vacant floorspace will be occupied by a comparable operator. Therefore, it is highly likely that the new user would require similar facilities to the previous operator and wouldn't be burdened by the retention of the existing floorspace.</p>	<p>No Change Necessary.</p>
<p>“The policy is predicated on an assumption all existing occupiers will stay and that other potential future occupiers will be of the same nature. In doing so the policy goes further to limit replacement space to ‘comparable new occupiers’ which in itself is both vague and in turn prescriptive, as it would require all replacement floorspace to be for a relatively narrow range of types of occupier.”</p>	<p>The key aim of the CSNDP is to retain the existing light industrial function of the area. Therefore, “requiring all replacement floorspace to be for a relatively narrow range of types of occupier” is considered to be a sensible approach in order to preserve the B1C and B8 uses.</p>	<p>No Change Necessary.</p>
<p>“The policy as framed would still require replacement floorspace to meet the needs of existing or ‘comparable’ occupiers, even in circumstances where sites and buildings are surplus to requirements or become vacant e.g.; through relocation of a business elsewhere.”</p>	<p>No, if businesses choose to relocate the policy would look to retain the floorspace for another operator within the same use class. As per the example used, the policy would require the replacement of the B1 floorspace, not the physical Camden office.</p>	<p>No Change Necessary.</p>

LBC Comment	Tibbalds/Forum Response	Change
<p>“The policy refers solely to replacement of businesses (Class B1) and industrial uses (Class B2) when the existing primary and authorised uses across employment sites are uses within business (Class B1), including light industrial (Class B1C), and offices, storage and distribution (Class B8) and sui generis mixed employment uses, so based on evidence the policy needs to (be) more precise, but sufficiently flexible, in order to be justifiable and deliverable.”</p>	<p>EM1 relates predominantly to B1C and B8 uses (part c acknowledges that general B uses may be acceptable and should be provided for SME’s). Reasoning for this has been demonstrated and justified.</p>	<p>No Change Necessary.</p>
<p>“rather than ‘business and industrial’ floorspace it could refer to ‘employment floorspace’ particularly given the latter uses is not the lawful use for any of the employment sites in the area. Industrial use by definition would also be incompatible with housing, which is being strongly promoted as part of the aspirations for the area...”</p>	<p>Noted. The principle aim of the Plan is to protect the existing B1C and B8 uses, which comes through very clearly and strongly within the EM policies and supporting text.</p>	<p>Amended Policy EM1 wording part a to “a) Must ensure that the amount of existing B1(c) light industrial employment floor space and B8 storage and distribution space present on a site is, as a minimum, maintained and preferably increased where feasible.”</p>
<p>“the aspiration to increase employment floorspace, whilst laudable, is not in general conformity with relevant policies and should be reframed as such.”</p>	<p>Reviewed and decision taken to make policy more flexible.</p>	<p>Added in ‘where feasible’ to part C.</p>
<p>“It is not considered legitimate or a planning policy matter to establish and limit the basis for the management of commercial properties... and in particular for setting rent levels, which will be established and negotiated on the basis of a number of factors... Any affordable workspace will be negotiated on a site by site basis and depending on circumstances and the amount and level of subsidy agreed will also depend of a number of factors and also being limited to office space as currently drafted in the policy appears overly prescriptive.”</p>	<p>The Forum consider that setting rent levels via planning policy is acceptable, as this has long been accepted for C3 uses.</p> <p>B1 is considered to be a compatible use with B1C and B8, therefore it is not considered limiting to request affordable office space alongside the existing uses.</p>	<p>No Change Necessary.</p>
<p>“it states that all existing businesses in the area... this policy would therefore extend not just to a prescribed list of businesses... but also the IT and start-up, incubator and move-on related businesses...”</p>	<p>The Policy relates only to businesses that can justify their contribution to the Borough’s employment offer and functioning of the CAZ. So doesn’t extend to all employment uses within the area.</p>	<p>Policy CS EM2 wording amended to read “those existing businesses within the NP area that both offer employment opportunity to Camden residents and support the functioning of London’s CAZ should be offered equivalent replacement space as part of the business and industrial space provision in any redevelopment proposals.”</p>
<p>“at the least, and in order to even support this as a plan aspiration, it would seem that further evidence would be needed to justify this approach...”</p>	<p>Reviewed existing evidence base. Agreed that as stands is not sufficient to justify the retention of the businesses. Consultation was undertaken with the businesses to understand the connection with the CAZ and employment offer within Camden.</p>	<p>No Change Necessary.</p>

LBC Comment	Tibbalds/Forum Response	Change
<b>Core Objective 2 and Social Infrastructure Policy</b>		
“all developments, regardless of their nature and impacts on social infrastructure, will be expected to either include on-site community facilities and/ or contribute towards improvements to the existing social infrastructure.”	Reviewed and agreed need to relate CS CSN1 to CIL.	Reference to CIL contributions included within policy objective for CS CSN1, paragraph 6.8.2 and supporting text paragraphs 6.9.8 and 6.9.9.
“any requirements should also be based more appropriately on a fuller assessment of existing social infrastructure and service provider plans to justify and support requirements for social and community infrastructure in the draft NP..”	Noted.	Forum to produce CIL funding wish list in the longer term. No Change Necessary.
<b>Core Objective 3: Housing and Policies</b>		
“wonder whether housing objectives and policies should precede the objectives and policies for social and community infrastructure?”	All policies have equal weight	No Change Necessary.
“it states that ‘a substantive amount of the housing should be for families.’ As well as not being qualified, we wonder whether this was intended to apply to affordable housing, where this would comply with housing mix policies.”	Noted and agree greater clarity is needed.	Policy objective wording to HO1, paragraph 6.10.1 amended to state “in order to meet assessed local need...” Provided evidence for this within supporting text paragraphs 6.11.6 and 6.11.8.
<b>Core Objective 5: Green Infrastructure</b>		
“the policy as worded would only apply to smaller amenity areas leaving larger amenity areas exempt.”  Example wording: “wherever possible and feasible, existing amenity areas, trees and vegetation with significant townscape, ecological or amenity value should be incorporated into the designs for redevelopment schemes and other significant environmental/infrastructure works.”	Reviewed.	Policy GI1, clause b, amended to state “existing open areas of townscape, amenity or ecological value should be incorporated into the designs for redevelopment schemes and/or infrastructure works. These existing areas should be enhanced where possible. Where loss is unavoidable, replacement of the same area, must be provided as a minimum, within close proximity to the existing green space.”
“these all sit within the sites promoted for redevelopment and as undesignated green spaces are covered by existing Local Plan Policy A2 Open Space.”	Noted.	Caveat provided within Policy GI1, clause B, for replacement where loss is unavoidable.
<b>Basic conditions</b>		
“The Plan context does not refer to the Local Plan designation of the Camley Street area as a growth area itself and the associated priorities in the adopted plan.”	Noted.	New section of the Growth Area included within paragraphs 2.23 - 2.25.

LBC Comment	Tibbalds/Forum Response	Change
“the plan will need to illustrate more clearly how it has considered, weighed up and conforms with relevant policies... The Plan needs to consider how it conforms to the respective growth area policy and the associated development plan priorities for the area. At the moment the Plan simply lists some development plan policies which it considers are relevant...”	Noted. Reviewed how higher policy is referred to throughout the Plan and deemed an acceptable approach. NB: within the Kentish Town NDP Camden and LP policies were simply listed as in the draft CSNDP. The Plan’s conformity with higher policy is addressed in the Basic Conditions Statement.	No Change Necessary.
“...draft new London Plan policies which will have relatively little weight at the moment.”	As seen in practice, the new London Plan is being applied as if adopted as stated by the GLA.	No Change Necessary.
“the area’s employment functions are more varied than just light industrial functions as indicated. Other employment activities and functions of other sites (including existing and under construction) such as creative industries, storage and wholesale distribution, managed start-up/incubator spaces/offices, IT facilities and other employment generating such as the garden centre and Council offices all contribute to a broader employment role of the neighbourhood.”	Demonstrates the point of protecting B1C and B8 uses.  The Forum acknowledge that other uses contribute to the NP area, as stated within the objective “development will ensure the neighbourhood’s continued function as a place of employment led by light industrial functions.” The objective as written does not discriminate against other employment uses, but highlights the role the existing light industrial uses should have within the context of redevelopment.	No Change Necessary.
“the objective limits itself to one site; the Cedar Way Estate.”	The Core Objective relates to the whole Neighbourhood Area. Sub-Objective 1 references the Cedar Way Industrial Estate given the specific, strategic role that the businesses within the estate play within the Neighbourhood Area, the Borough and Greater London.	No Change Necessary.
“Food production use, given sole and specific recognition for safeguarding on this one site, would fall outside a light use class where there could be an impact on residential amenity, particularly as part of comprehensive mixed use development, which the plan purports to support. Also storage use, also given sole and specific recognition for safeguarding on this one site, is a separate use to the light industry use class. Legitimate and compatible light industrial activities such as designer-makers (creative industries are a key sector in Camden) do not get a comparative level of support and there is insufficient evidence to justify the priority of certain uses (and named businesses) over others and why this applies solely to one small part of the plan area.”	The ‘design-makers’ are also protected under the EM policies. The Forum appreciate LBC’s acknowledgement of the contribution these operators make to the Borough.	No Change Necessary.
“It is also noted that the justification is related to the specialist nature of the identified activities serving across London, which does pose a question of why such uses then need to be safeguarded in this particular location as opposed to other uses.”	Gathered further evidence during consultation with the businesses relating to delivery times, sustainable travel, consumer base, location of employees etc.. to justify the need to remain within the Neighbourhood Area,	No Change Necessary.

LBC Comment	Tibbalds/Forum Response	Change
<p>“supporting the objective to improve public transport accessibility this relies on TFL giving priority and funding towards identified improvements, which may not be feasible at a time of well documented funding constraints in delivering other strategic priorities and the Council or NDP guarantee the delivery of such aspirations.”</p>	<p>The Forum are currently reviewing possible infrastructure opportunities for CIL monies. It is fully recognised that the highway improvements (S278 works) are outside the scope of planning obligations and CIL funding. However, given the potential uplift in population within the NDP in the event of major redevelopment, it is envisaged that funding towards public transport improvements may come forward.</p>	<p>No Change Necessary.</p>
<p>“Sub-objective 4 – this limits itself to applying car free policies in development plans only to new residential developments, when development plan policies also apply a car free principle for other types of new non-residential floorspace (alongside other parking and servicing standards). This objective if transferred into policy is not conformity.”</p>	<p>Noted, wording reviewed.</p>	<p>Sub-objective removed given that higher policy already sets parking standards. Reference to car free development for all proposals within the policy objective for TR2 (paragraph 6.18.2).</p>
<p>(Sub-objective 2) “the objective refers to ‘small pocket and linear parks’ when green spaces can take different forms depending on the nature of development and limiting this to example to ‘linear parks’ implies other forms of green space may not be acceptable and also implies there are publicly managed spaces when this may not be deliverable.”</p>	<p>Noted.</p>	<p>Sub-objectives under Core Objective 5, amended in line with policy wording changes.</p>
<p>“the key (figure 1) describes the land highlighted pale blue as industrial use when the authorised uses and broad types of activities are not in the general industrial use class. The pink shaded residential use area includes 103 Camley Street where the supermarket is highlighted, but not the employment space as part of the mixed use scheme (similar mixed use sites at 101 and 102 are included in the industrial area?”</p>	<p>Noted. Reviewed key labels.</p>	<p>Figure amended as follows: 103,101 and 102 now highlighted as ‘mixed use’. Industrial use amended to ‘light industrial/employment use.’ Other corrections/ additions include: Somers Town Bridge, Ugly Brown Building Masterplan Outline Area and amendments to land ownership boundaries.</p>
<p>“the plan notes the relatively low population density of the area in comparison to the rest of Camden, “in part due to the presence of employment premises including Cedar Way Industrial Estate.” The low density nature of existing housing in the area is also a contributory factor?”</p>	<p>Agreed. The Forum recognise the potential the NP Area presents in terms of higher density redevelopment, especially within the context of Kings Cross and Euston.</p>	<p>Paragraph 2.37 amended to state “However, the NP area has a relatively low population density in comparison to the rest of the borough. This low density is, in part, due to the presence of employment premises including Cedar Way Industrial Estate and also the low density nature of the existing housing within the Neighbourhood Area.”</p>

LBC Comment	Tibbalds/Forum Response	Change
<p>“This is not true in the sense that current employment premises are not industrial (the authorised uses are for B1C light industrial and B8 use classes) and Cedar Way Estate comprises a relatively small areas of c0.9ha within the overall land area of employment premises. If this is a reference to a broad industrial appearance of employment sites in general rather than use of employment premises then this should be clarified.”</p>	<p>The Forum take light industrial to fall into the broad category of ‘industrial uses’. The introduction is not policy and therefore, the Forum do not believe any change is necessary.</p>	<p>No Change Necessary</p>



