

Camley Street Neighbourhood Development Plan (2019 - 2034)

Submission version



July 2019

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List of Policies

List of Policies set out in this Neighbourhood Development Plan

Employment

- CS EM1 - Employment Floorspace Provision
- CS EM2 - Retention of Existing Businesses

Local Community and Social Needs

- CS CSN1 - Social infrastructure Provision

Housing

- CS HO1 - Affordable Housing Provision
- CS HO2 - Residential Provision in Mixed-Use Development
- CS HO3 - Student Accommodation

Sustainable Transport

- CS TR1 - Managing Industrial Traffic
- CS TR2 - Encouraging Walking and Cycling

Green Infrastructure

- CS GI1 - Protection and Enhancement of Existing Open Spaces
- CS GI2 - New Open Space Provision
- CS GI3 - Promoting Biodiversity

Design Quality

- CS DQ1 - Responding to Places
- CS DQ2 - Connectivity, Accessibility and Legibility
- CS DQ3 - Proposals for Tall Buildings

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Transport for London
Aecom
Businesses and Residents within the Neighbourhood Area

1 Statement from the Chairman

Hello!

Over the last six years, several hundred people from the Camley Street Neighbourhood area have contributed to this document. Their input has been structured and augmented by some of the foremost planning professionals in the country.

This, then, is an important document for many, and especially for two groups of people. First, 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 on Camley Street.

Finally, in this time of climate emergency I believe this plan, by transparently integrating the social, financial and environmental needs of our community will help inspire the vital move to a sustainable future.

I commend it then to you and ask for your support.

Alex Smith

Chair, Camley Street Neighbourhood Forum



2 Introduction and Neighbourhood Planning Process

Introduction

- 2.1 The Localism Act 2011 passed new rights to communities including the ability to produce a Neighbourhood Plan. As a result of this change, the Camley Street Neighbourhood Forum (The Forum) was first designated in February 2014 by the London Borough of Camden. The Forum has since been re-designated on 10th May 2019.
- 2.2 The Forum's shared objective is to make the neighbourhood an area that's economically vibrant, socially connected and secure: the greenest, safest place to live and work that it could possibly be.
- 2.3 In pursuit of this objective, the Forum has sought the views of residents and businesses. Based on responses, it has developed the Camley Street Neighbourhood Development Plan (CSNDP). The evidence base for the Neighbourhood Plan may be reviewed at <http://camleystreet.org.uk>.
- 2.4 The CSNDP sets out a vision and associated policies that are intended to help shape and guide the future development of the area.
- 2.5 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 that any adverse impacts associated with an increase in intensity of development are managed and mitigated.
- 2.6 In addition, the Forum wants to ensure that the existing light-industrial business community is retained, its activities successfully integrated into new mixed-use buildings, and that the operational requirements of such businesses are accommodated in any future re-planning of the area.
- 2.7 Finally, the Forum is acutely aware that the preparation of this Plan creates an opportunity to set ambitious environmental targets for future development to ensure that the carbon footprint of such development is minimised.

The Neighbourhood Plan Area

- 2.8 Camley Street is a unique and distinct area of Camden and London. Isolated by strategic transport links provided by the Regent's Canal and railway lines, yet within walking distance of central London, it provides home for a small number of residents and a cluster of small businesses, many of which use the location to supply Central London's economy.
- 2.9 Perhaps because of their proximity to one another, the residents and businesses have formed a close and symbiotic relationship and often find themselves with shared problems and opportunities. One outcome of this is the Neighbourhood Forum – business-led, but with the interests of the community and the area at the forefront.
- 2.10 The Camley Street Neighbourhood Area (the NP Area) is located within the St. Pancras and Somers Town ward in the London Borough of Camden. The area comprises a mix of uses including residential, industrial and light industrial, retail and some social facilities. Railway lines serving King's Cross and St. Pancras International stations cut across the Area and create a physical barrier to the north-east, along the length of the Cedar Way Industrial Estate.
- 2.11 Camley Street itself is a key north-south route running through the Area and is well used by local residents and businesses. The street is a key connection, but also segregates areas to the west and east. Thus, there is considerable scope to improve the quality and safety of this route for pedestrians and cyclists and to reduce severance through the introduction of better street lighting, (particularly along the route beneath the Channel Tunnel Rail Link/Midland Main Line bridge), hard and soft landscaping, tree planting and new signage.
- 2.12 The Regent's Canal, a designated Green Chain and Corridor and Site of Metropolitan Importance for Nature Conservation, cuts through the middle of the site. Historically, the canal has been a transport route for water-borne traffic, in particular for the movement of goods and freight. It is also a vital green space within the local and wider Camden area. Today, it is the main pedestrian and cycle route linking the

The Camley Street Neighbourhood Area

The Neighbourhood Area was formally re-designated by LB Camden in 2019. The extent of the Neighbourhood Area is shown below.

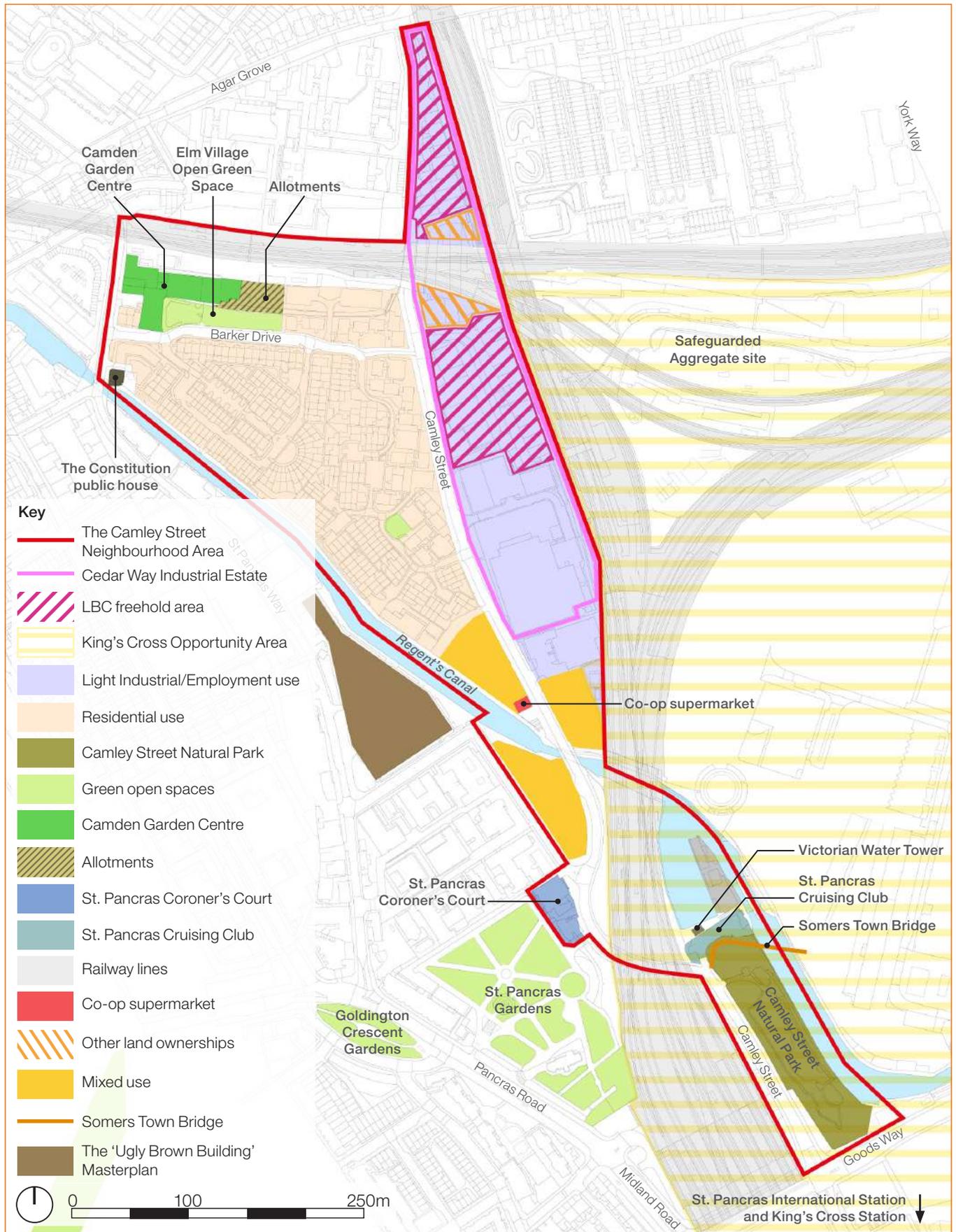


Figure 1: The Camley Street Neighbourhood Area (NB: Land ownership boundaries are not exact)

Neighbourhood Area with major tourist attractions such as London Zoo and Regents Park, and with Camden Town. The stretch of the canal along Camley Street is also part of the Regents Canal Conservation and subject to requirements and guidance provided within the Regents Canal Conservation Area Appraisal and Management Strategy (September 2008), 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. It is noted that the buildings currently lining the canal within the Neighbourhood Area have a predominantly industrial and mercantile character, and that the buildings' features contributing to this character should be retained and enhanced. It is, however, also acknowledged that the canal has become under-used in recent years due to its isolation and the poor access to and from the surrounding area, leading to increased potential for crime and anti-social behaviour. A key objective of this Plan will be to help overcome such problems.

- 2.13 Camley Street Natural Park, a designated Open Space, lies to the south, alongside the western bank of the canal. The Park is a Site of Importance for Nature Conservation, and a statutory Local Nature Reserve. The park is run by the London Wildlife Trust and was created in 1984 from an old coal yard. As a result of the new development at King's Cross, a new pedestrian bridge has been created, making the park more easily accessible from the Neighbourhood Area north of the canal.

Site History

- 2.14 Originally called Cambridge Street, and renamed by the London County Council, Camley Street is the main route through the Neighbourhood Forum area, linking Goods Way in the south to Agar Grove in the north.
- 2.15 Before industrialisation through the 18th and 19th centuries, the land which now forms the Camley Street Neighbourhood Plan Area was part of the Middlesex woodlands. Euston Road (the 'New Road' until 1857) opened up the wider area to development in 1756, but the opening of the Regent's Canal in 1820 allowed industry to flourish. Between the 1830s and 1880s,

the canal was carrying over a million tons of goods per year, including fuel, building materials and food and drink.

- 2.16 In 1824, the Imperial Gas and Coke Company developed a gas works on the south side of the canal – roughly at the current junction of Goods Way and Camley Street – and so began the clustering of noxious industrial uses into the 'King's Cross' area (named after the statue of George IV erected at the Battle Bridge crossroads). The Great Northern Railway bought land to the north and south of the canal in 1849, and the area to the east of the Neighbourhood Plan Area became a goods yard and railway depot, criss-crossed with railways and the location of engine sheds.
- 2.17 Somers Town, to the west, became occupied by the homes of the railway and industrial workers, and land between Somers Town and the Great Northern goods yard was leased to workmen to build their own homes. Agar Town, as it was known, was named after the landowner, William Agar.
- 2.18 The Midland Railway decided to develop its own London terminus in 1862, the line coming in at height over the Regent's Canal into what became known as St. Pancras, sweeping away Agar Town in the process. It also located its goods yard and railway sheds north of the canal, and they occupied much of the Neighbourhood Plan Area from the late 19th Century. With the lines out of St. Pancras, the east-west line between Highbury and Camden (run by the London Midland Scottish company) to the north and the Regent's Canal running to the west, the Camley Street area was now defined as it remains today. The Constitution pub was established during this period, and backed onto the railway yards to the east.
- 2.19 Cambridge Street allowed access to the 'railway lands' from the gas works towards the Ale and Porter Store (now the site of the Ugly Brown Building) and over the canal at the Oblique Bridge into the Goods Depot, a route which is now elongated to form Camley Street.
- 2.20 Between The Constitution and the Oblique Bridge, the Regent's Canal has a poor relationship with the Camley Street area, the land having being elevated above the canal to allow trains to cross the canal; Reapers Close was the point at which a railway bridge

crossed the canal to the Ale and Porter store. This stretch of canal is now one of the longest on the canal without an access and as a result feels rather isolated, a point noted by the Regent's Canal Conservation Area Appraisal (page 21: Gray's Inn Bridge to the Oblique Bridge).

- 2.21 Following the war came modernisation and nationalisation of the railway and the decline of rail freight. This reached a nadir in the 1980s, when many of the rail lines around King's Cross and Camley Street were lifted and many buildings found themselves underused, neglected or derelict. King's Cross, and the surrounding areas became a by-word for nightlife and clubbing and creative industries as well as a notorious hotspot for crime, unemployment and prostitution.
- 2.22 Whilst the land east of the Midland Railway has gone through a dramatic turnaround in the last twenty years, the Camley Street area has not. Land within the Area was developed as housing during the 1980s, with Elm Village aping the Hampstead style of mews, streets and crescents and winning architectural awards at the time. Cedar Way was developed as a small industrial estate, and attracted small and medium businesses that benefited from the proximity to central London as well as Camden's community.

Camley Street Growth Area

- 2.23 Camden's Local Plan introduces an aspiration for redevelopment within the Camley Street Growth Area, however, there is no clear area boundary. The broad 'Camley Street Area' is identified as an area "undergoing significant change". The Plan states that within "this changing context, the current employment premises at Camley Street fail to make the most efficient use of land. However, the area is also isolated and relatively inaccessible given its location, and this would need to be addressed alongside change in the area." (LBC Local Plan, Paragraphs 2.68 - 2.72)
- 2.24 The Forum also recognises the opportunity for positive, sustainable redevelopment within the Neighbourhood

Area, which is detailed throughout this Neighbourhood Development Plan.

- 2.25 The Council plans to publish an SPD outlining its aspirations for the wider Camley Street Growth Area later this year.

Camley Street Natural Park

- 2.26 East of the Midland Railway, the St. Pancras yacht basin was a mooring point for the barges bringing goods into the area during the 19th century, and a point for loading ash from the railway engines onto the canal for disposal. The land between the canal and Goods Way was occupied by further railway sheds associated with St. Pancras station until their demise in the 1970s.
- 2.27 Subsequently colonised by nature, the land was bought by the former Greater London Council (GLC) in 1981 to be turned into a lorry park. Local people and the London Wildlife Trust ran a successful campaign to persuade the GLC to save the flower-rich wasteland from development, and create a nature reserve instead. Starting in 1983, GLC worked with the Trust to re-landscape the reserve and install a visitor centre to deliver environmental education; Camley Street Natural Park was opened by GLC leader Ken Livingstone in 1985. This innovative inner-city oasis – a symbol of the urban nature conservation movement of the time – was declared a statutory Local Nature Reserve in 1986, and has subsequently been visited by people from around the world.

Camley Street and Food

- 2.28 The wider King's Cross/St. Pancras area could justly be termed 'the knowledge quarter', given the arrival there of firms working in the digital industries, and the proximity of University College London and the British Library. It could also justly be termed the 'med/science quarter', given the presence of the Francis Crick Institute, the proximity of University College London Hospital, the Wellcome Trust and the Royal Veterinary College, and the likely redevelopment of the St. Pancras Hospital site. There is an equally strong case

that a part of the area could justly be termed the ‘food quarter’, given the central importance of the supply of food to a host of outlets in Camden.

2.29 Camden’s Local Plan states that the borough ‘has one of the most successful economies in the country: home to 24,000 businesses and over 300,000 jobs’. The success of its economy relies on the wide variety of employment sectors including professional and business services, the “knowledge economy” and creative industries such as design, fashion and publishing. Camden also has a large number of jobs in the health sector, hotels and restaurants, legal services, and transport and distribution.’ (Camden Local Plan 2017, para. 5.1, page 164)

2.30 Of the figure of 24,000 businesses quoted in the Local Plan, over 2,900 are in the food services sector. The average number of employees per business in this sector is 17. So nearly 50,000 people are employed in the sector in Camden. London more widely is the largest and most popular dining destination in Europe. It is a very competitive place for food service providers.

2.31 The concentration of knowledge industries, educational, scientific and health institutions and food outlets provides a major opportunity for the development of the ‘food quarter’ which we envisage, serving all those working in those places, and contributing to the development of their work. In particular, there are connections between food and high-tech modes of communication, and between food and health.

2.32 This kind of integration of high-tech and food has potential within the Neighbourhood Plan Area. Currently, there is a significant move towards integrating high-tech and food, in Camden and elsewhere; e.g. Deliveroo and Just Eat. In early 2018, The Grocer magazine reported that food and drink businesses had in the previous year secured £23 million from crowd-funding sources like Crowdcube: almost 20% of all crowd-funding initiatives in that period (The Grocer, 27 January 2018).

2.33 For example, if one or more of the food delivery businesses such as Deliveroo or Just Eat were to establish a kitchen on the developed site, it could be

combined with a retail outlet used by residents on the site and those living nearby on Camley Street and in Elm Village.

2.34 The close relation between the quality of food and human health is beyond dispute. Put negatively, many of the developed world’s most troubling conditions and diseases – obesity, diabetes, heart disease, various cancers – are definitively linked to eating the wrong kinds of food too much and too often.

2.35 With major health institutions on the doorstep, all of which communicate clear messages to the local community about healthier eating, it seems obvious that an expanded group of businesses supplying healthier food could be a significant contributor to the effective realisation of these messages.

Socio-economic Context

2.36 The NP area and the wider Somers Town area are surrounded by new developments delivering major changes, most notably at Euston and King’s Cross/St Pancras. There is an acknowledged desire to ensure that the benefits of these new developments also accrue to the areas and communities surrounding the development areas.

2.37 Somers Town and St. Pancras ward had a population of 12,500 people in 2011. This is predicted to rise to 18,100 residents by 2021. 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.

2.38 The average annual household income in December 2015 within the ward was significantly lower than the borough average: £31,472 compared to £52,962. Further, the percentage of working-age adults recorded as economically inactive was almost 13% higher than that of Camden overall (44.3% compared to 31.9%).

2.39 There was also a disproportionately high number of families within the ward receiving tax credits, 91%, in comparison to the borough average of 61.1%. From this it may be inferred that there are levels of socio-economic deprivation within the area that need addressing.

Employment

2.40 The NP area has a significant industrial presence, predominantly located within the Cedar Way Industrial Estate towards the north-east. Although not designated as a Strategic Industrial Location within the Development Plan, the Plan does recognise that the Cedar Way Industrial Estate represents an opportunity to “make more efficient and intensive use of land, taking opportunities to provide a mix of uses” (Para 2.72) and improve connectivity and accessibility. Given the nature of the existing businesses, the below-average incomes and employment inactivity levels in the area, a key focus of the CSNDP’s content has been on the protection and enhancement of existing businesses, the creation of new businesses and of the conditions whereby existing residents can access new jobs.

2.41 The rest of the Plan area is largely dominated by residential uses. There is a noticeable lack of retail services and other uses, perhaps due to competition from larger nearby local centres including Camden Town and King’s Cross/St Pancras.

Housing

2.42 Within the ward the tenure split according to the 2011 census comprised:

Tenure	St P & ST	LB Camden	England and Wales
Owner Occupied	16.7	32.9	63.6
Social Rent	45.2	23.0	9.5
Housing Association	16.0	10.1	8.2
Private Rent/ Rent Free	22.0	34.0	18.1

Table 1: Tenure Split at ward, borough and national level

2.43 The Housing Affordability Ratio for the NP area (as shown within the Camley Street evidence base IX)

demonstrates that the area is slightly more affordable than the London Borough of Camden as a whole; however, it remains less affordable than the inner-London average. The table above indicates a high proportion of social rented housing within the ward. Owner occupation and private rented levels were the lowest within the ward and demonstrably lower than the borough and national average.

2.44 As part of a survey conducted in 2015 in support of the CSNDP, housing was viewed as the greatest priority in the area (32.1% of 293 people surveyed), slightly higher than employment (25.9%), shops (20.5%) and commercial leisure (20.1%). 38.8% of respondents surveyed (out of 178 responses) felt that there was a need for more affordable family housing in the area.

2.45 There is also a notable student presence within the ward. 1.1% of all households are students, in comparison to 0.9% for Camden and 0.4% for England and Wales (data taken from Open Data Camden, 2015).

Camley Street Demographics

(Data taken from Datashine.org.uk (2011 census))

2.46 The NP area is a diverse and active area with a range of employment types, housing tenures and age groups. The area had a population of just over 1000 people when the most recent census was taken in 2011; however, this is likely to have increased since then. 59.4% of residents in the area are between the ages of 16 and 44, resulting in a relatively young demographic compared to the wider Camden area. People above the age of 60 make up just 9.5% of the population in Camley Street, compared to 15.1% across Camden as a whole.

2.47 61.7% of residents identify as White; however, there are also significant Bangladeshi, African and Arab communities in the area. Only 68% of local residents would class their main language as English; other languages such as Arabic and Bengali are widely spoken. This leads to the Camley Street area having a more diverse population in terms of ethnicity, identity, language and religion compared to Camden as a whole.

- 2.48 Nearly three quarters of the residents of the Neighbourhood area are economically active, higher than Camden as a whole. 27.8% of residents are economically inactive, but of this proportion 10.9% are students. This student population is spread unevenly across the area, with a higher concentration of full-time students towards the south end of Camley Street compared to the north. This is a lower overall share compared to Camden as a whole, which has a higher student population due to its popularity with students from nearby universities such as UCL. Significant areas of employment in the NP area are food production, motor vehicle repair and garages, and – towards the south – transport and storage, which are uncommon in the wider area. The area is generally well qualified, with only 11.1% of respondents having no qualifications, and 49.7% of people having Level 4 qualifications (Certificate of Higher Education, Higher Apprenticeship etc.) or higher.
- 2.49 The household tenure of the area shows higher levels of shared ownership properties (7.4%) compared to the Camden average (0.7%). 24.9% of households are social rented, which is nearly 10% lower than the wider Camden Area. As a result there are higher proportions of private rented and privately owned households in the area. Social rented housing is concentrated to the south of Camley Street, whereas private renting and private ownership are concentrated around the Cedar Way Estate and the properties on Weavers Way.
- 2.50 This range of activities and people requires the Neighbourhood Plan to respond carefully to the needs of the local residents, and introduce change in a sensitive manner.

Environmental Quality

- 2.51 50% of residents surveyed in 2015 agreed that they have good access to green space in the area. This is highlighted by the green space per head of population figure for Camley Street, which is approximately 27.5sqm/per person and higher than the overall Camden average of 20sqm/per person. However, there is currently an imbalance in the locations of open spaces: for example, residents along Barker Drive are well served, whereas those in the Weavers Way

flats are less so. Currently, local initiatives run by the Neighbourhood Forum, including Camley Street Green Way, are looking to address this imbalance and make the area greener.

- 2.52 A natural capital account assessment of Camley Street Natural Park undertaken in 2015 showed that its habitats provided an estimated £2.8m of benefits to the locality annually. This was largely calculated on the basis of cultural services, particularly: enhancing the local environment and property market for residents, visitors and businesses; supporting individuals and communities through volunteering and employment; and supporting visitor spend within the local economy. (Ref: Guest, J. (2015) Camley Street Natural Park: Ecosystem Services Valuation, WS Atkins).

Transport

- 2.53 Despite close links to major centres and transport hubs such as King's Cross, Euston and Camden Town, the Public Transport Accessibility Level ratings for the area vary from 1b (poor) to 6b (excellent), based on proximity to public transport and the frequency of services. The areas within the Neighbourhood Area that are classified as poor are located towards the north-east, indicating a need for improved access to new bus services.
- 2.54 In addition, 68% of households within the Plan area do not own a private vehicle and therefore rely solely on public transport, walking or cycling to travel. 51% of residents surveyed stated a need for improved bus services within the area, including an additional bus stop along St. Pancras Way.

Emerging Context - King's Cross Opportunity Area

- 2.55 King's Cross is identified as an Opportunity Area in the London Plan (2012), which has an indicative employment capacity of 25,000 and is allocated to deliver a minimum of 1,900 new homes. It has also been identified as a growth area by the London Borough of Camden. Recent significant investments in the area have brought major transport improvements and will continue to bring further benefits, in particular through the provision of better public spaces and

community facilities, additional housing, hotels and retail outlets, which, in turn, will increase employment opportunities.

- 2.56 The King's Cross Opportunity Area Planning and Development brief was adopted by Camden and Islington Council in 2004 and informed the overall Masterplan for the redevelopment of the King's Cross OA.
- 2.57 The Masterplan for King's Cross was granted Outline Planning Consent in December 2006 (ref: 2004/2307/P). The brief recommended that the canal tow-path, where it passes under bridges at Camley Street and York Way, requires improvement including the introduction of a new walkway and improved street lighting. As part of the Masterplan, a series of improvements was made to a number of public open spaces along the Regent's Canal, easing the pedestrian connectivity across the canal to wider areas of Somers Town.
- 2.58 The brief also identified notable views: from Maiden Lane bridge (on York Way) to the Granary, Coal and Fish Offices and Camley Street Natural Park, and from Camley Street to St. Pancras station, Barlow Shed and the St. Pancras extension. Development proposals that will create new views towards important local features such as Camley Street Natural Park are encouraged.

Camden High Line

- 2.59 The Camden High Line was suggested by blogger Oliver O'Brien in 2015 and is being actively pursued by the Camden Town Unlimited BID. The aim is to create a linear, green and open walkway between King's Cross and Camden Town. The route would utilise a disused railway line that runs alongside the existing Overground route. O'Brien identified a route whose eastern end terminated at Camley Street, using the existing stairs towards the northern end of Camley Street on the north side of the railway.

Neighbourhood Planning in Practice

- 2.60 Neighbourhood Development Plans (NDPs) are statutory documents which set out policies in relation to development within a particular neighbourhood area (Schedule 9, Localism Act 2011, Chapter 20). Section 38A (Para 2) of the Planning and Compulsory Purchase Act (2004 as updated) states that “a “neighbourhood development plan” is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan.”
- 2.61 All Neighbourhood Development Plans must meet the ‘basic conditions’ set out within Town and Country Planning Act, 1990 (Schedule 4B, Paragraph 8, Sub-Section 2), which state that the Plan should be in general conformity with strategic local planning policy, have regard to national policy, contribute towards sustainable development and be compatible with EU obligations.
- 2.62 The relevant strategic policy documents the CSNDP must be in conformity with are the adopted and draft London Plan and the London Borough of Camden Local Plan. The CSNDP is also expected to have regard to national policy, which is the National Planning Policy Framework in England.
- 2.63 National Planning Policy: The National Planning Policy Framework (NPPF) provides a consolidated framework of the Government’s planning policies for England, and guidance on how these should be applied appropriately. The new NPPF was published on 24 July 2018, (and subsequently updated on 19th February 2019) following a period of public consultation. The framework outlines requirements for both Local Authorities and developers, including the need to plan for future growth and sustainable development. In particular, the framework provides further clarity on the Government’s proposals for solving the current housing crisis. Planning Practice Guidance, where necessary, has been updated to reflect the changes in the new framework including: ‘Before submitting an application’, ‘Build to Rent’, ‘Climate Change’, ‘Community Infrastructure Levy’, ‘Consultation and Pre-decision Matters’, ‘Determining

a Planning Application’, ‘Environmental Impact Assessment’ and ‘Fees for planning applications’ amongst others.

- 2.64 Regional Planning Policy: The Minor Alterations London Plan (MALP) was adopted in March 2016 and updated the 2011 London Plan with relevant policies, guidance and national legislation that have been introduced since 2011. The London Plan contains a number of policies that outline the Mayor’s expectations for borough councils, including the need to plan for sustainable development and accommodating growth.
- 2.65 The Mayor published his minor suggested changes version in August 2018 for Examination in Public (EIP). The EIP finished in May and the Consolidated Changes Version Draft London Plan was published in July, including modifications suggested at EIP. It is envisaged that the Plan will be adopted later this year.

Hierarchy of Planning Policy



- 2.66 Planning policy is given greater weight as it moves through the adoption process. Thus, the Draft London Plan has also been given material consideration during the preparation of the CSNDP.
- 2.67 Local Planning Policy: The London Borough of Camden's Local Plan was adopted in July 2017. The Plan is the primary local development plan document and sets out policies regarding future development and use of land in Camden.
- 2.68 The Planning and Compulsory Purchase Act (PCPA) 2004 (as updated) schedule 38A, Part 3 sets out the process for the 'making' of a neighbourhood development plan (subject to the modifications set out in section 38A(3)) including "provision for independent examination... proposed by qualifying bodies, and provision for the holding of referendums" by those bodies.
- 2.69 Where the CSNDP is found to be 'sound' by an independent examiner and following a positive result at public referendum ("more than half of those voting have voted in favour of the plan") the local planning authority (LB Camden) "must make the plan as soon as reasonably practicable after the referendum is held" unless they believe that the making of the plan would breach any EU obligation or any of the Convention Rights in accordance with the Human Rights Act 1998. (PCPA, Schedule 38A(4))
- 2.70 Once 'made', the Camley Street NDP will form part of the statutory development plan for Camden and will be referred to by the planning department when determining the acceptability of future planning applications.

3 Summary of Key Issues

Initial Consultation Responses

3.1 As part of the Evidence Base that supports the CSNDP, residents and businesses were surveyed in 2015 in order to ascertain local views on the Plan area. The observations that came out of the survey are summarised below:

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 calm, 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 for 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 two km 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 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. There were requests for a more robust regime for dealing with waste. Areas noted as being particularly poor include the road under the Camley Street railway bridge, the junction of Camley Street and Barker Drive, 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.
- There is a current imbalance in locations of open spaces. Residents at Barker Drive are well served, but those in the Weavers Way flats are not.
- There were calls for bus services along St. Pancras Way and improved cycle infrastructure; over half of respondents (51%) wanted improved bus services and an additional 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.

Views on planning for the future of the area include:

- A 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 by 32% of those surveyed, with employment uses second at 25.9%, shops at 20.5% and leisure at 20.1%.

Summary of key issues

3.2 The views expressed by local people have helped to inform the proposals for the Plan area. In summary and based on feedback received, the key issues the NDP seeks to address include:

- Reinforcing the area's role as a place of employment, retaining the current range of businesses, and providing opportunities for existing and new businesses to grow and flourish.
- Providing the social infrastructure required to improve well-being and quality of life across the neighbourhood, accessible to all residents.
- Providing a range of housing types and sizes that are genuinely affordable to local people.
- Improving the quality and range of green spaces across the neighbourhood, particularly in areas lacking access to high-quality spaces.
- Improving the quality of the local environment in terms of design, landscape improvements and pedestrian and cyclist comfort and accessibility.



Figure 2: Image from Harvest Festival Event Autumn 2018

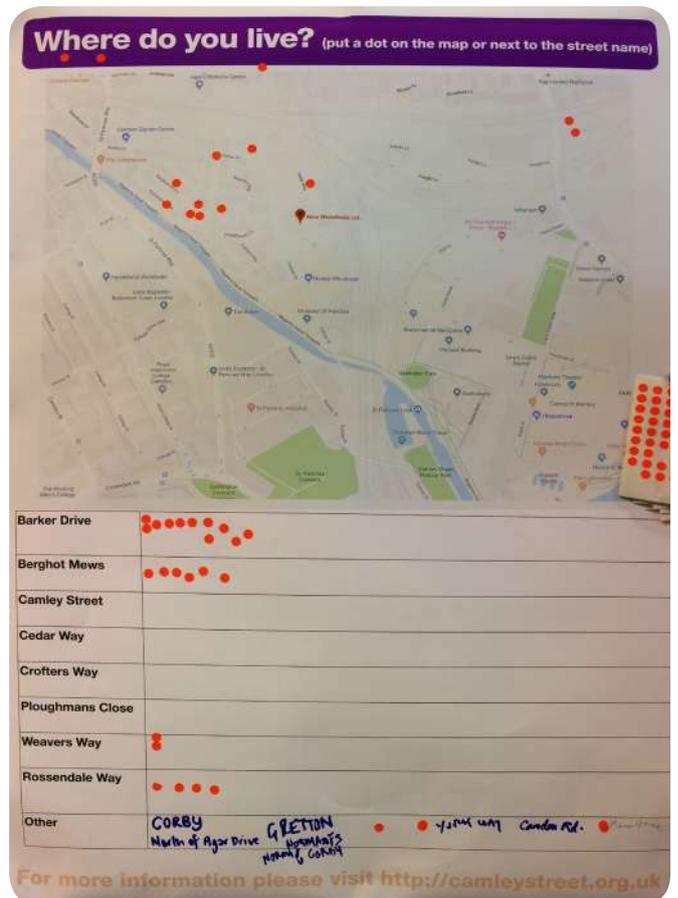


Figure 3: Image of Map of Responses from Harvest Festival event Autumn 2018

Regulation 14 Consultation Responses

3.3 Statutory consultation on the draft pre-submission Plan was undertaken from 28th November 2018 to 13th January 2019, in line with the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The main aim of this consultation was to introduce local people to the proposed Neighbourhood Development Plan and the policies within it.

3.4 115 responses were received from residents, local businesses, key stakeholders and statutory consultees on the draft Plan. A summary of the responses to each key policy area, core objective and sub-objectives and associated policies is set out below:

Employment:

- 84% of respondents strongly agreed or agreed with the proposed employment core objective, sub-objectives and associated policies
- Most respondents welcomed the idea of business retention and new employment uses within the Neighbourhood Area. However, there were concerns raised in relation to the noise and transport impacts the businesses had on residents and how this would be mitigated.

Social Infrastructure:

- 80% of respondents strongly agreed or agreed with the proposed social infrastructure core objective, sub-objective and associated policy.
- There was a strong feeling that community spirit was high within the Neighbourhood Area and opportunities for social interaction should be actively encouraged.
- The importance of existing community assets such as Camden Garden Centre was also noted.

Housing:

- 80% of respondents strongly agreed or agreed with the proposed housing core objective, sub-objectives and associated policies.

- There was strong support for the provision of affordable housing, including affordable family housing.
- The proposed restriction on mono-use student housing blocks was also welcomed by the majority of respondents.

Sustainable Transportation:

- 79% of respondents strongly agreed or agreed with the proposed sustainable transportation core objective, sub-objectives and associated policies.
- There was strong support from local residents for a shift towards greener transport and improvements in public transport access within the Neighbourhood Area.

Green Infrastructure:

- 78% of respondents strongly agreed or agreed with the proposed green infrastructure core objective, sub-objectives and associated policies.
- Local residents were particularly keen on improving existing green spaces, including access and safety along the Regents Canal towpath.
- Respondents also felt that securing ongoing management and maintenance plans are essential.

Design Quality Policies:

- 79% of respondents strongly agreed or agreed with the proposed design quality core objective, sub-objectives and associated policies.
- Preserving and enhancing the existing character of the Neighbourhood Area, including heritage assets was widely supported. However, there were some concerns raised regarding the density of surrounding schemes in the Neighbourhood Area.

Summary of key issues

3.5 The responses received from the Regulation 14 Consultation have helped to shape and refine the proposed policies (and supporting text) within the NDP. Key issues for residents resulting from the Regulation 14 Consultation reflected the evidence based consultation in 2015. They include:

- Reinforcing and enhancing the area's role as a place of employment, retaining the current range of businesses, and providing opportunities for other businesses to flourish
- Providing and enhancing spaces which will build community spirit further, which are accessible to all residents
- Providing a range of housing types and sizes that are genuinely affordable and suitable for local people
- Improving the quality and range of green spaces across the neighbourhood and ensuring maintenance plans are part of these changes
- Improving the quality of the local environment in terms of design, landscape improvements and pedestrian and cyclist comfort and accessibility

3.6 The two key comments that came out of the statutory consultation were:

- The proportion of affordable housing expected and the need to address viability through the planning process; and
- The principle of retaining and re-providing employment floorspace for existing businesses within Camley Street.



Figure 4: Image from Initial Harvest Festival Event Autumn 2018

**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






Figure 5: Image of leaflet distributed for Reg 14 Consultation

Camley Street Neighbourhood Plan proposals

Specifically, the emerging spatial strategy for the NP area envisages that any development advanced within the identified mixed use area will:

- Secure the retention, replacement and refurbishment of existing light-industrial floorspace within the Cedar Way Industrial Estate and in so doing deliver new, innovative, mixed-use building typologies that allow existing and new employment uses to co-exist (e.g. within the same building, space or plot), whilst enabling the successful intensification of a particular site.
- Provide new light-industrial and other flexible uses that are suitable for a wide range of small and large companies, including affordable workspaces for a range of small businesses and start up companies;
- Provide new, high-quality dwellings offering genuinely affordable homes as part of new, well designed, mixed-use building typologies;
- Secure the delivery of a variety of shared and improved communal spaces including parks and gardens, libraries, bike parks, cafés and restaurants, and other community spaces that will encourage interaction, engender and sustain a sense of community;
- Integrate environmental systems that will allow for the capture and reuse of heat generated by the cluster of existing and new food production companies;
- Adopt and integrate measures ensuring that the development is at the forefront of sustainable design and minimises resource consumption through its operation.



Figure 6: Image of entrance to the Cedar Way Industrial Estate



Figure 7: Image of Camley Street Natural Park gates (photo courtesy of London Wildlife Trust)

4 The Vision for Camley Street

- 4.1 The community's vision for the NP area is to be achieved principally through the redevelopment of the Cedar Way Industrial Estate and a number of adjoining parcels of land.
- 4.2 Taken as a whole, the intention of the community (formed of residents, business owners and their employees) is that the NP area should mature into a blend of mixed land uses, partially eroding the segregation that currently exists between the Elm Village residential area and the industrial estate, delivering exemplary workspaces for existing and new businesses and offering a step change in the quality of life of residents by improving mobility, widening the range of goods and services available nearby, integrating nature more widely into the built environment and providing housing suitable in type and attainable in cost.
- 4.3 This vision underpins the policies within the CSNDP through six overarching or 'core' objectives, which appear below. These are broken down further into a number of sub-objectives, and together they provide a framework for policy.

'Adjoining the Regent's Canal and located between Camden Town and King's Cross, the Neighbourhood Plan area will be transformed into a mixed community providing a range of industrial and commercial spaces, new dwellings, and new social and community infrastructure. New development over the Plan period will cumulatively help to deliver a number of objectives including, but not limited to the following: helping the existing and well established business community to flourish and grow, creating opportunities to deliver additional space, which is capable of meeting the needs of a diverse range of new businesses, delivering new homes, the majority of which will be truly affordable, ensuring the delivery of community facilities and services that will support and meet the needs of the existing and new communities and securing the delivery of eco-friendly building design and technologies, with green infrastructure integrated throughout.'



Figure 8: Abstract illustration of the vision for the Camley Street Neighbourhood Area - creating new a new link underneath the railway bridge to the North of the Area

5 Core Objectives

5.1 The six Core Objectives of the Camley Street Neighbourhood Plan have been designed to help achieve the vision. They have been broken down into 'sub-objectives', which have been used to inform the plan policies, as follows:

Core objective 1:

Employment

Development will ensure that the neighbourhood's existing employment function and a place that supports a diverse and rich mix of light industrial businesses will continue. Opportunities will be created to enable the existing business community to flourish and grow. New space will be provided that will be capable of attracting a wide range of additional light industrial and other commercial occupiers.

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 Neighbourhood Plan area, and such spaces should be considered within the context of any mixed-use redevelopment proposals. In particular employment floorspace for start-ups and SMEs will be encouraged.
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 increase opportunities for social activity and interaction.

Sub-objective

1. All development should protect and enhance existing social infrastructure and facilities. (For examples of social infrastructure please refer to paragraph 6.8.1.)
2. All major development proposals should contribute towards improved facilities for social interaction.

Core objective 3:

Housing

Development will deliver a significant number of new homes to suit a variety of people. Development will be required to deliver mixed building typologies that enable existing and new light industrial and other commercial functions and high quality, affordable and well-designed new homes to co-exist and thrive.

Sub-objectives

1. All new development should provide the maximum viable number of dwellings for rent at affordable levels.
2. All new development should provide a range of housing types including prioritising housing for families (3+ beds), where possible and practical.
3. The Forum will seek to limit the amount of additional purpose-built student blocks in support of the recognised need for the provision of affordable self-contained housing across London and within the Neighbourhood Area.
4. Mixed use proposals should incorporate innovative building designs that support the provision of new forms of mixed residential and light industrial floorspace.

Core objective 4:

Sustainable Transport

Development will support and promote sustainable transportation for all uses throughout the Neighbourhood Area.

Sub-objectives

1. Major new development should promote cycling by providing cycle storage/parking in line with Local Plan requirements.
2. Walking and cycling should be promoted by: reinforcing desire lines through traffic calming measures, improving the legibility of road signage, making routes safer by encouraging street activity such as active ground floor frontages, better street lighting and other public realm improvements.
3. New development should seek to integrate into the wider public transport network and where possible, support new connections and facilities.
4. Proposals for mixed use development, including light industrial uses, should seek to reduce and manage the impact of industrial traffic on the local transport network in order to successfully integrate industrial uses and minimise conflicts with residential uses.
5. Intensified and new light industrial uses 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 Area.

Sub-objectives

1. To protect and enhance all existing amenity and green spaces including the designated green spaces at Camley Street Natural Park and Elm Village Open Space.
2. The current green infrastructure network should be enhanced and provision for new connections encouraged, through informal planting opportunities

such as green verges, trees and parks of varying shapes and sizes.

3. To provide and improve connections to existing green spaces outside the Neighbourhood Area boundary.
4. To promote biodiversity net gains throughout the Neighbourhood Area.

Core objective 6:

Design Quality

Development will be of a high design quality, will be ambitious in terms of its environmental credentials, will seek to maximise the opportunity to improve accessibility and legibility into and through the Neighbourhood Area, will improve the safety and convenience for pedestrians and cyclists and will preserve and enhance the area's existing positive features, including all designated and non-designated heritage assets.”.

Sub-objectives

1. All new development should be of the highest design quality and accessible to all.
2. Proposals within the Neighbourhood Area must look at improving connectivity, creating new accessible links to the canal via east-west routes.
3. Way-finding and accessibility should be improved through design measures such as well-designed signage, street furniture and good lighting.
4. Minimum London and Local Plan sustainable design standards should be achieved and, where possible exceeded in order to mitigate against climate change and future proof the Neighbourhood Area.
5. Proposals should explore new building designs that can contribute towards delivering high-quality, integrated mixed-use developments.
6. Tall building proposals must be sustainable, appropriate and well designed.

6 Policies

- 6.1 Camden Council uses adopted planning policies when making decisions on planning applications. The Localism Act (2011) enables communities to develop their own policies at a more detailed local level. Provided that the policies are well evidenced and conform to Camden, London and national adopted policy, they will become part of the statutory development plan for the Camley Street Neighbourhood area. The policies will be used to guide developers and applicants and will provide clear criteria that should be referred to when determining subsequent planning applications.
- 6.2 The policies within this Plan are fully compliant with UK-government policies within the NPPF, strategic and detailed policies within the adopted and draft London Plan and LB Camden Local Plan, as demonstrated within the Basic Conditions Statement submitted in support of the Plan.
- 6.3 The table below sets out the relevant policies that will help deliver the core objectives.

Employment Core Objective 1: Development will ensure that the neighbourhood's existing employment function and a place that supports a diverse and rich mix of light industrial businesses will continue. Opportunities will be created to enable the existing business community to flourish and grow. New space will be provided that will be capable of attracting a wide range of additional light industrial and other commercial occupiers.	Sub-Objective 1	CS EM2 - Retention of Existing Businesses
	Sub-Objective 2	CS EM1 - Employment Floorspace Provision
	Sub-Objective 3	CS EM1 - Employment Floorspace Provision

Local Community and Social Needs Core Objective 2: Development will increase opportunities for social activity and interaction.	Sub-Objective 1	CS CSN1 - Social Infrastructure Provision
	Sub-Objective 2	CS CSN1 - Social Infrastructure Provision

Housing Core Objective 3: Development will deliver a significant number of new homes to suit a variety of people. Development will be required to deliver mixed building typologies that enable existing and new light industrial and other commercial functions and high quality, affordable and well-designed new homes to co-exist and thrive.	Sub-Objective 1	CS HO1 - Affordable Housing Provision
	Sub-Objective 2	CS HO1 - Affordable Housing Provision
	Sub-Objective 3	CS HO3 - Student Accommodation
	Sub-Objective 4	CS HO2 - Residential Provision in Mixed-Use Development

Sustainable Transport Core Objective 4: Development will support and promote sustainable transportation for all uses throughout the Neighbourhood Area.	Sub-Objective 1	CS TR2 - Encouraging Walking and Cycling
	Sub-Objective 2	CS TR2 - Encouraging Walking and Cycling
	Sub-Objective 3	CS TR2 - Encouraging Walking and Cycling
	Sub-Objective 4	CS TR1 - Managing Industrial Traffic
	Sub-Objective 5	CS TR1 - Managing Industrial Traffic

Green Infrastructure Core Objective 5: Development will increase the range and quality of and accessibility to green spaces in the Neighbourhood Area.	Sub-Objective 1	CS GI1 - Protection and Enhancement of Existing Open Spaces
	Sub-Objective 2	CS GI2 - New Open Space Provision
	Sub-Objective 3	CS GI2- New Open Space Provision
	Sub-Objective 4	CS GI3 - Promoting Biodiversity

Design Quality Core Objective 6: Development will be of a high design quality, will be ambitious in terms of its sustainability and environmental credentials, will seek to maximise the opportunity to improve accessibility and legibility into and through Neighbourhood Area, will improve the safety and convenience for pedestrians and cyclists and will preserve and enhance the area's existing positive features, including all designated and non-designated heritage assets.	Sub-Objective 1	CS DQ1- Responding to Places
	Sub-Objective 2	CS DQ2 - Connectivity, Accessibility and Legibility
	Sub-Objective 3	CS DQ2 - Connectivity, Accessibility and Legibility
	Sub-Objective 4	CS DQ1 - Responding to Places
	Sub-Objective 5	CS DQ1 - Responding to Places
	Sub-Objective 6	CS DQ3 - Proposals for Tall Buildings

Core Objective 1: Employment (EM Policies)

- 6.4 Policy CS EM1
- Employment Floorspace Provision

Policy Objective

- 6.4.1 The CSNDP recognises the specific redevelopment potential of the NP area for a mix of land uses that retains land within current employment light industrial uses whilst providing other uses, e.g. housing. Any redevelopment proposal for a site containing existing employment uses will be required to retain and preferably increase the quantum of business and industrial floor space and ensure that the replacement and any new floor space is capable of meeting the needs of all existing businesses (none of which have bespoke or specialist requirements) and other comparable businesses in terms both of their configuration, where possible, and of the level at which rents are charged.
- 6.4.2 Proposals should also provide new commercial floor space (Class B1) that will deliver a range of employment opportunities including the provision of new flexible floor space suitable for the growth of SMEs and start-up businesses. A proportion of this floor space should be made available at affordable rents.

Conformity with other policies

Local Plan: E1 a, b, d, e, g (i), g (ii) & i (Economic Development) and E2 (Employment Premises and Sites).

London Plan: 4.1 a1 & d (Developing London's Economy) and 4.4 (Managing Industrial Land and Premises).

Draft New London Plan: E3 a (Affordable Workspace), E4 (Land for Industry, Logistics and Services to Support London's Economic Function) and E7 d (Industrial Intensification, Co-location and Substitution).

NPPF: Chapter 2 (Achieving Sustainable Development), Paragraph 8 and Chapter 6 (Building a Strong, Competitive Economy), Paragraphs 80-82.

NB: Draft New London Plan Affordable Workspace Definition: Workspace provided at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.

Policy CS EM1 - Employment Floorspace Provision

Development proposals involving the redevelopment of existing employment sites:

- 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;
- Must ensure that all replacement business and industrial floor space is suitable for meeting the operational needs of existing and other comparable new occupiers;
- Must consider providing additional class B uses for small and medium sized enterprises (SMEs), where feasible, a proportion of which should be suited to meeting the needs of both start-up and move-on space; and
- Must ensure that all new B1(c) (light-industrial) floor space provided is charged at average Greater London rental rates at the time of development.
- All other B1 floorspace provision should provide the maximum viable amount of affordable workspace.

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.



Figure 9: Booker



Figure 10: Daily Fish



Figure 11: Cedar Way Industrial Estate



Figure 12: Entrance to Cedar Way Industrial Estate



Figure 13: A Models



Figure 14: DXC technology

6.5 Employment Floor Space Provision - Supporting Information

- 6.5.1 The NP area accommodates numerous businesses including a laundry, an architectural model-making firm, a clothes designer and various vehicle-repair workshops. Most of the 500 or so jobs are provided by businesses in the food sector: a wholesale butcher, a wholesale fishmonger, a wholesale supplier of muesli and other cereal products, and a branch of Booker. These businesses continue the historic connection of the area to the processing and distribution of food to a growing city. Now, as then, the businesses in Cedar Way service the needs of many clients in the Camden area and further afield, particularly within the Central Activities Zone (CAZ): shops, hotels, restaurants, schools, hospitals. Some of the Cedar Way businesses have been in this location for 25 or more years and boast 80% or more of their clients within the CAZ or Camden.
- 6.5.2 The Camley Street cluster of businesses is unique in allowing a small community of businesses to prosper in Central London close to their clients, allowing a reduction in the 'last mile' supply chain. Camley Street still demonstrates a sustainable model for the area at a local and regional level, one which would certainly be undermined if these businesses were required to relocate and disperse to locations further from their clients. It is doubtful whether they could survive such a move and, if they did, there would be added costs for both the businesses and their clients in time and financial cost, as well as having an environmental impact, primarily in miles travelled.
- 6.5.3 The draft London Plan places a strong emphasis on protecting and increasing employment floor space, especially industrial floor space. It specifically recognises the difficulties faced by smaller businesses occupying sub-prime land around the CAZ (Draft Policy E2 and Para 6.2.2).
- 6.5.4 London's CAZ depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy, for servicing the growing population and for providing local jobs. This must necessarily include space for a diverse range of activities, such as food preparation and distribution, industrial production and building trades, which are evident at Camley Street. Monitoring of trends across London demonstrates that between 2001 and 2015, 1,300 hectares of industrial land were released for other uses (with a trend for such uses to be pushed to outer areas). To respond to this loss, the London Plan identifies Camden as a Borough that should retain its industrial capacity. The absence of available alternatives (notwithstanding suitability) within Camden for relocation of Camley Street businesses is another firm reason for seeking to ensure that existing businesses, with established links in the area and to the CAZ, have the opportunity to be accommodated in any redevelopment. Allowing such an opportunity is the intention of the draft London Plan.
- 6.5.5 There is widespread support in the community for the continuation of Camley Street's role as a place of employment, with 70% of people in favour. More specifically, there is a desire to preserve the current balance of small scale business and industrial activity. The vision is to nurture and develop the mutually supportive group of businesses involved in a diverse range of activities, building on Camden's Policy E1, but introducing Camley Street's own characteristics based on established competitive strengths and a willingness to adapt to London's changing economic landscape.
- 6.5.6 In an age of scarce land supply, employment uses have to demonstrate their value first and foremost in economic terms. While there is pressure for the redevelopment of employment sites within Camden – in particular the Cedar Way Industrial Estate – for other uses such as housing, student accommodation or offices, there is a strong case, supported by evidence, that light- and general-industrial uses (including B8) should be safeguarded in the context of redevelopment to deliver a broader mix of uses, commercial and residential. Consultation with the current businesses shows the locational benefits they can achieve across a range of economic, social and environmental factors in being located close to their markets, and the disadvantages in relocation to other places likely to be both further from their clients and detrimental to business. Strategic guidance in Camden suggests that areas in employment use should be maintained and intensified given the scarcity of available land, though redevelopment can be carried out as part of a mixed-use approach.

- 6.5.7 Camley Street contains a mix of existing commercial and industrial uses that are both well established and support – through their activities and client base – the functioning of London’s Central Activities Zone (CAZ). They also offer local employment opportunities and contribute to the vibrancy of the area generally (though the nature of employment relative to the cost of housing make this challenging). Crucially, the B1C, B2 and B8 uses currently on site perform a strategic function within the wider Camden and London economy, providing food wholesale, logistical and laundry services (amongst others) to the cultural and leisure economy sited in the CAZ. This sector also forms an important part of the economy of Camden. This reinforces the area as a suitable place of industrial activity which should be sustained and protected. The policies set out in the CSNDP therefore build on Camden’s Local Plan Policy E1; moreover, evidence from current businesses supports the designation of the Cedar Way Industrial Estate as a site of local significance based on its function as a key distribution centre serving many other established businesses in the CAZ.
- 6.5.8 The CSNDP also sets out a vision for playing a role in the ‘knowledge quarter’ of King’s Cross by providing flexible employment space suited to start-up enterprises. This is space designed to support collaborative working and social interaction. In addition, the plan envisages providing affordable work spaces for artists and designer-makers (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). This group will enrich the civic culture and will be in harmony with the progressive vision for the neighbourhood. Emerging policy in the new London Plan seeks to use planning obligations to secure affordable work space at rents below market rate in defined circumstances (policy E3); the CSNDP aims to ensure that the regeneration of the NP area falls into these defined circumstances.
- 6.5.9 In addition to the provision of commercial, distribution and light-industrial floor space, one of the most environmentally sustainable and increasingly popular places of work is the home. The plan envisages types of residence that support this activity, as well as specific live/work land uses. This will embed adaptability into any mixed-use development scheme and address civic concerns about petty crime and anti-social activity by providing an active human presence in the neighbourhood by day as well as by night.
- 6.5.10 The Forum sees the NP area’s employment uses as fundamental to its identity; the area’s continuation as a flourishing commercial enclave is a core aspect of the Forum’s vision. When assessing development proposals, consideration must be given to whether it will enrich or erode the NP area, including the Cedar Way Industrial Estate site and associated employment functions.

6.6 Policy CS EM2
- Retention of Existing Businesses

Policy Objective

To recognise the contribution of key businesses, and support their retention (or suitable replacement) in any future development.

Policy CS EM2 - Retention of Existing Businesses

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 average Greater London light-industrial rental levels, while ensuring that business continuity is ensured as far as possible (which will be managed by planning obligations).

Where these businesses wish to remain on site, efforts should be made to retain and integrate them into any redevelopment scheme.

The businesses meeting these criteria at the time of the adoption of this plan are listed in the reasoned justification below.

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.

Conformity with other policies

Local Plan: E1 a, b, d, e, g (i), g (ii) & (iii) (Economic Development) and E2 c & d (Employment Premises and Sites).

London Plan: 4.4 a & b (Managing Industrial Land and Premises).

Draft New London Plan: E2 (Providing Suitable Business Space), E3 a (Affordable Workspace) and E7 (Industrial Intensification, Co-location and Substitution).

NPPF: Chapter 2, (Achieving Sustainable Development) Paragraph 8, Chapter 6 (Building a Strong, Competitive Economy), Paragraphs 80-82 and Chapter 15 (Conserving and Enhancing the Natural Environment), Paragraph 182.



Figure 15: CSSZ Office, and the Cedar Way Estate



Figure 16: IMS of Smithfield



Figure 17: Compost Hub and Alara, 110-112 Camley Street

6.7 Retention of Existing Businesses - Supporting Information

- 6.7.1 Traditional locations for small-scale business and industrial uses required to distribute products and produce locally and to service central London, have been squeezed. This has occurred through a combination of increasing demands for housing land, rising land prices and a shift towards e-commerce. 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.
- 6.7.2 Given the identified scale of unmet need for industrial land across London, it is prudent that existing non-designated industrial sites are retained and intensified. Both existing and emerging London and Camden planning policy offers support to existing businesses whose locations are subject to intensification or redevelopment. The emerging London Plan (at policy E2 part B and E7 part E) also aim to ensure that existing businesses are protected prior to the commencement of new development of Non-Designated Industrial Sites, such as Cedar Way Industrial Estate. This protection comes either through the accommodation of those businesses within development proposals, or by ensuring that suitable sites are available nearby and support arrangements are in place.
- 6.7.3 Policy CS EM2 therefore seeks to maintain and enhance the diversity of industries within the overall CS NP area and sustain the existing light-industrial offer by ensuring that replacement light-industrial floor space is provided (including current B8 operators).
- 6.7.4 In support of Policy CS EM2, the role of existing businesses has been assessed to ascertain their importance and value in terms of local employment generation and as servers of London's Central Activities Zone (CAZ) economy. Many of the businesses rely on their central location to deliver services such as food and hospitality to local businesses and maintain close connections with clients.
- 6.7.5 Losing these centrally located businesses would have detrimental consequences on fine-grain local, regional, national and internal supply chains and would have significant adverse effects on air quality due to longer journey times.
- 6.7.6 The rents that these light-industrial businesses can afford to pay mean that they have been and are priced out of higher-value 'B use' central locations. As they play such an important role within the London economy, these businesses should be protected and maintained. The policy ensures that average Greater London light industrial rent levels are applied to businesses that wish to stay in the area through the process of regeneration, an approach afforded by Policy E3 of the Draft London Plan. The Draft London Plan does not define the rate of affordable rent for businesses, as this will be dependent on viability from site to site. However, the Forum believe that a calculation of average light industrial rents across Greater London provides a comparator for Camley Street businesses, balancing the differences between an outer location that is the likely destination of businesses relocating from Camley Street (given the lack of suitable land in Camden or the immediate locality) and the higher rates one might expect from a central London site. It should be noted that although Camley Street is located within London, it is not a premium site. It is anticipated that average Greater London light industrial rents will be calculated and agreed prior to commencement of development.*
- 6.7.7 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.

Name	Address	Type of business
Alara Wholefoods Ltd.	110-112 Camley Street	Muesli/cereals
Daily Fish Supplies	Unit 10-14 Cedar Way	Fish processing and supply
Sweet FA UK Ltd	Unit 16 Cedar Way	Fashion and textiles
AMODELS	Unit 17 Cedar Way	Model-making
IMS of Smithfield	Unit 27-28 Cedar Way	Meat processing and supply
Richmond Laundries	Unit 9 and 29 Cedar Way	Hire and laundry service
Booker wholesalers	106-110 Camley Street	Wholesalers
Packshot	Unit 3-8 Cedar Way	Photography studio

Table 2: List of protected businesses

- 6.7.8 Where these businesses no longer wish to continue trading within the NP area, there is an expectation that the total net floor space will still be re-provided and allocated to a similar light-industrial (B1(c)) or distribution enterprise (B8) that meets the Forum's objectives of maximising local employment opportunities and serving the local and London market. This is to ensure that the predominant light-industrial land use is retained within the NP area and that the units do not get broken up into smaller units that would disperse the existing industrial cluster (notwithstanding any permitted development rights that exist).
- 6.7.9 It is envisaged that the re-provided class B workspace will be secured and managed through S106 'planning obligations', although other means can be considered where they guarantee the policy objective.

* NB: Current Greater London Average Rental Rates (taken across 22 London Areas) for small, industrial sheds (929-2,787sqm) taken at January 2019, is £156.61 per sqm - source: Colliers International.

Core Objective 2: Local Community and Social Needs (CSN policies)

- 6.8 Policy CS CSN1
- Social Infrastructure Provision

Policy Objective

- 6.8.1 'Social infrastructure' is defined as the provision and management of facilities that support social services. This includes healthcare provision, educational uses, play and recreational facilities, public and civic facilities, and cultural and faith-based facilities, to meet local needs in order to contribute to quality of life. The Forum recognises the importance of ensuring that new development is supported by necessary social infrastructure, in order to enhance both existing and new residents' quality of life and promote social and economic growth. Both the NPPF and London Plan (Policy 3.16) encourage boroughs to assess the quality and capacity of existing social infrastructure in order to meet the needs of local communities.
- 6.8.2 New social infrastructure can be provided through developer contributions (community infrastructure levy) from development taking place in the area, though schemes falling below the thresholds defined in Camden Planning Guidance would not be required to contribute. Contributions can be pooled (e.g. small contributions could be pooled to improve public spaces or play areas). Further guidance is available within the Camden Planning Guidance (CPG).
- 6.8.3 It is also important that new development ensures that design standards are high. Good design can bring benefits to communities, such as good health and well-being (e.g. through treatment of public spaces and open space, creation of routes and pathways). This is dealt within under Core Objective 6

Policy CS CSN1 - Social Infrastructure Provision

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).

Any proposal that will result in the loss of or significant harm to identified existing community assets should be refused.

Conformity with other policies

Local Plan: C1 (Health & Well-being), C2 (Community Facilities), C3 (cultural and Leisure Facilities) and C6 (Access for All).

London Plan: 3.7 (Large Residential Developments), 3.16 (Protection and Enhancement of Social Infrastructure) and 7.1 (Lifetime Neighbourhoods)

Draft New London Plan: S1 (Developing London's Social Infrastructure) and S4 (Play and Informal Recreation).

NPPF: Chapter 2 (Achieving Sustainable Development), Paragraph 8 (b), Chapter 3 (Plan-Making), Paragraph 34 and Chapter 8 (Promoting Healthy and Safe Communities), Paragraphs 91 (a & c) & 92.



Figure 18: Camden Garden Centre



Figure 19: Elm Village allotments

6.9 Social Infrastructure Provision - Supporting Information

- 6.9.1 As part of the community consultation undertaken for the preparation of the CSNDP in 2015, almost half of residents (48%) surveyed reported being dissatisfied with the range of goods and services in the area. This is largely due to the fact that the majority of retail and convenience providers are all located within the main local centre, Camden Town, which means that residents have to travel outside the neighbourhood plan area in order to access commercial services. This suggests that there is a need for improved local retail provision within the neighbourhood plan area.
- 6.9.2 The Camley Street neighbourhood also lacks venues for community events and spaces that promote and facilitate social interaction. The Constitution Pub and Camden Garden Centre (and associated café) currently act as 'social hubs' for the local community and are valued within the neighbourhood as vital community assets. It is also anticipated that the new Camley Street Natural Park Visitor Centre (opening in 2020) will provide further space for social interaction including educational provision.
- 6.9.3 These facilities form part of the social infrastructure of the area. If development occurred that diminished the effectiveness of these services, this could constitute significant harm; likewise if open spaces or play spaces are reduced in size or quality, this may also constitute 'significant harm'. This will be assessed on a case by case basis, using evidence of use and impact.
- 6.9.4 There is an opportunity to introduce and plan positively for the broadening of social and community facilities within new developments, and in so doing to secure the status of a Lifetime Neighbourhood as defined in the adopted London Plan.
- 6.9.5 The policy intention is to turn an area with a narrow range of land uses (employment and residential) into one with a richer mix. This will create improved linkages between different parts of the area, and satisfy residents' need for improved services.
- 6.9.6 The key priorities for social infrastructure funding¹ are:
- Improved connections and pedestrian and cycle access through, into and out of the area (including the Camden High Line), new bus stop provision along St. Pancras Way, and improvements to the Regent's Canal tow-path including planting and street lighting;
 - Provision of new, high-quality open space including a pocket park within the identified mixed-use area;
 - Provision of new retail space, in particular food and drink providers delivering new spaces for social interaction and bridging the gap between Camden Town and the King's Cross masterplan area.
- 6.9.7 The Forum will seek opportunities for temporary events and cultural activities, including celebrations for the bi-centenary of the Regent's Canal, which will involve a programme of events along the Canal within the NP Area.
- 6.9.8 Given the strong employment presence along Camley Street, it is also hoped that educational providers will create links with existing businesses to help create jobs for local young people. Educational and training facility proposals will be supported where they complement the employment offer.
- 6.9.9 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.
- 6.9.10 The Forum acknowledge that funding is dependent on viability and will work with developers and the Council to promote projects and secure funding. All developments within the NP Area should contribute to the collective well-being of the area through high-quality design. It is not envisaged that Policy CS CSN1 will apply to all developments coming forward within the NP Area in terms of physical and/or monetary contributions. In the case of a major development, the specific delivery of social infrastructure, either within the curtilage of the development, or by building new facilities off-site, or by making a contribution to the refurbishment costs of an existing facility generally within 400m of the site, will be supported. The Draft Camden Developer Contributions CPG (November 2018) provides clarification on the size of schemes that will be expected to contribute to local infrastructure.



Figure 20: Rear of The Constitution pub as seen from the tow-path

¹ Identified through Reg. 14 consultation

Core Objective 3: Housing (HO Policies)

6.10 Policy CS HO1 - Affordable Housing Provision

Policy Objective

6.10.1 Whilst Policy CS HO1 applies across the Neighbourhood Area, the Forum believes that the identified mixed-use area on figure 45 provides an excellent opportunity to maximise the delivery of housing that is affordable to people on low to moderate incomes. The Forum considers that the mixed-use area, given the existing land ownership position, provides the opportunity to explore different and more innovative funding models to put the delivery of affordable housing and other social benefits at the heart of any redevelopment scenario, rather than profit maximisation. The Forum has developed and tested a number of alternative development scenarios and produced viability models. These models demonstrate that it would be feasible to deliver affordable housing within the mixed-use area of between 50% and 100% affordable. In addition, there is a view that a substantive amount of the housing should be for families in order to meet assessed local need.

Policy CS HO1 - Affordable Housing Provision

Where appropriate, developments proposing a residential element will be expected to contribute to the borough's affordable housing need by (as defined by LBC Local Plan Policy H4):

- a) Delivering the maximum viable quantum of affordable housing on site:
 - With a minimum of 50% on publicly owned land and 35% on all other land and an aspiration of achieving 100%; ;
 - Viability Assessments submitted in support of schemes will be subject to scrutiny and made publicly available;
 - The desired affordable mix is 60% London Affordable (or similar) rent, 40% London Living Rent (or similar).
- b) Providing a range of different unit sizes and housing types, including three- and four-bedroom homes suitable for families, adaptable units for older people and suitable housing for those with a disability subject to locally assessed need.
- c) Innovative housing design that supports home working will be encouraged.

Conformity with other policies

Local Plan: H1 d (Maximising the Housing Supply), H2 (Maximising the Supply of Self-contained Housing from Mixed-use Schemes) and H4 (Maximising the Supply of Affordable Housing).

London Plan: 3.3 (Increasing Housing Supply), 3.8 (Housing Choice), 3.10 (Definition of Affordable Housing), 3.11 (Affordable Housing Targets) and 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed-use Schemes).

Draft New London Plan: GG4 (Delivering the Homes Londoners Need), H1 (Increasing Housing Supply), H5 (Delivering Affordable Housing), H6 (Threshold Approach to Applications), H7 (Affordable Housing Tenure), H8 (Monitoring of Affordable Housing) H12 (Housing Size Mix), H13 (Build to Rent).

NPPF: Chapter 3 (Plan-Making), Paragraphs 20 a & 30 and Chapter 5 (Delivering a Sufficient Supply of Homes), Paragraphs 61-64.



Figure 21: Entrance to Rossendale Way



Figure 22: Row of terraces along Barker Drive



Figure 23: Terraces along Bergholt Mews



Figure 24: Corner of Barker Drive and Weavers Way



Figure 25: Houses along Rossendale Way



Figure 26: Flats along Weavers Way

6.11 Affordable Housing Provision - Supporting Information

- 6.11.1 Policy CS HO1 expects new development to provide accessible and inclusive housing, with a particular focus on providing larger family units and housing for disabled and older people.
- 6.11.2 The vision for the CSNDP builds on Camden's Local Plan Policy H1, which states that the housing supply in the borough will be maximised 'where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site'.
- 6.11.3 The Forum also appreciates the value of mixed communities, people of different ages, income levels and ethnicities and feels that a properly apportioned ratio of social and intermediate products should be arrived at through a process of negotiation with council officers, taking as a starting point the 60:40 tenure split as set out in Local Plan Policy H4. This includes the notion of providing accommodation for middle-income households who are in danger of being squeezed out of Camden. The NPPF 2018 provides a definition for affordable housing: "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local works)". The CSNDP concurs with the Local Plan that any sort of owner occupation, including shared ownership, is likely to be beyond the means of the vast majority of residents. For this reason, the Forum proposes to retain the highest possible proportion of new housing for London affordable rent and intermediate rent (including London living rent) (by habitable room), with a clearly stated aspiration for 100% affordable units, and a minimum expectation of 50% on publicly owned land and 35% on privately owned land, subject to viability, in line with the threshold approach set out within draft London Plan policy H6.
- 6.11.4 The housing policies set out in this document are in conformity with national, regional and local planning policy. A viability study has been prepared by AECOM in accordance with the Planning Practice Guidance and non-statutory guidance such as 'Viability Testing Local Plans' (Local Housing Delivery Group, 2012). It demonstrates that a mixed-use scheme providing 50% affordable housing is viable where it includes an element of shared ownership products within the mix.
- 6.11.5 The Plan's intention is to encourage housing that is genuinely affordable, and it seeks 60% of all affordable units to be London affordable rent. The remaining 40% should maximise the delivery of intermediate rent. The viability assessment included scenario and sensitivity testing, which explored how a higher proportion of affordable units would be viable, including a reduced level of profit assumed upfront. This potentially allows for an alternative delivery model to accrue long-term value in perpetuity (e.g. such as a community land trust model).
- 6.11.6 The desire for the improved provision of housing for families derives from a wider recognition that the neighbourhood would benefit from a more mixed community, including new residential development, to make the area more 'family-friendly'. Whilst the area is residential in parts, the housing stock is made up of predominantly smaller units (flats and apartments) and therefore not suited to growing households. This was verified by the 2011 census data, which showed that the neighbourhood area had a lower proportion of 'married or same-sex civil partnership couples' than in Camden overall. The data also highlighted a significant problem with overcrowding.
- 6.11.7 For this reason, the CSNDP builds on policy 3.8 in the adopted London Plan, which treats the provision of affordable housing as a strategic priority and supports findings in Camden's Strategic Market Housing Assessment.
- 6.11.8 The Assessment also identifies a mix of dwelling sizes, two- and three-bedroom homes (followed by homes with four bedrooms or more) as being the housing types for which there is the greatest need within the borough and NP Area. As such, there is an expectation with policy CS H01 that any new affordable housing provided within the Neighbourhood Area must provide a mix of units including family sized units. However, in line with the draft London Plan Policy H12, a flexible approach to unit size mix will be shown to intermediate and market housing tenures subject to identified local need.

6.12 Policy CS HO2
- Residential Provision within Mixed-Use Development

6.13 Residential Provision within Mixed-Use Development
- Supporting Information

Policy Objective

6.12.1 The Forum recognise the specific redevelopment potential of the Plan area for a mix of uses will seek to maximise housing supply in all forms of development, including mixed-use development, where housing is compatible with other uses within the site. Residential uses provided as part of mixed-use development should comply with policy CS HO1.

Policy CS HO2 - Residential Provision within Mixed Use Development

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.

Conformity with other policies

Local Plan: H1 (Maximising Housing Supply) and H2 (Maximising the Supply of Self-Contained Housing from Mixed-Use Schemes).

London Plan: 3.3 (Increasing Housing Supply) and 3.9 (Mixed and Balanced Communities).

Draft New London Plan: GG4 (Delivering the Homes Londoners Need), H1 (Increasing Housing Supply), H17 (Purpose-built Student Accommodation), E7 (Industrial Intensification, Co-location and Substitution) and D12 (Agent of Change).

NPPF: Chapter 3 (Plan-Making), Paragraph 20 a, Chapter 5 (Delivering a Sufficient Supply of Homes), Paragraph 59, Chapter 11 (Making Effective Use of Land), Paragraph 118 and Chapter 12 (Achieving Well-Designed Places), Paragraph 129.

6.13.1 The vision for the CSNDP builds on Camden's Local Plan Policy H1, which states that the housing supply in the borough will be maximised 'where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site'.

6.13.2 The Forum views housing as a key land use for the Neighbourhood area. Building on Local Plan Policy H2, our aim is for 50% of all additional floor space of 1,000sqm to be allocated as self-contained housing and integrated with other uses to achieve sustainable, mixed-use development.

6.13.3 The delivery of such a mix of uses will require a significant level of intensification in development of the existing employment sites. In addition, the successful integration of both commercial/industrial uses and new residential will require the exploration of new building typologies and layouts which allow for the uses to co-exist in harmony and for the various operational needs to be accommodated without impacting negatively upon residential uses. Any new housing should be designed to minimise conflicts with existing employment uses in line with the Agent of Change Principle, Draft London Plan Policy D12.

6.13.4 Proposals will be assessed using the criteria set out within Local Plan policy H2. Where, in exceptional circumstances, an off-site contribution is made, it is expected that the site will be within the boundary or close proximity to the Neighbourhood Area, unless it can be robustly justified for locating the site elsewhere within the Borough. In exceptional circumstances, where a financial payment in lieu is accepted, it is expected that this should also be used within the Neighbourhood Area as a first priority.

6.14 Policy CS HO3 - Student Accommodation

Policy Objective

- 6.14.1 Census data for the LSOAs covering the Neighbourhood Plan Area suggest that student households form a large proportion of the residents in the Camley Street area, in common with much of the wider area in southern Camden (around 9% of households¹). This is not surprising given the presence of universities close by, however, it is acknowledged that the northern parts of the NP Area around Barker Drive and Elm Village have significantly fewer students (around 3%). This could be as a result of the self-contained nature of the NP Area means that it may be more sensitive to concentrations of students because they are more focused in the area.
- 6.14.2 The Forum welcomes student accommodation to the area as part of building a blended socio-economic demographic, as students can support local services and provide footfall in streets at different times of the day to the resident population. However, a single-use block (for example, 103 Camley Street) can undermine community vitality where on-site provision may be provided and, during non-term times, buildings can be under-occupied and remove high proportions of people for relatively long periods. This variance in population through the year may undermine the provision of new services (e.g. shops) in some circumstances.
- 6.14.3 Therefore, the Forum will only support the provision of student housing where it is co-located with another use, in order to encourage mixed use development and neighbourhoods.

Policy CS HO3 - Student Accommodation

Student accommodation properly integrated and managed within new mixed-use developments that also includes separate self-contained housing will be supported.

Mixed-use developments that include residential use may include accommodation designed specifically for students subject to the following criteria:

- at least 90% of new residential units brought forward within the NP Area should be provided as permanent self-contained homes (use class C3);
- residential floor space conforms with Policy HO1;
- an element of affordable student accommodation should be provided as part of any proposal for student accommodation, as per the Housing SPG 2016 (subject to viability);
- 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;
- mono-use student blocks will not be supported.

Within the mixed-use area identified within figure 45, 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.

Conformity with other policies

Local Plan: H6 (Housing Choice and Mix) and H9 (Student Housing).

London Plan: 3.8 (Housing Choice) and 3.9 (Mixed and Balanced Communities).

Draft New London Plan: GG4 (Delivering the Homes Londoners Need), Policy H1 (Increasing Housing Supply) and H17 (Purpose-built Student Accommodation).

NPPF: Chapter 5 (Delivering a Sufficient Supply of Homes), Paragraphs 59 & 61.

¹2011 Area Classification for Output Areas: Variable 26 - % households with full-time students

6.15 Student Accommodation - Supporting Information

6.15.1 Both local and regional policy recognise the difficulties created by concentrations of students in a given area, and how this can create communities that are out of balance. The LB Camden Student Housing Background Paper (June 2016) states that Camden accommodates 10 of the 40 higher-education institutions in London, with the majority located within the south of the borough around Euston, Holborn and King's Cross. As a result, the borough is home to the largest student population in London, with 24,305 domestic and foreign students living across Camden and attending publicly funded higher educational institutions (HESA 2012/2013). This equates to 6.6% of London's total student population (369,390) and demonstrates a higher than average concentration of students.

6.15.2 The adopted London Plan (Policy 3.8) sets a strategic requirement for 20,000-31,000 student bed spaces across London over 10 years (to 2025) or 2,000-3,100 bed spaces per year. The target for Camden is 165 non-self-contained dwellings (including student housing) per year between 2011 and 2021 (25% of the overall target for housing delivery).

6.15.3 Camden's Authority Monitoring Report (AMR) 2016-2017 states that from the period 1 April 2012 to 31 March 2017 the Council recorded 2,777 additional non-self-contained housing units in Camden, predominantly for student provision. This equates to an annual average delivery of 555 bed spaces, clearly exceeding the SHLAA target of 165 spaces (by 1,950 spaces over a five-year period).

6.15.4 In addition, there is a recognised concentration of student housing within the central part of the borough (again noted by the Student Housing Background Paper). The London Plan and Local Plan both recognise the importance of creating mixed, inclusive communities and, as part of that, the need to disperse student housing away from areas already over-concentrated (LB Camden Policy H9). Between 2001 and 2011, there was an 194.5% increase in the student population living within the St. Pancras and Somers Town ward, increasing again by 118.2% from 2011 to 2016.

6.15.5 This evidence demonstrates that across the borough and within Somers Town ward there has historically been, and will be, sufficient provision of student bed spaces, vastly exceeding the annual assessed requirement.

6.15.6 There are also concerns that the requirement for further student accommodation has had implications on existing residents within the borough in terms of the need to create mixed and balanced communities, and in terms of reduced or lost capacity for conventional homes, especially affordable family housing. Table 2 within the Student Housing Background Paper demonstrates that the supply of net additional student housing completions greatly exceeded net additional self-contained homes completions from 2010 to 2015.

Year	Additional Student Housing Completions	Net additional self-contained housing completions
2010/11	110	551
2011/12	96	373
2012/13	0	578
2013/14	1,205	506
2014/15	1,054	458

Table 3: Net additional student housing completions within Camden from 2010 to 2015

6.15.7 As such, through Policy CS HO3, the Forum seeks to balance the assessed need for additional student accommodation within the ward, with a priority on providing affordable, self-contained housing. In meeting criterion (a), no single development should provide less than 90% of self-contained residential development to ensure that the proportion is met over the Plan period in the absence of an overall housing target, thereby ensuring that 90% of residential units that come forward across the Neighbourhood Plan Area will be self-contained housing. However, feasibility studies have demonstrated that the mixed use area identified in Figure 45 could support between 600-800 homes. 90% would equate to between 540-720 units, which will be expected to come forward as self-contained housing, leaving around 60-80 units for student housing provision.

6.15.8 Within any redevelopment of the identified mixed-use area, the presence of non-residential uses and class B floor space may support students or graduates who wish to make use of affordable work spaces to pursue business ambitions. Therefore, student accommodation within proposals on Cedar Way should explore possible linkages between university accommodation and work space (e.g. through business placements or practical connections through specific university courses and businesses present in Cedar Way).

6.15.9 Within the borough it has been demonstrated that commercial uses are compatible with student housing proposals. The Travis Perkins development along St. Pancras Way is one such scheme, located within close proximity to the NP Area boundary. Completed in 2014, it comprises a 3,877sqm builders' merchant, which 'sits' beneath the Unite student accommodation (563 student bed spaces).

NB: Affordable student accommodation is not eligible for social housing relief from Community Infrastructure Levy (CIL) charges as per the Mayor of London Housing SPG (Paragraph 3.9.17).



Figure 27: Camley Street bridge



Figure 28: View along the tow-path to The Constitution



Figure 29: Tow-path access to Camley Street



Figure 30: Entrance to Agar Grove



Figure 31: Barker Drive



Figure 32: Access to the tow-path from the Co-op

Core Objective 4: Sustainable Transport (TR Policies)

6.16 Policy CS TR1 - Managing Industrial Traffic

Policy Objective

6.16.1 One of the key CSNDP objectives is to protect and enhance existing industrial uses, including intensification through mixed-use development. However, this brings challenges surrounding increases in transport, in particular involving heavy goods vehicles. New developments will be required to plan comprehensively to enable the operational needs of existing and new businesses to be met whilst at the same time encouraging more sustainable transport modes and managed delivery strategies. At the same time, provision should seek to maximise opportunities for residents and workers to walk and cycle.

Policy CS TR1 - Managing Industrial Traffic

Mixed-Use 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:

- a) Providing space for off-street loading bays to avoid disruption to traffic;
- b) Submitting delivery management plans for all employment- generating developments demonstrating how deliveries and servicing will avoid major disruption to neighbouring residents;
- c) Reducing freight movements overall through freight consolidation and co-ordinating delivery strategies;
- d) Utilising 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;
- e) Segregating industrial traffic from pedestrian and cycle routes, where practicable, in order to minimise conflicts and air and noise pollution;
- f) Identifying opportunities to utilise the Regent's Canal for the movement of freight; and
- g) Reducing carbon emissions through last-mile schemes, including by bicycle and/or electric vehicle.

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.

Conformity with other policies

Local Plan: T1 (Prioritising Walking, Cycling and Public Transport), T4 (Sustainable Movement of Goods and Materials), T3 (Transport Infrastructure) and T2 (Parking and Car-free Development).

London Plan: 6.3 (Assessing the Effects of Development on Transport Capacity) and 6.1 (Strategic Approach to Integrating Transport and Development).

Draft New London Plan: SI1 (Improving Air Quality), T1 (Strategic Approach to Transport), T3 (Transport Capacity, Connectivity and Safeguarding) T4 (Assessing and Mitigating Transport Impacts), T7 (Deliveries, Servicing and Construction) and SI15 (Water Transport).

NPPF: Chapter 9 (Promoting Sustainable Transport), Paragraph 102 a, b, d & e, 104 a, b & c, 107, 108, 110 & 111.

6.17 Managing Industrial Traffic - Supporting Information

- 6.17.1 Policy CS TR1 seeks to support the intensification of the Cedar Way Industrial Estate, and associated land parcels, through facilitating sustainable delivery and freight movement. Whilst consultation with residents has shown that the majority of respondents strongly support the retention and intensification of employment uses, there are concerns from local residents in relation to increased traffic movement along Camley Street. The Plan provides comfort that this process of intensification and development is properly managed in respect of disruption and intrusion from vehicles, and aims to reduce this where possible.
- 6.17.2 All new development proposals within the NP Area that will generate significant amounts of movement, including an increase in delivery vehicles, should also be accompanied by a robust Travel Management Plan and Servicing and Delivery Plan, as required by the NPPF and London Plan. Delivery plans should demonstrate that all reasonable endeavours have been made towards using rail, water and other alternative modes of transport in order to relieve congestion and reduce carbon emissions along Camley Street. Transport for London provides a number of tool kits and strategies for freight consolidation at both the personal and the organisational level that can provide guidance on dealing with deliveries and supply chains more efficiently. These have proven impacts in reducing the negative side effects of vehicular movements¹.
- 6.17.3 LB Camden's Local Plan Policy T4 and supporting text confirm that the use of the Regent's Canal is thought to be 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.

¹ <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-efficiently/deliveries-toolkits>

Existing Transport Connections

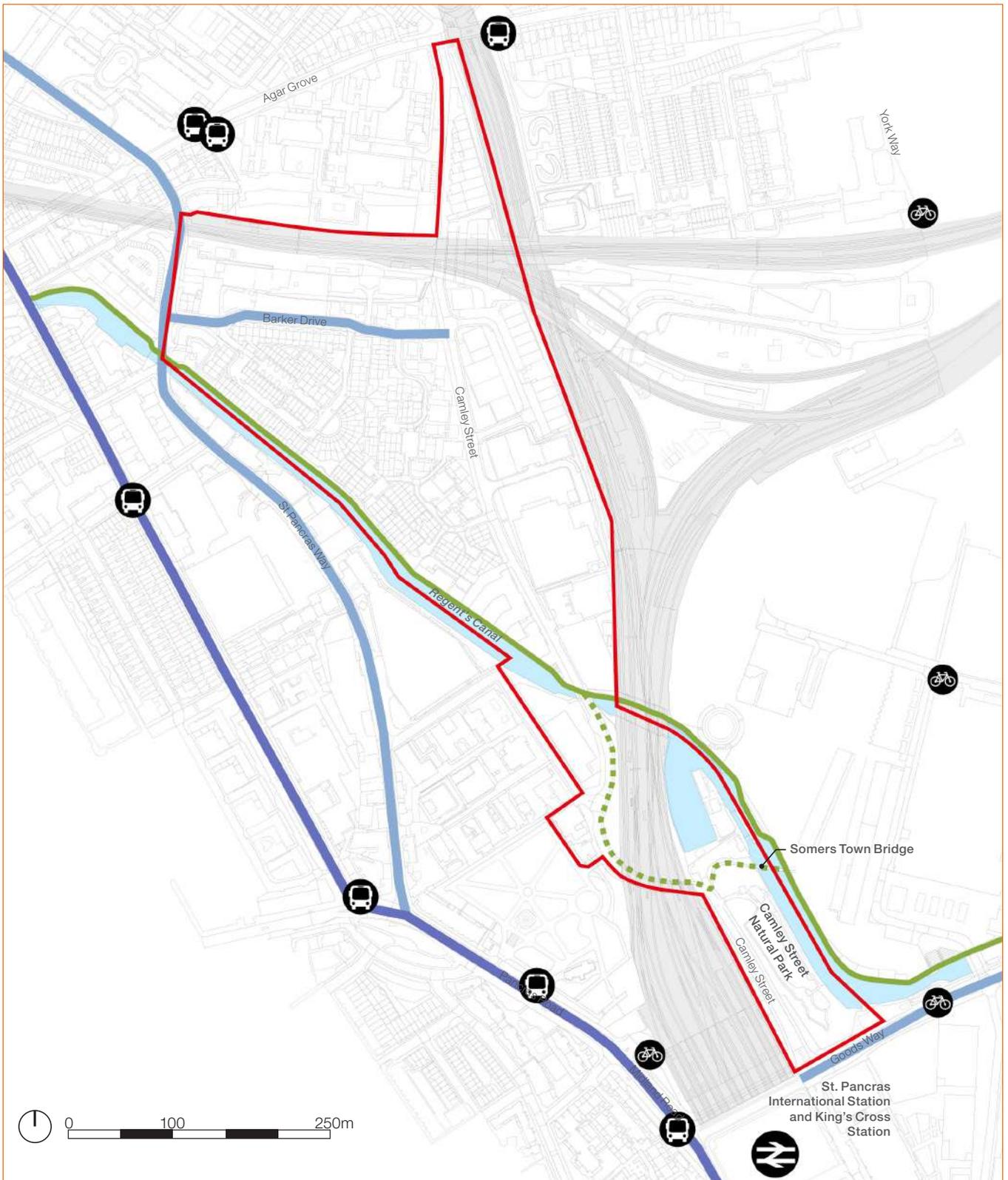


Figure 33: Demonstrating existing transport access

Key

- | | | | | | |
|--|-----------------------------------|--|-------------------|--|------------------------------------|
| | St. Pancras International Station | | Proposed quietway | | Jubilee Greenway |
| | Bus stop | | Quietways | | Jubilee Greenway alternative route |
| | Bike hire station | | | | |

6.18 Policy CS TR2
- Encouraging Walking and Cycling

Policy Objective

- 6.18.1 Currently, the walking and cycling network within the NP area is formed largely of footways and open spaces owned and maintained by the Council. The area also contains a section of the Jubilee Greenway, a London-wide strategic walking route, along the Regent’s Canal tow-path. However, severance and gaps within the network, exacerbated by inadequate street lighting and little to no signage, are preventing people from choosing to use alternative sustainable transport modes such as walking and cycling. Hence, the Forum wishes to promote walking and cycling within the NP area as a viable, safe and sustainable alternative to the private car, by providing guidance and requirements to improve the walking and cycling network.
- 6.18.2 Future proposals are expected to be car free, apart from required Blue Badge Parking Spaces, in line with London Plan and Local Plan policies.

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.

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.

Policy CS TR2 - Encouraging Walking and Cycling

Development proposals within the NP area should maximise the quality of walking and cycling conditions by respecting the principles below:

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.

Creating an inclusive Network: Proposals should be designed to improve physical accessibility throughout the Neighbourhood Plan 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.

Improving and Upgrading the Network: Existing footway space should be maintained and, where possible, increased as a result of development. Opportunities to enhance the Regents Canal corridor should be explored 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.

Conformity with other policies

- Local Plan:** T1 (Prioritising Walking, Cycling and Public Transport), T3 (Transport Infrastructure) and T2 (Parking and Car-free Development).
- London Plan:** 6.1 (Strategic Approach to Integrating Transport and Development).
- Draft New London Plan:** T1 (Strategic Approach to Transport), T2 (Healthy Streets), T4 (Assessing and Mitigating Transport Impacts), T5 (Cycling) and Policy D7 (Public Realm).
- NPPF:** Chapter 8 (Promoting Healthy and Safe Communities), Paragraph 91 c, Chapter 9 (Promoting Sustainable Transport), Paragraphs 102 c & e, 104 d & 110 a & c and Chapter 11 (Making Effective Use of Land), Paragraph 122 c.

6.19 Encouraging Walking and Cycling - Supporting Information

- 6.19.1 The Forum expects new proposals within the NP Area to give the highest priority to pedestrian and cyclist connectivity. Any new vehicular proposals should be appropriate in scale, maintain existing footway space and provide opportunities to enhance the pedestrian environment and minimise conflict between vehicle users and pedestrians and cyclists.
- 6.19.2 It has long been acknowledged that providing convenient, safe and well-designed walking environments between homes, shops, services, jobs and public transport hubs is key in encouraging people to increase the number of trips they make on foot. The railway line to the east of the NP Area and the canal to the west create physical barriers to pedestrian movement, reducing opportunities for pedestrian journeys. As such, it is recommended that opportunities to 'mend' current severances within the network should be taken, including facilitating improvements to pedestrian and cyclist connectivity into and out of the NP Area. Consultation with residents and employees has revealed a strong desire to see the London bike hire system extended into the Camley Street area; the neighbourhood currently has no bike hire stations and it is felt that providing bikes close to the Cedar Way Estate could have an impact on journey choices, particularly for those employed there. The Forum will approach Transport for London with a view to rectifying this.
- 6.19.3 As part of the CSNDP evidence base, residents surveyed reported an inadequate amount of street lighting, leading to perceptions of increased anti-social behaviour, which has a direct impact on perceptions of pedestrian safety, particularly under the bridge near to the garages to the north of the area (Figure 27) and around Elm Village open space (Figure 37). London Plan Policy 6.1 addresses the quality and safety of London's pedestrian environment and expects development proposals to provide high-quality spaces for pedestrians with regard to Transport for London's Pedestrian Design Guidance.
- 6.19.4 Further, a lack of information on how destinations can be accessed on foot or by bike can prevent people from choosing alternative sustainable transport modes. A survey undertaken by Research Business

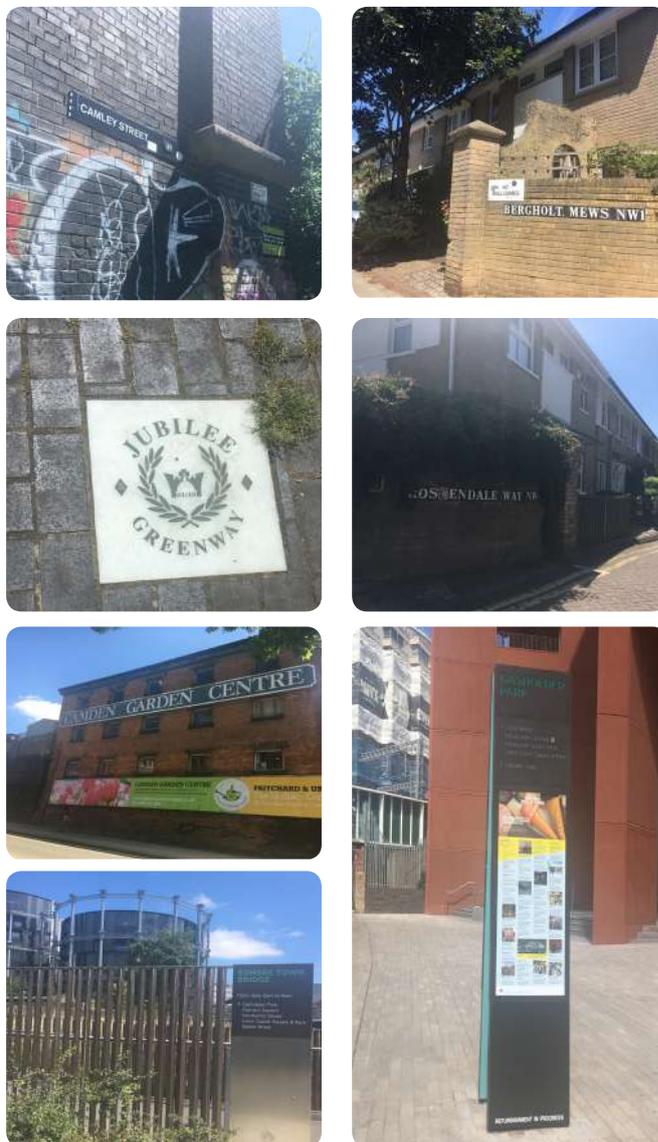


Figure 34: Pedestrian and cycleway routes should make use of existing routes where possible and incorporate improved and constant wayfinding and signage. Currently the area has an inconsistent approach to signage.

International in 2002 found that 66% of travellers would consider walking instead of using public transport, after being shown a walking map. Amongst tourists, this figure increases to 80%. The Forum will look to promote and install a comprehensive and coherent pedestrian wayfinding system throughout the NP Area, connecting it to the surrounding areas. Legible London is a wayfinding project, managed by Transport for London, designed to provide concise information about an area, throughout the Capital, for people who choose to walk. The Forum will look to engage with Transport for London to replace the current wayfinding system in Camley Street with the Legible London system, further enhancing the 1,700-sign network in inner London.

- 6.19.5 The Mayor of London Accessible London: Achieving an Inclusive Environment SPG (2014) expects Neighbourhood Plans to promote inclusive design and lifetime neighbourhoods and to engage with the local community to ensure that the Neighbourhood Plan Area is accessible and welcoming to everyone. Policy CS TR2 promotes inclusive planning and expects developers, architects, planners and urban designers to create neighbourhoods that are truly accessible to everyone.

Core Objective 5: Green Infrastructure (GI Policies)

6.20 Policy CS GI1

- Protection and Enhancement of Existing Open Spaces

Policy Objective

6.20.1 The Forum is concerned that there is an emerging deficiency of green or open space in the area, particularly in light of proposed new development. This condition is exacerbated by the relatively poor state of maintenance of existing sites.

Policy CS GI1 - Protection and Enhancement of Existing Open Spaces

Existing open spaces will be protected and enhanced. This will be achieved by:

- Securing financial contributions from new development which will be targeted towards the greening of the area;
- 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;
- 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;
- Requiring improvements to green corridors, and links to existing open spaces of value outside the NP area;
- Protecting existing residential gardens and resisting self-contained residential development that would lead to a loss of such spaces;
- Refusing development that would have a direct or indirect harmful impact on, but not limited to, the Regent's Canal, Camley Street Natural Park and Elm Village Open Space.

Conformity with other policies

Local Plan: A2 k, n, o, p & q (Open Space), A3 e & f (Biodiversity) and CC2 a & b (Adapting to climate change).

London Plan: 7.1 b & c (Lifetime Neighbourhoods) and 5.10 a & c (Urban Greening).

Draft New London Plan: G1 (Green Infrastructure), G4 (Open Space), G5 (Urban Greening), G7 (Trees and Woodlands), SI14 (Waterways - Strategic Role) and SI17 (Protecting and Enhancing London's Waterways).

NPPF: Chapter 8 (Conserving and Enhancing the Natural Environment), Paragraph 91 c, 92 a, 96, 97, 99 & 101.



Figure 35: Camley Street Natural Park



Figure 36: Elm Village open space play area



Figure 37: Elm Village Open Space

6.21 Protection and Enhancement of Existing Open Spaces
- Supporting Information

Name	Designations	Size of Park	Distance from middle of NP Area (103 Camley Street) in m. approx.
St. Pancras Gardens	Local Park & Grade II Listed	2.2ha	220m
Goldington Crescent Gardens	Small local park/open space	0.3ha	332m
Lewis Cubitt Park	Small local park/open space	0.65ha	369m
Bingfield Park	Small local park/open space	-	660m
St. Martins Gardens	Small local park/open space	0.7ha	616m
Harrington Square	Small local park/open space	0.5ha	798m
Gas Holder Park	Small local park/open space	-	188m
Polygon Road Open Space	Small local park/open space	0.5ha	623m
Brill Place	Small local park/open space	-	590m
Edward Square	Small open space	-	880m
Regent's Park	Metropolitan Park & Grade I Listed	28.9ha	1.34km
Primrose Hill	District Park & Grade II Listed	25.3ha	1.69km
Castlehaven Open Space	Community Park	-	1.12km

Table 4: Open Spaces closest to Camley Street

- 6.21.1 Policy CS GI1 expects development proposals to protect and contribute to existing open spaces, ensuring a high level of environmental and social value.
- 6.21.2 An open space assessment for the NP Area was undertaken in 2015, with further desk-based analysis undertaken in early 2019, as part of the evidence base for the CSNDP. The analysis confirmed that the majority of residents have good access to a wide range of publicly accessible green and open spaces within 800m of the NP Area, including Camley Street Natural Park. This is in line with the 'walkable neighbourhood' approach set out in Manual for Streets (2007), which recommends a maximum walking distance of around ten minutes or 800m (though it also states that 'walking offers the greatest potential to replace short car trips, particularly those under 2km'). Regents Park, a designated Metropolitan Park, is located 1.3km away and Primrose Hill, a District Park, is 1.7km away.
- 6.21.3 Within the NP Area boundary there is only one small local park designed for the neighbourhood, Elm Village Open Space (figures 36 & 37). Whilst there are also a number of incidental green spaces, such as road verges, the majority of these spaces are currently poorly maintained and subsequently do not constitute usable green space.
- 6.21.4 'Place check criteria' were applied to the open spaces within the NP Area to assess their community value. There were nine criteria to be met, each ranked out of ten, giving a possible total score of 90. Only two spaces scored more than 60 out of 90, Camley Street Natural Park (Figure 35) and Elm Village Open Space, demonstrating a need to improve the existing open spaces within the NP Area. Increases in population would exacerbate the current situation.
- 6.21.5 Part (b) of CS GI1 seeks to mitigate concerns regarding the deterioration of these smaller green spaces and encourages their enhancement. Some of these amenity areas lie within the area identified for 'mixed-use development'. New development which would result in the loss of these green spaces will be expected to re-provide the net area of the space within the NP Area boundary and preferably within close proximity to the original site.

6.21.6 One of the key objectives in Camden’s ‘Green Action for Change’ (2018-2020) is to promote tree planting across the Borough with an aim to plant 400 new street trees annually. Part (c) contributes to this aim and, in line with Local Plan Policy A3, all trees within the NP Area with biodiversity and amenity value will be protected, not just those categorised as ‘A’ and ‘B’ under BS 5837:2012. All trees located within the Regent’s Canal Conservation and those protected by Tree Preservation Orders will be safeguarded in line with higher policy. Where the loss of a tree is unavoidable, the Forum will seek like-for-like replacement planting.

6.21.7 Part (d) looks to promote and enhance green corridors and links within, into and out of the NP Area, in line with Local Plan Policy A2. One such corridor is the Camden High Line, suggested by blogger Oliver O’Brien in 2015 and being actively pursued by the Camden Town Unlimited BID. The aim is to create a linear, green and open walkway between King’s Cross and Camden Town. The route would utilise a disused railway line that runs alongside the existing Overground route. O’Brien identified a route that terminated at its eastern end at Camley Street, using the existing stairs towards the northern end of Camley Street on the north side of the railway.

6.21.8 Part (e) of CS GI1 protects residential gardens, which contribute to the green spaces of the NP Area and provide vital private amenity space for residents within an inner-city borough. LB Camden’s Draft Trees CPG (November 2018) states that, “front, side and rear gardens make an important contribution to the townscape of the Borough and contribute to the distinctive character and appearance of the buildings” (para. 2.17). A High Court judgement in 2016 determined that the exemption to previously developed land within the NPPF only applies to residential gardens within ‘built up areas’. Gardens are classed as greenfield land, so part (e) seeks to protect them from self-contained residential development, though Permitted Development rights apply (so small scale household development is permissible under the General Permitted Development Order (2015)).

6.21.9 Camley Street Natural Park has the status within the Local Plan of a Designated Local Nature Reserve, Elm Village Open Space is identified as a Local Green Space and the Regent’s Canal is a Green Chain and Corridor. LB Camden Local Plan Policies A2 and A3 protect and safeguard such sites. Part (f) expects continued efforts to manage and maintain such open spaces and protect them from any inappropriate or harmful development.



Figure 38: Camley Street compost hub



Figure 39: Green space next to Cedar Way industrial estate

6.22 CS GI2
- New Open Space Provision

Policy Objective

6.22.1 To maintain and increase social interaction and the quality of life for existing and future residents, the Forum will expect all new development to provide open space and contribute to urban greening. There should also be adequate play space provision within new mixed and residential developments.

Policy CS GI2 - New Open Space Provision

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:

- a) Providing appropriate new green and open spaces within all new development including private and public amenity spaces.
- 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;
- 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;
- 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.

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.)

6.23 New Open Space Provision
- Supporting Information

6.23.1 The London Plan, Mayor of London's Housing SPG and Local Plan expect new residential developments to provide both communal and private amenity space, including adequate play space provision.

6.23.2 Policy CS GI2 also supports LB Camden's Open Space studies recommendation for the provision of an additional pocket park (a type of open space designed to measure around 0.4ha) in the St. Pancras and Somers Town ward, to address the deficiencies in park provision within the area. There are several underused car parks within the plan area that could be utilised as public open spaces.

6.23.3 The provision of open space within the defined mixed-use area will be sought as a priority. In line with Camden's Public Open Space CPG, an off-site contribution will be accepted where it is demonstrated that it is located within the NP Area boundary. Open space provision will be secured through S106 Agreements for major developments.

6.23.4 Community infrastructure levy (CIL) contributions can be used to support small-scale open spaces and parks. The Forum will work with the CIL team within Camden Council to secure contributions for the local area for new green space provision.

Conformity with other policies

Local Plan: A2 (Open Space) and A3 (Biodiversity).

London Plan: 5.10 (Urban Greening), 7.19 (Biodiversity and Access to Nature) and 3.6 (Children and Young People's Play and Informal Recreation Facilities).

Draft New London Plan: G1 (Green Infrastructure), G4 (Open Space), G5 (Urban Greening), G6 (Biodiversity and Access to Nature), S4 (Play and Informal Recreation), SI16 (Waterways - Use and Enjoyment), SI17 (Protecting and Enhancing London's Waterways) and D7 (Public Realm).

NPPF: Chapter 2 (Achieving Sustainable Development), Paragraph 8 b; Chapter 8, Paragraph 91, 92 a & 96.

Existing Green and Open Spaces within the Neighbourhood Area

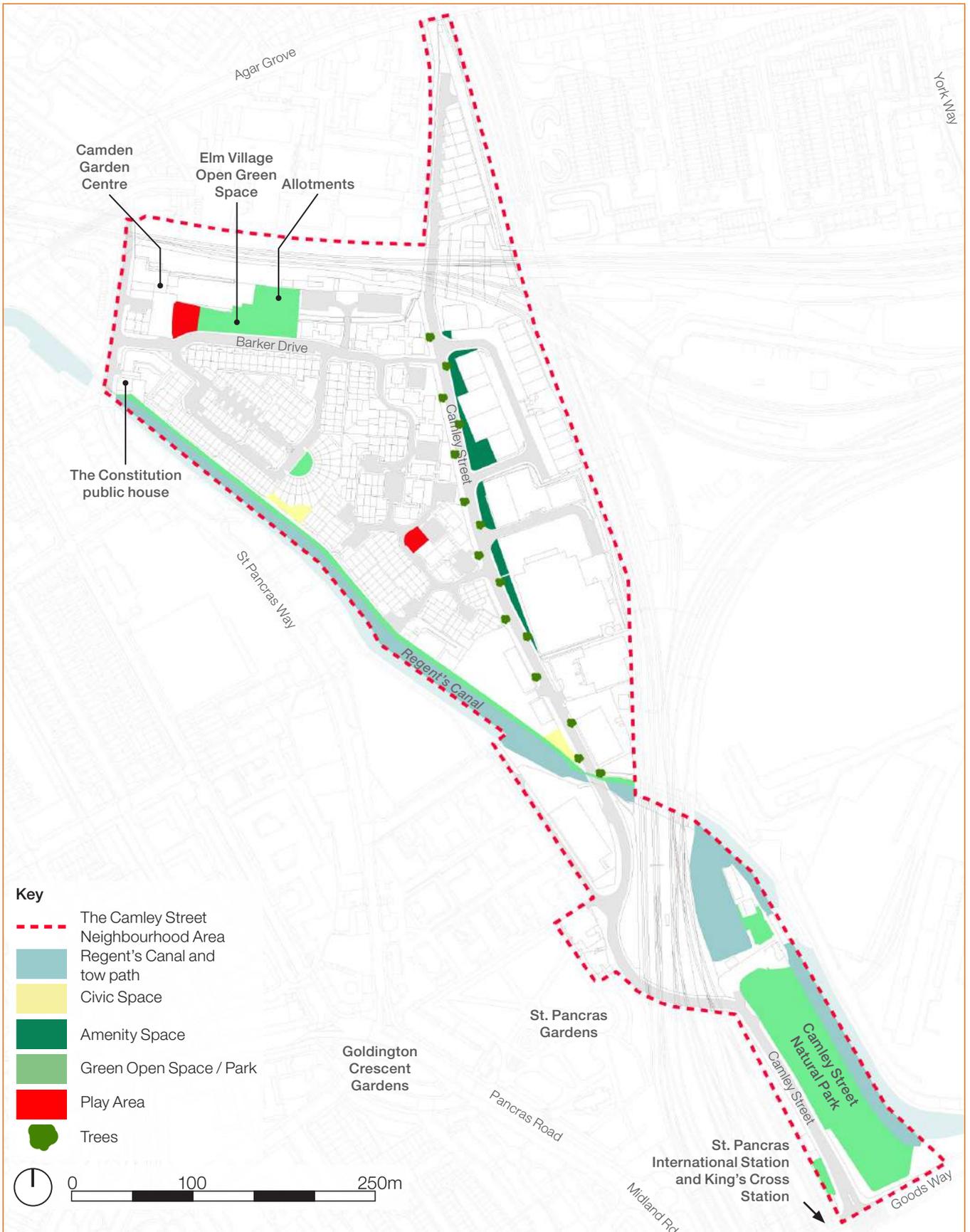


Figure 40: Map highlighting existing green spaces within the Neighbourhood

6.24 CS GI3
- Promoting Biodiversity

Policy Objective

6.24.1 There are demonstrable benefits to having access to high-quality green open spaces including social value and improvements to quality of life. LB Camden Biodiversity Action Plan 2013-2018 recognises the benefits to biodiversity, and that access to open space(s) contributes to health and well-being. The provision of high-quality green space with biodiversity value can also enhance community cohesion and reduce crime, in addition to mitigating against climate change and improving air quality. As such, one of the Forum's key aims is to integrate nature more widely throughout the Built Environment. Policy CS GI3 promotes biodiversity enhancements throughout the NP area.

Policy CS GI3 - Promoting Biodiversity

The Forum wishes to secure biodiversity net gains as a key objective within all new development proposals. This will be achieved through:

- a) The use of Sustainable Urban Drainage systems (SUDs) including: green roofs and swales in all developments in order to enhance biodiversity, in particular along Camley Street, Barker Drive, Rossendale Way, Weavers Way and south of Cedar Way;
- b) Reinvigorating the 'blue network' by maximising the opportunities for the regeneration of existing waterways within the NP area for nature and wildlife;
- c) The incorporation of sustainable food-growing opportunities where possible, including providing support to existing community food-growing initiatives;
- 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;
- e) Maximising opportunities for new tree planting particularly along Camley Street;
- f) The provision of sustainable living walls at key points to act as biodiverse landmark features.

Conformity with other policies

Local Plan: A2 (Open Space) and A3 (Biodiversity).

London Plan: 5.10 (Urban Greening) and 7.19 (Biodiversity and Access to Nature).

Draft New London Plan: G1 (Green Infrastructure), G4 (Open Space), G5 (Urban Greening), G6 (Biodiversity and Access to Nature), G7 (Trees and Woodlands), Policy G8 (Food Growing), SI12 (Flood Risk Management), SI13 (Sustainable Drainage), SI14 (Waterways - Strategic Role), SI16 (Waterways - Use and Enjoyment), SI17 (Protecting and Enhancing London's Waterways and D7 (Public Realm).

NPPF: Chapter 2 (Achieving Sustainable Development), Paragraph 8 c, Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), Paragraphs 150 a, 157 c & 165 and Chapter 15 (Conserving and Enhancing the Natural Environment), Paragraphs 170 a, d & e, 174, 175 a, c & d & 180.

6.25 Promoting Biodiversity - Supporting Information

- 6.25.1 The Forum recognises that biodiversity plays a key role in fulfilling the vision of a sustainable and thriving neighbourhood, promoting health, well-being and economic prosperity. Increasing the resilience of biodiversity throughout the NP Area, in particular in response to climate change, through enhancements to existing ecological networks, is therefore one of the Forum's top priorities.
- 6.25.2 The recent DEFRA consultation on biodiversity net gains in new development, and the draft new London Plan policy G6 Biodiversity and Access to Nature, highlight a policy shift towards promoting biodiversity net gains at a strategic level. At the local level, Policy CS GI3 looks to make the built environment more attractive for wildlife, reduce flood and heat risks and increase opportunities for sustainable food growing. This also has financial benefits to the local economy due to improved mental health of employees, which in turn promotes productivity in the workplace.
- 6.25.3 Draft London Plan Policy SI14 acknowledges the contribution London's waterways make in terms of ecological habitat value.
- 6.25.4 The whole of the NP Area is within the designated Air Quality Management Area. National air quality objectives for NO₂ were exceeded monthly at all 4 automatic monitoring stations in 2015-17. Policy CS GI3 looks to address issues surrounding air quality within the NP Area, particularly in relation to any adverse effects caused by industrial uses, including freight and goods vehicles, through the use of appropriate urban greening and biodiverse enhancements. Improvements to biodiversity will also reduce car dependency as people will be more inclined to walk or cycle if given access to safe and attractive routes away from noise and traffic pollution.
- 6.25.5 Further, it is also acknowledged that sections of the road network are at risk of surface water drainage and sewer flooding. As such, Policy CS GI3 expects all new development proposals to include innovative SUDs measures, enabling local irrigation potential, in order to promote a water-sensitive Neighbourhood Area. Rainwater harvesting will also be encouraged in order to minimise overall water demand.

- 6.25.6 The Forum also wish to promote opportunities for local people to become involved within nature conservation work and biodiversity related activities given the physical and mental health benefits attributed to access to nature and biodiversity.



Figure 41: Aerial View of Camley Street Natural Park (photo courtesy of London Wildlife Trust)



Figure 42: Educational session at Camley Street Natural Park (photo courtesy of London Wildlife Trust)

Core Objective 6: Design Quality (DQ Policies)

6.26 Policy CS DQ1
- Responding to Places

Policy Objective

6.26.1 Development should look to respond to the existing natural, built and historic environment and create new, high-quality mixed neighbourhoods.

Policy CS DQ1 - Responding to Places

All development proposals should respond appropriately to the existing Neighbourhood Plan Area in accordance with the design principles outlined below:

Existing Industrial Mix: Securing 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 can contribute towards delivering high-quality mixed-use developments.

Existing Residential: Ensuring 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.

Connectivity: Ensuring 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.

Urban Fabric: 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.

Architectural and Historic Context: Preserve and enhance the settings of existing heritage assets. Protect and enhance existing views identified within Figures 43 and 44.

Landscape and Ecology: 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.

Sustainable Design: 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.

Conformity with other policies

Local Plan: D1 (Design) and D2 (Heritage).

London Plan: D7 (Local Character), 7.6 (Architecture) and 7.8 (Heritage Assets and Archaeology).

Draft New London Plan: D1 (London's Form, Character and Capacity for Growth), D1A (Infrastructure Requirements for Sustainable Densities), D1B (Optimising Site Capacity Through The Design-led Approach), D2 (Delivering Good Design), D3 (Inclusive Design), D7 (Public Realm), HC1 (Heritage Conservation and Growth) and HC3 (Strategic and Local Views).

NPPF: Chapter 3 (Plan-Making), Paragraph 28, Chapter 9 (Promoting Sustainable Transport), Paragraph 110 c, Chapter 12 (Achieving Well-designed Places), Paragraphs 124, 125, 127, 130 & 131 and Chapter 16 (Conserving and Enhancing the Historic Environment), Paragraphs 185, 189, 190 & 192-199.

6.27 Responding to Places - Supporting Text

- 6.27.1 The Neighbourhood Plan Area has already experienced development pressure and will continue to do so. The Forum wants to ensure that this development pressure delivers new development that responds to its context and is of the highest built-environment quality.
- 6.27.2 The NP area already supports a number of important industrial uses. New development in these existing industrial areas must include new mixed-use building typologies and environments that allow for existing and new industrial activity to co-exist with other uses including residential, retail and community uses.
- 6.27.3 The NP area also supports a well-established residential community, which sits alongside the existing industrial areas. Opportunities exist as part of the transformation of the existing industrial areas to improve connectivity into and through the area, to enhance the quality of the public realm and improve pedestrian accessibility and comfort. New development should ensure that there are no adverse impacts on neighbouring amenity, including impacts on the Regents Canal towpath.
- 6.27.4 As part of any public-realm enhancement the opportunity also exists to enhance the natural environment. Camley Street Natural Park sits to the south and the canal runs through the area. As part of any redevelopment, the opportunity should be taken to enhance and extend the 'green and ecological' network north, east and westwards. The opportunity to improve access to and along the canal should also be maximised.
- 6.27.5 Notable heritage assets within the Plan area (as stated within the Regents Canal Conservation Area Appraisal and Management Plan) include: The Constitution pub, Jubilee Waterside Centre, the retaining wall to the former Midland Railway Goods Yard, the canal tow-path, St. Pancras Lock, the entrance gates to Camley Street Natural Park, the Oblique Bridge at the north of Camley Street, and the St. Pancras mainline railway bridge crossing the canal at Camley Street. There are also two statutory listed buildings: the Grade II Listed Lock Keeper's Cottage and the Grade II

Listed Steam Locomotive Water Point. These heritage assets make a positive contribution to the character and appearance of the area and hence any new development should seek to preserve and enhance the settings of these assets.

- 6.27.6 In addition, there are a number of townscape features and views that contribute to the character of the NP area. These features and views are shown on Figures 43 and 44. Any new development should seek to preserve and enhance these features and views.

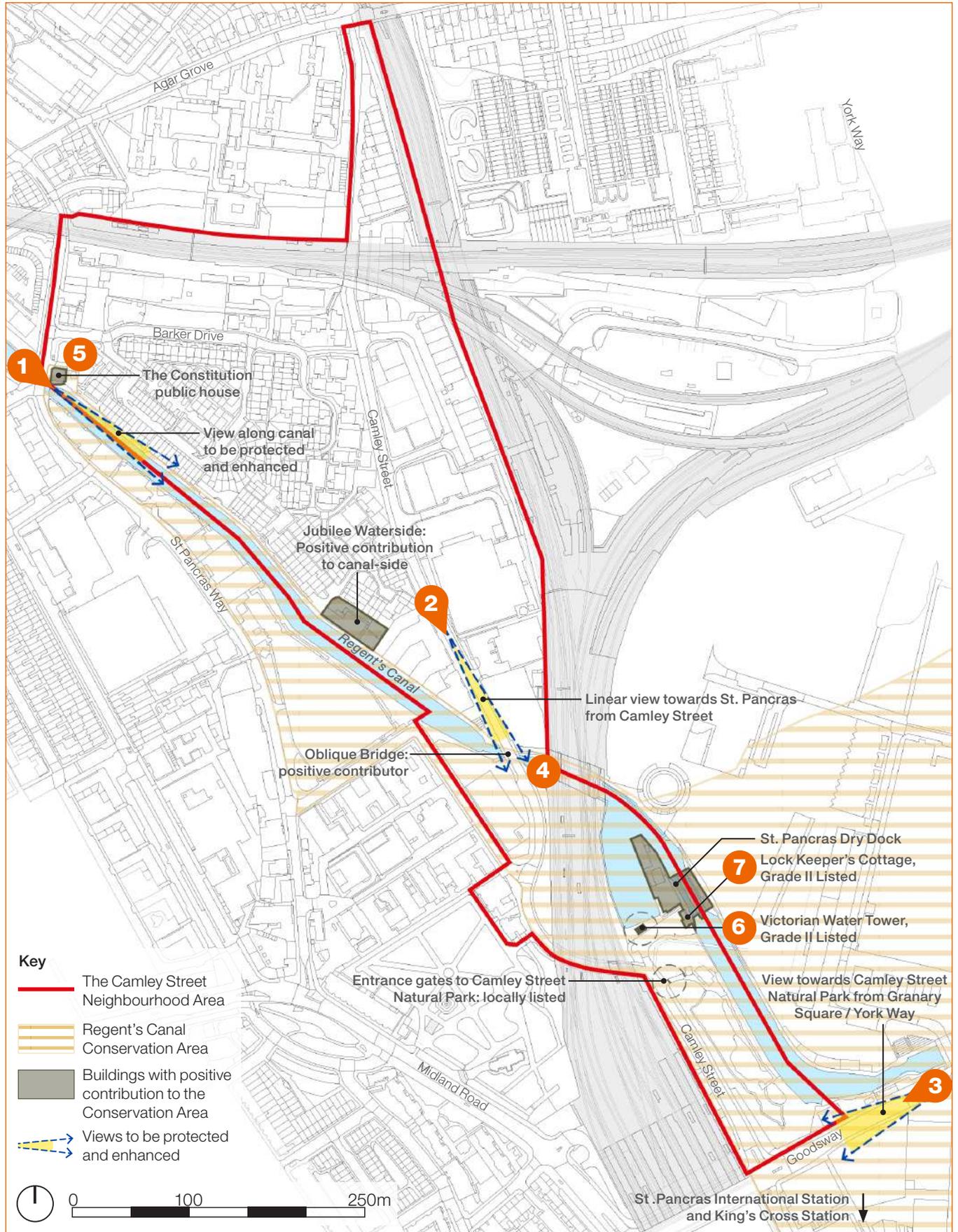


Figure 43: Important Heritage Features and Local Views

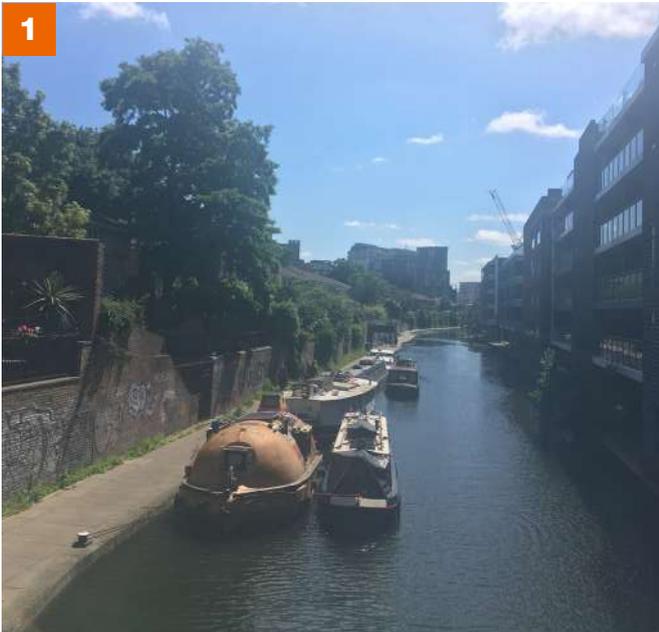


Figure 44: Photographs of Important Heritage Features and Local Views

6.28 Policy CS DQ2
- Connectivity, Accessibility and Legibility

Policy Objective

6.28.1 Development proposals should look to promote wayfinding and accessibility throughout the NP Area.

Policy CS DQ2 - Connectivity, Accessibility and Legibility

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, taking into account the key accessibility opportunities and constraints identified in Figure 45.

Conformity with other policies

Local Plan: D1 (Design) and T1 (Prioritising Walking, Cycling and Public Transport).

London Plan: D7 (Public Realm), D8 (Tall Buildings) and D1 (London's Form and Characteristics).

Draft New London Plan: D1 (London's Form, Character and Capacity for Growth), D2 (Delivering Good Design), D3 (Inclusive Design), D7 (Public Realm) and D8 (Tall Buildings).

NPPF: Chapter 8 (Promoting Healthy and Safe Communities), Paragraphs 91-95 a and Chapter 12 (Achieving Well-designed Places), Paragraphs 127 a, b, d & f & 131.

6.29 Connectivity, Accessibility and Legibility
- Supporting Text

6.29.1 The NP Area currently suffers from poor east to west connectivity and access to public spaces, particularly for persons with mobility issues. This has been particularly acknowledged within the Regent's Canal Conservation Area Appraisal, which maintains that disabled access points to the tow-path are lacking. The residential and industrial areas are 'severed' north-south via Camley Street. As such, opportunities exist to improve crossings and pedestrian and cyclist comfort and safety.

6.29.2 Paramount to the Forum's vision for the redevelopment of the area is planning for a new, mixed-use, sustainable neighbourhood and community. In order to achieve this, Policy CS DQ2 expects development proposals to address current design issues that are pertinent to the NP area and maximise opportunities to increase physical and visual access to green infrastructure, including the Regent's Canal.

6.29.3 Improvements to signposting and wayfinding are encouraged, in particular at the main entrance points at Barker Drive, next to The Constitution pub, next to the Co-op, and at the junction between Camley Street and Agar Grove, in order to give directions to visitors and give context to where they are located within the wider area. High-quality and locally distinctive signposting will be sought, in addition to street lighting and street furniture, including bins and benches. Locally important heritage features along the canal tow-path such as the mooring bollards should be retained and enhanced. Where possible, informal planting should be incorporated into these improvements.

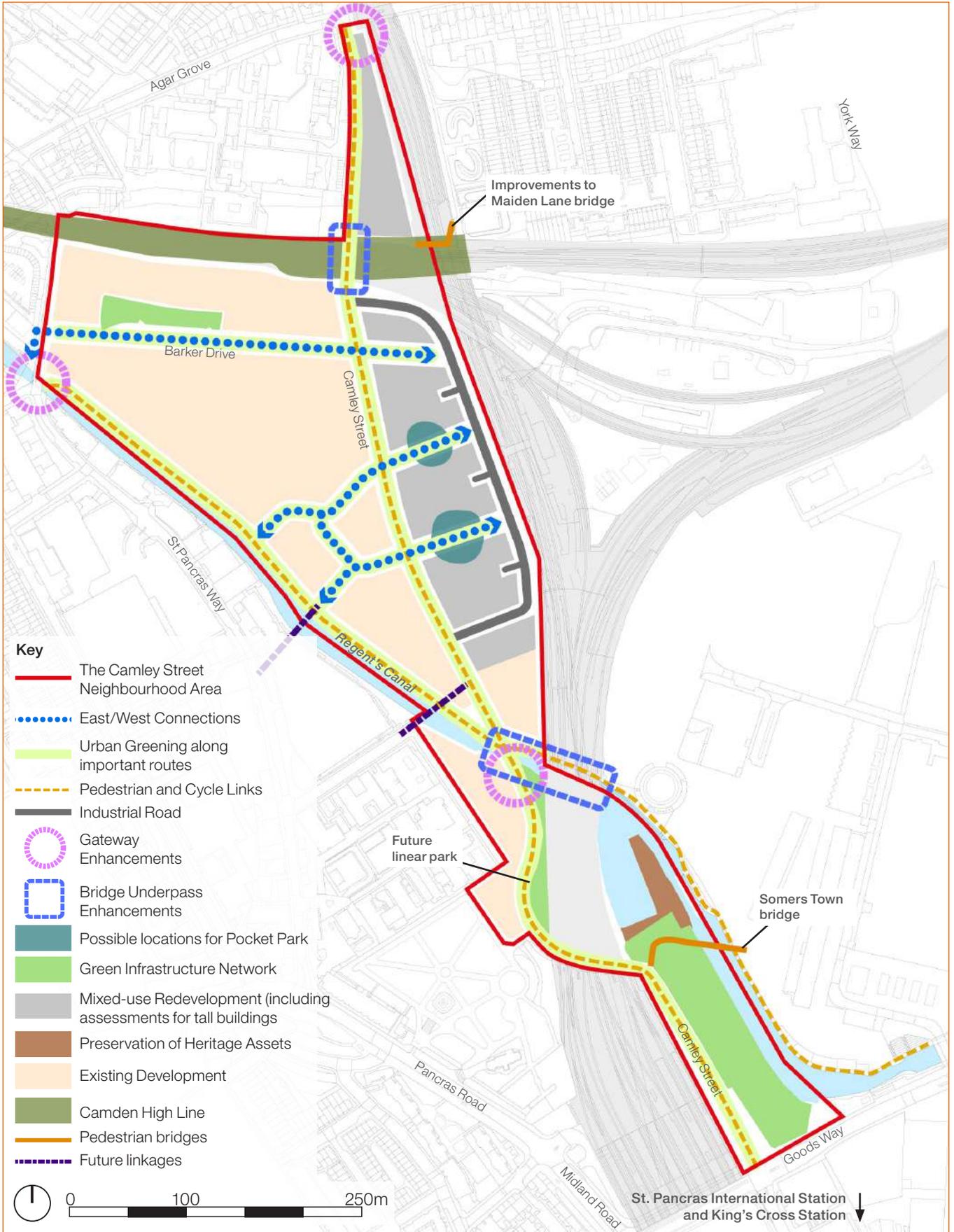


Figure 45: Plan identifying opportunities for new connections in relation to Policy CS DQ2

6.30 Policy CS DQ3
- Proposals For Tall Buildings

Policy Objective

6.30.1 The Forum recognise the role that tall buildings play in assisting with accommodating density and growth, adding interest to the skyline and variety to the street scene. However, not all locations are suitable for tall buildings. In order to ensure that tall building proposals are sustainable, appropriate and well designed Policy CS DQ3 provides guidance that should be applied early on within the design process.

Policy CS DQ3 - Proposals for Tall Buildings

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 45), provided other policy requirements are met and where possible:

- a) Demonstrate outstanding architecture and incorporate high-quality materials, finishes and details;
- b) 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;
- c) Relate well to existing street widths and make a positive contribution to the streetscape;
- d) Generate an active street frontage, particularly along Camley Street;
- e) Provide accessible public space within their curtilage;
- f) Incorporate sufficient communal space;
- g) Contribute to defining new and existing public routes and spaces;
- h) Promote legibility throughout the NP Area;
- i) Create new and enhance existing views, vistas and sight lines;
- j) Preserve or enhance heritage assets and the views to/from these and contribute positively to the setting of heritage assets, including conservation areas.

In addition, any tall building will be expected to consider and manage its impact on micro-climatic conditions and existing amenity.

Conformity with other policies

Local Plan: D1 (Design).

London Plan: D7 (Public Realm), D8 (Tall Buildings) and D1 (London's Form and Characteristics).

Draft New London Plan: D1 (London's Form, Character and Capacity for Growth), D2 (Delivering Good Design), D3 (Inclusive Design), D7 (Public Realm), HC3 (Strategic and Local Views), HC4 (London View Management FD8 (Tall Buildings)).

NPPF: Chapter 12 (Achieving well-designed places), Paragraphs 124, 126, 127 b & e, 130 & 131.

6.31 Proposals for Tall Buildings
- Supporting Text

5.31.1 The wider King's Cross development context around Camley Street includes Maiden Lane, Agar Grove, the recent developments on Camley Street and King's Cross itself to the east. The Forum recognises that the comprehensive redevelopment of the Cedar Way Industrial Estate and associated industrial land parcels creates an opportunity to deliver a greater intensity of development, including the use of tall buildings (defined as buildings that are substantially taller than their surroundings).

5.31.2 The Forum wants to ensure that any tall buildings contribute positively to the townscape and improve the public realm that surrounds them. The mixed-use area (Figure 45) could have potential for tall buildings subject to assessment against relevant policies, particularly policy D1 of the Local Plan, which outlines the sensitivity of tall buildings throughout Camden, and how they ought to be assessed. The NP area falls within strategic views from Parliament Hill and Kenwood House, as shown on Figure 47, and further defined within the London Plan and the London View Management Framework Supplementary Planning Guidance.

5.31.3 Figure 45 indicates where such taller buildings will be assessed subject to the criteria set out in policy CS DQ3 and Local Plan Policy D1. It is particularly important that built development provides a sensitively designed frontage to Camley Street, and respects longer strategic views across the site, particularly those from Parliament Hill and Kenwood House.

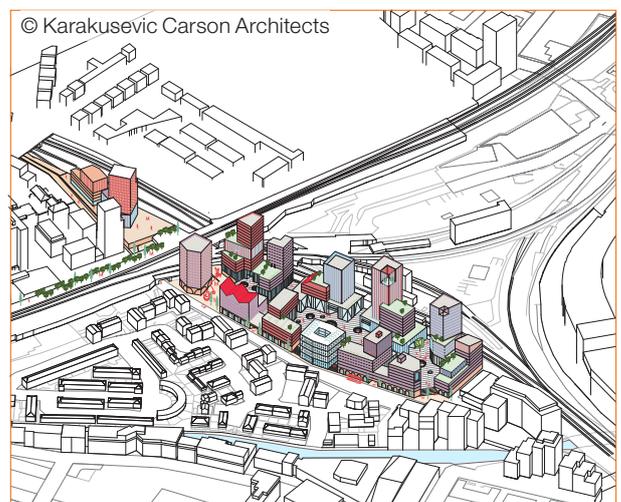


Figure 46: Illustrative drawing of Camley Street area. The suitability of tall buildings would need to be assessed through policy DQ3.

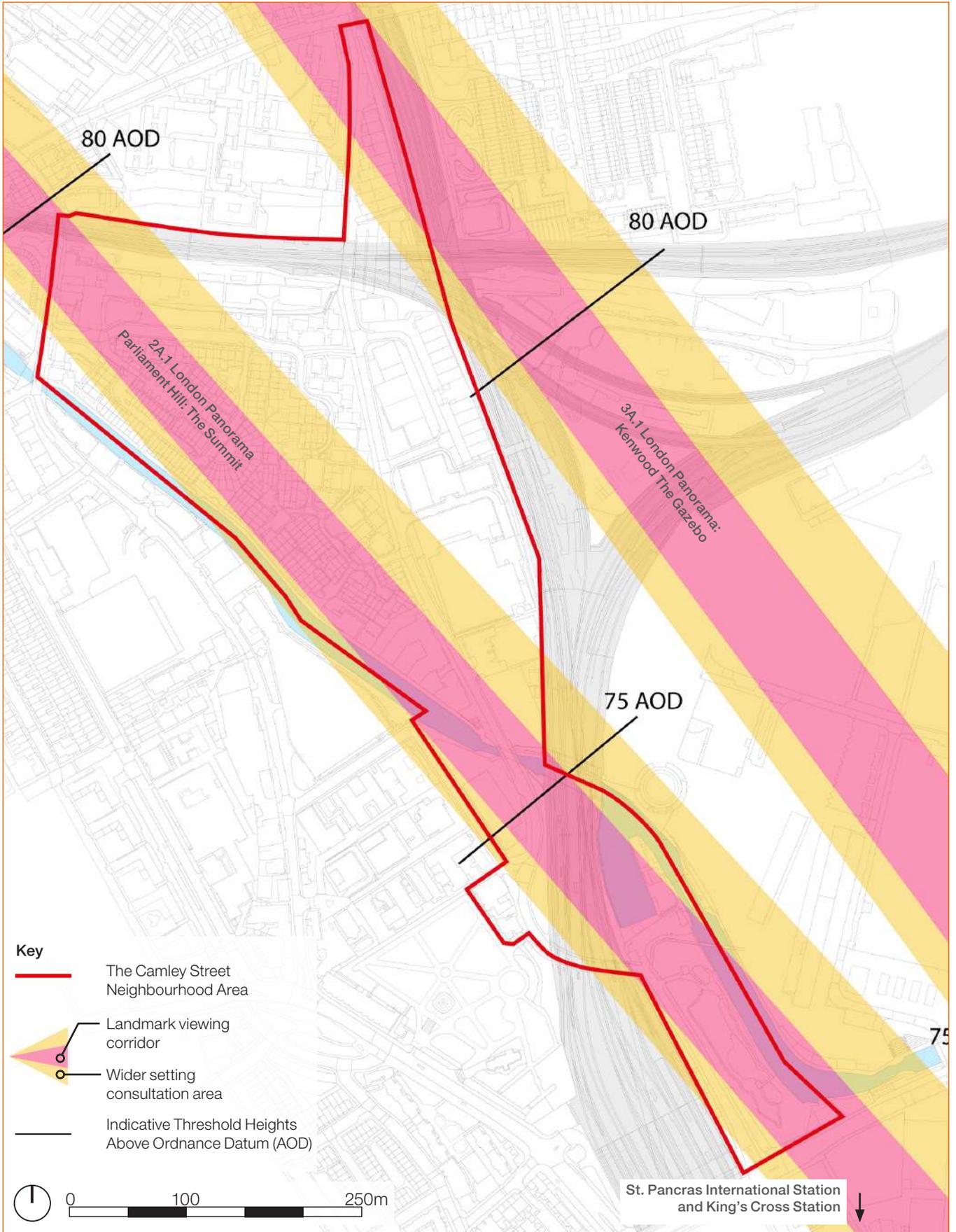


Figure 47: Plan highlighting strategic views falling within the Neighbourhood Area

7 Glossary and References

Glossary of terms

Acronym	Name/Subject	Description
	Adopted Local Plan	The existing Planning Policy Document that sits above the Neighbourhood Plan and sets out strategic and site-specific policies which apply to all development proposals throughout the Borough. This is known as the London Borough of Camden Local Plan, 2017.
	Affordable Housing	<p>The NPPF 2018 defines affordable housing as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local works); and which complies with one or more of the following definitions:</p> <ul style="list-style-type: none"> • Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable; (b) the landlord is a registered provider, except where it is included as part of Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Building to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent). • Starter homes: is as specified in Sections 2 and 3 of the House and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used. • Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. • Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.”

(Continued overleaf)

(Continued from previous page)

Acronym	Name/Subject	Description
	Affordable Workspace	Affordable workspace is defined (within the London Plan) as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It can be provided directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.
CSNF	Camley Street Neighbourhood Forum	LB Camden-designated forum progressing the Neighbourhood Development Plan.
CSNP	Camley Street Natural Park	Designated Site of Metropolitan Importance for Nature Conservation (SINC) and a Local Nature Reserve. Situated along the Western bank of the Regent's Canal, the Park has recently benefited from investment as a result of the redevelopment scheme at King's Cross and fundraising by its managers, London Wildlife Trust.
CSNDP	Camley Street Neighbourhood Development Plan	(This document) Neighbourhood Development Plan prepared by the Camley Street Neighbourhood Forum to guide Camden Council on making future decisions for the area. Once the Plan is adopted it will become part of Camden's Local Plan and will hold material weight.
CIL	Community Infrastructure Levy	In April 2010, a number of measures within the Community Infrastructure Levy Regulations came into force. These changes restricted the use of planning obligations and clarified the differentiation between planning obligations and CIL. The levy is a local charge that all local authorities in England and Wales can choose to charge on new developments in order to fund infrastructure projects. The London Borough of Camden CIL Charging Schedule was adopted in April 2015.
	Consultation Plan	A consultation plan is statutorily required to accompany a neighbourhood plan as per the Localism Act 2011. The Consultation Plan must set out what consultation was undertaken and how this informed the Neighbourhood Plan.
	Evidence Base	A robust quantitative and qualitative evidence base should be used to inform the development of Neighbourhood Plan policies. This can include census data, consultation responses, information from organisations and bodies responsible for protecting natural environments, information from organisations and local interest groups, existing documents and strategies for the Plan area and information from adjoining local planning authorities and neighbourhood planning groups, etc.
	Evidence Base Summary	Document produced as part of the statutory process of developing the Camley Street Neighbourhood Plan.
	Examination	An independent review of the Neighbourhood Plan carried out in public by an Independent Examiner prior to adoption.
	Green Infrastructure	Network of accessible, green and open spaces.
	Independent Examiner	Following consultation (regulation 16), the Council will appoint an independent examiner to assess the Neighbourhood Plan against the basic conditions, informed by feedback from the consultation. The examiner will recommend whether the Plan is taken forward to referendum.
LBC	London Borough of Camden	The Local Authority for Camley Street.
	The Localism Act	The Localism Act 2011 is an Act of Parliament that changes the powers of local government in England. The aim was to devolve plan-making powers to local communities through Neighbourhood Development Orders and Neighbourhood Development Plans.

Acronym	Name/Subject	Description
LWT	London Wildlife Trust	The Trust was founded in 1981 to protect, conserve and enhance the biodiversity of Greater London through land management, community engagement, research, political advocacy, campaigns and environmental education. Camley Street Natural Park is one of 37 nature reserves the Trust currently manages.
MCIL	Mayoral Community Infrastructure Levy	In London, the Mayor of London is a charging authority for the purposes of Part 11 of the Planning Act 2008 and can therefore charge CIL in respect of new development within Greater London in addition to Borough-level CIL. The Mayoral charging schedule was adopted in April 2019 and the charging rate for Camden is £80 per sqm.
	Mixed-use Development	Developments where more than one use is constructed. This may be site-wide or within the same building.
NPPF	National Planning Policy Framework	The National Planning Policy Framework was adopted in July 2018 (and updated in February 2019). It consolidated and set out the Government's planning policies for England and how they are expected to be applied. All development plans, including Neighbourhood Development Plans, are expected to be prepared in accordance with the NPPF.
NP/NDP	Neighbourhood Development Plan	Commonly referred to as Neighbourhood Plans, they were introduced under the Localism Act 2011. Subject to examination in public and approval by public referendum, plans will form part of the adopted Local Development Framework and will be used by the Council in the determination of planning applications.
	Plan Period	The period for which the Camley Street Neighbourhood Plan will set policy. This will be from adoption.
	Planning Obligations	Planning Obligations (also known as Section 106 Agreements as per The 1990 Town and Country Planning Act) are private agreements made between local authorities and developers and can be attached to a planning permission in order to make acceptable development that would otherwise be unacceptable in planning terms. Planning obligations must be directly relevant to the proposed development.
	Referendum	A general vote by the electorate on a single political question that has been referred to them for a direct decision.
SA	Sustainability Appraisal	A process of appraising policies for their social, economic and environmental effects, which must be applied to all Development Plan Documents and was required for the Camley Street Neighbourhood Plan.
SEA	Strategic Environmental Assessment	Compulsory assessment as per European Directive 2001/42/EC, commonly known as the Strategic Environmental Assessment or SEA Directive. It has been implemented in planning through Sustainability Appraisals of Development Plan Documents and Neighbourhood Plans.
SHLAA	Strategic Housing Land Availability Assessment	An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing use over the plan period. The assessment of land availability is an important step in the preparation of a Local Plan, and forms part of the evidence base.
SUDS	Sustainable Urban Drainage Systems	Sustainable Urban Drainage Systems (SUDS/SuDS/SuDdS) are designed to reduce the potential impact of new and existing developments with respect to surface water drainage discharge. Types of SUDS include: green roofs, permeable surfaces, infiltration trenches, swales and purpose built ponds/wetlands.

