

Triggs, Andrew

From: Adrian Davis [REDACTED]
Sent: 21 October 2019 12:01
To: PlanningPolicy
Cc: Kathryn Southworth
Subject: Camley Street Neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Policy, I am a resident of Elm Village [REDACTED] and have worked with the Camley Street Forum to make the views of **residents** known to those who wrote the Neighbourhood Plan (with my wife, Kathryn Southworth). I think it is a good plan that has come from much discussion and answers residents and business questions about the future of the area. So please note that we support the Camley Street Neighbourhood Plan and think that Camden should adopt this plan (and clearly take notice of it in its overview of this vibrant and expanding area!). I am happy to take part in work to take this plan forward and we would be happy to take part in public participation should there be any such opportunity.

Yours sincerely,

Professor Adrian Davis OBE Hon D PhD FFPHM FSS and Kathryn Southworth

[REDACTED]

Triggs, Andrew

From: RL Accounts [REDACTED]
Sent: 19 October 2019 13:07
To: PlanningPolicy
Subject: CAMLEY STREET

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted.
I work in the Camley Street Plan Area.

Ahmed Waza

29, Cedar Way Industrial Estate
London
N1C 4PD

Triggs, Andrew

From: Alex Smith [REDACTED]
Sent: 21 October 2019 11:42
To: PlanningPolicy
Subject: I support the Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted.

Further, now Camden has declared a Climate Emergency, should a key provision in the plan, retention of current jobs, not be enacted, it would be contrary to the Climate Emergency provisions.

I have worked in the Camley Street Plan Area for over 35 years and am part of the strong community here

Alex Smith

Founder

Alara Wholefoods

--

Alex Smith
Founding Director
Alara

Triggs, Andrew

From: [REDACTED]
Sent: 14 October 2019 15:03
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live/work in the Camley Street Plan Area.

Ani Mavrioz
[REDACTED]

Triggs, Andrew

From: [REDACTED]
Sent: 22 October 2019 11:13
To: PlanningPolicy
Subject: Camley street

Follow Up Flag: Follow up
Flag Status: Flagged

Hello

Just a short email to register my support for the Camley Street Neighbourhood plan. As a resident of elm village, I feel it is incredibly important to try and maintain the sense of community that this area currently enjoys. It is so rare these days and must be respected and encouraged.

Thank you

Anna McQuaid

Sent from my iPhone

Triggs, Andrew

From: [REDACTED]
Sent: 25 October 2019 17:20
To: PlanningPolicy
Subject: Camley StreetNeighbourhood Development Plan (2019-2034) Submission version

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan Area.

However I have a couple of comments that I would like to make.

I would like to see Camley Street opened up more to Agar Grove to allow a bus service to run down Camley Street. It would improve and enhance the area if there was wider usage and connection to other areas. Camley street is a lovely boulevard and has the potential to be a larger more open area for pedestrians, cyclists and a bus service to join up communities and allow the elderly, those with limited mobility and families to access the area. The access from Agar Grove should be restricted to pedestrians, cyclists and a bus service and not used by cars and commercial traffic. This would also help to make the area a better environment, more welcoming and safe.

I do wish to see employment continue in the neighbourhood, but I do not wish to see anymore light industry and in fact would prefer to see more varied businesses in the area, more office space shared work spaces, to increase flexibility, shops and services for local people. When the light industry businesses are not open in the evenings and at the weekends the area attracts anti social behaviour with lots of cars parking on their spaces with drug dealing and prostitution occurring.

I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

Anne Wooding [REDACTED]

Triggs, Andrew

From: Bernadette Mortiboy [REDACTED]
Sent: 26 October 2019 20:51
To: PlanningPolicy
Subject: Camley st neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

I support the camley street neighbourhood plan, our house is in the elm village area Bernadette Mortiboy Sent from my iPhone

Triggs, Andrew

From: [REDACTED]
Sent: 24 October 2019 10:16
To: PlanningPolicy
Cc: John Chamberlain; George Coulouris
Subject: Camley Street Neighbourhood Forum neighbourhood plan
Attachments: Camley Street Neighbourhood Forum neighbourhood plan.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To: planningpolicy@camden.gov.uk

Regarding: Camley Street Neighbourhood Forum neighbourhood plan consultation

Please find attached a response from Camden Cycling Campaign.

Please acknowledge receipt of this response. We would be very happy to discuss any aspect of our comments.

Regards

Jean Dollimore

on behalf of Camden Cycling Campaign

24th October 2019

To: planningpolicy@camden.gov.uk

Camley Street Neighbourhood Forum neighbourhood plan

These comments on the Camley Street Neighbourhood Forum neighbourhood plan are from Camden Cycling Campaign, the local borough group of London Cycling Campaign. We represent the interests of cyclists living or working in Camden and aim to expand the opportunities for all to cycle safely in the borough. We have discussed this consultation by email and online (using Cyclescape).

We understand that the plan is now at the submission stage and will be sent to the Inspector with any comments received and that the formal ("Regulation 14") consultation was in late 2018. Unfortunately Camden Cycling Campaign were not on the list of statutory consultees provided to the Forum by LB Camden and we did not become aware of the consultation.

We therefore ask you to send the following two comments to the inspector with your support:

1. It is surprising that the Camley–Agar pedestrian and cycle link is not shown on the transport map on page 43 and is not specifically mentioned in Policy CS TR2. It is shown in Figure 45 though not specifically mentioned in the text. We believe that it is a key link and should have more prominence.
2. We strongly object to the weakening of in Policy CS TR1 "Managing Industrial Traffic" following the consultation in 2018, from

"Industrial traffic should be segregated from pedestrian and cycle routes in order to minimise conflicts and air and noise pollution" to

"Segregating industrial traffic from pedestrian and cycle routes, *where practicable*, in order to minimise conflicts and air and noise pollution"

since people cycling on the route through Camley Street should not have to share space with industrial traffic.

Please acknowledge receipt of this response. We would be very happy to discuss any aspect of our comments. Our contact details are below.

Jean Dollimore, John Chamberlain, George Coulouris and Paul Allen

john@camdencyclists.org.uk

Camden Cycling Campaign, [REDACTED]

Triggs, Andrew

From: Adam Richards [REDACTED]
Sent: 30 September 2019 15:28
To: PlanningPolicy
Cc: Simon Pitkeathley
Subject: Camley Street Neighbourhood Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

I am writing on behalf Camden Town Unlimited, the business improvement district for Camden Town in response to the Camley Street Draft Neighbourhood Development Plan consultation.

We do not object to the Draft Plan however there are some issues that we believe need to be considered:

- Camley Street presents a unique opportunity to create new home and jobs in the Borough because the majority landowner in the area is Camden Council. We believe the Plan should accommodate a greater range of social housing than what is currently described as “affordable homes” i.e. London Affordable Rent and rent-to-buy products.
- We support the principle of intensification of both housing and employment floorspace, however we believe too much emphasis has been put on retaining specific individual businesses and not the overall designation of employment floorspace in the area. Instead we would like to see the provision of affordable workspace that is open to all.
- We welcome the references to the Camden Highline. And would just wish to ensure that no part of the plan negatively impacts upon the Camden Highline proposal. This concern includes anything that would affect access or viability.
- We would also ask that the references to the Camden Highline include commitments that any CiL, S106 or Green Spaces funding include significant contributions towards this key public realm project.

Very best wishes,

Adam Richards

Adam Richards
Camden Highline

l: www.linkedin.com/in/mradamrichards



Camden Town Unlimited
Top Container
5-7 Buck Street
London NW1 8NJ

Become a Friend of the Camden Highline! → www.camdenhighline.com

#CamdenHighline

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Triggs, Andrew

From: Claire McLean [REDACTED]
Sent: 24 October 2019 15:41
To: PlanningPolicy
Subject: RE: Camley Street Neighbourhood Plan consultation
Attachments: image005_wmz was removed from this message; Camley Street Draft NP Consultation CRT Response 2019.pdf

Dear Sir/Madam,

Thank you for this recent consultation – please find attached my response on behalf of the Canal & River Trust, and feel free to contact me if you have any further queries.

Kind regards,

Claire McLean MRTPI

Area Planner London
[REDACTED]

Canal & River Trust

The Toll House, Little Venice, Delamere Terrace, London W2 6ND

Please note, my working days are Tuesday, Wednesday and Thursday.



canalrivertrust.org.uk

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River Trust**
Making life better by water

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From: Camden Council <CamdenCouncil@public.govdelivery.com>

Sent: 11 September 2019 16:07

To: Claire McLean <Claire.McLean@canalrivertrust.org.uk>

Subject: Camley Street Neighbourhood Plan consultation



**Canal &
River Trust**

Making life better by water

Regeneration and Planning

London Borough of Camden

Judd Street

London

WC1H 9JE

24 October 2019

Dear Sir / Madam

Camley Street Neighbourhood Plan consultation

The Canal & River Trust is the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed, a way of sustainably draining surface water away from new developments and providing non-potable water. We would welcome on-going engagement with the Council and developers about the wide range of opportunities that our waterways provide.

Within the Neighbourhood Area, we own and manage the Regent's Canal and its towpath. We note that at the eastern side of the Neighbourhood Area the whole canal is included, whilst to the west the boundary line runs along the centre of the canal. Substantial areas of the canalside land within the area is currently being redeveloped (such as 101 and 102 Camley Street) or has recently been so (the Gasholders site, for example).

We note and welcome the recognition of the Regent's Canal's important role in the history of the area and its current value as a key pedestrian and cycle route and a vital green space. Whilst there is no obligation for Neighbourhood Plans to deal with all issues that may be relevant to the development of a planning strategy for the area, we would point out that the canal does and can have additional functions. For example, London has experienced a rapid growth in the number of people cruising the waterways and living on boats. There may be opportunities to use the Regent's Canal as a sustainable energy source for heating and cooling new

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk

developments. We have produce a short [guide](#) to planning for waterways in Neighbourhood Plans, which you may find helpful as the plan progresses.

CS CSN1

We welcome the focus on well-being in policy CS CSN1. However, it is framed in the context of community facilities and social infrastructure. The Trust considers that access to high quality waterway (and waterside) spaces can have important health and wellbeing benefits. Our recent publication “Waterways and Wellbeing” begins to present evidence on this link. We suggest that this link could be strengthened in this policy and/or across the plan, generally.

We believe that the canal has the potential to act as a setting for more cultural activities, whether this be through new on-water uses, art or community participation. In 2020 we will be marking the bicentenary of the Regent’s Canal (Regent’s 200) with a programme of public realm improvements along the canal (as a whole) in partnership with schools and other local groups. Camden Town Unlimited have produced a proposal for the section of canal between Kings Cross and Camden. We are working to seek funding to deliver improvements at four of these sites along the Regent’s Canal. We are also working with Camden Town Unlimited on a lighting proposal.

CS TR1

We are pleased to note the amendment to Policy CS TR1 to support the use of the Regent’s Canal for the movement of freight, particularly that related to demolition and construction activities at waterside sites. This accords with the existing and emerging London Plan.

CS TR2

We support the principle of new developments connecting to the Regent’s Canal towpath, as required by policy CS TR2. However, we would suggest that the policy should also recognise that new developments provide opportunities to enhance the canal corridor and to mitigate the impacts of additional users (we note, however, that would be covered by policy CS GI1 if waterways are included within the definition of green infrastructure and green corridors). We welcome the aim of creating a more legible cycle network in the area, improving inclusive access and wayfinding, and we would be happy to work with the Forum and others to help deliver this.

We are working with Camden Town Unlimited to consider the constraints and feasibility of lighting under bridge environments. There is only one which falls in the Camley Street area – Grays Inn Bridge (St Pancras Way).

The towpath would also benefit from the plan addressing the current accessibility from St Pancras Way (this link to the Quietway currently has steps and a wheeling channel) and the Camley Street connection (steps with wheeling channel).

CS GI2

We note the proposal in policy CG GI2 to ‘green’ the stretch of Regent’s Canal towpath within the Plan Area. We have no objection to the support for this in the plan in principle but we would want to discuss the details of this further in order to ensure that we retain sufficient space for all users in busy stretch of towpath, and that this aim is balanced with the needs of other users. The same is true of the proposal in CS GI3 for maximising the use of existing waterways within the NP area for nature and wildlife.

CS GI3

We note that policy CS GI3 refers to “the promotion of opportunities for local people to become involved within nature conservation work and biodiversity related activities”. We would be happy to discuss with the Forum what canal volunteering and/or local adoption opportunities might exist in the area.

Canal & River Trust

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In addition, please see our comments on CS GI2.

CS DQ1

We suggest that in addition to aiming to protect existing dwellings from overshadowing, the plan should seek to prevent impacts of development, such as overshadowing, adversely affecting the enjoyment of visitors and residents using the area's public spaces, such as the Regent's Canal.

Figure 45

We note that the Forum identify aspirations for 'gateway enhancements' to the canal and 'bridge underpass enhancements' on this map, as well as two future linkages across the canal. We would be happy to discuss any ideas for these further.

CS DQ3

With regard to tall buildings, the policy should also acknowledge the potential impact on the Regent's Canal and towpath.

We would encourage consultation with canal users in the area, including the St Pancras Cruising Club and boaters moored adjacent to the 101 Camley Street development.

We would also be grateful if the Trust could be correctly identified as 'the Canal & River Trust' within the document.

Please do not hesitate to contact me with any queries you may have.

Yours faithfully,

Claire McLean MRTPI
Area Planner London

Claire.McLean@canalrivertrust.org.uk

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Triggs, Andrew

From: Carolyn Coney [REDACTED]
Sent: 14 October 2019 20:11
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

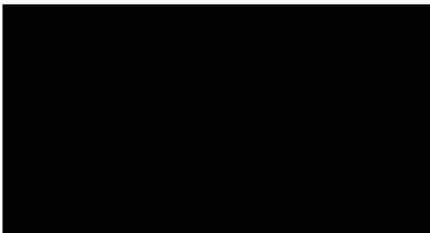
Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

Carolyn Coney



Triggs, Andrew

From: Lucy Battersby [REDACTED]
Sent: 25 October 2019 15:21
To: PlanningPolicy
Cc: Raoul Veevers; Adrian Owen; Tom Loake; Simon Rogers
Subject: Camley Street Neighbourhood Plan
Attachments: 251019 FINAL Camley St Neighbourhood Plan Representations.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

On behalf of our client, CBREGI, we write to submit representations in respect of the consultation exercise taking place on the submission version of the Camley Street Neighbourhood Development Plan.

CBREGI hold a long leasehold interest of 104 Camley Street and are currently exploring options to redevelop the site. We would welcome the opportunity to discuss the content of the Draft Neighbourhood Development Plan further with both the Council and Camley Street Neighbourhood Forum to ensure the site is appropriately represented.

Please find a copy of our representations attached.

I would be grateful if you could confirm receipt of this email and its attachment.

Should you wish to discuss any of the above please do not hesitate to contact myself or my colleague Raoul Veevers.

Kind regards,

Lucy

**Lucy Battersby MRTPI
Planner**

Montagu Evans LLP
5 Bolton Street, London W1J 8BA

[REDACTED]
Switchboard: 020 7493 4002
Email: Lucy.Battersby@montagu-evans.co.uk
Website: www.montagu-evans.co.uk



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PD12330/RV/LB

25 October 2019

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London
WC1H 9JE

Sent via email to planningpolicy@camden.gov.uk

Dear Sir/Madam

CAMLEY STREET NEIGHBOURHOOD DEVELOPMENT PLAN (2019-2034) SUBMISSION VERSION (REGULATION 16) (OCTOBER 2019)

REPRESENTATIONS ON BEHALF OF CBREGI IN RESPECT OF 104 CAMLEY STREET

These representations are submitted by Montagu Evans LLP on behalf of CBREGI in respect of the consultation exercise on the submission version (Regulation 16) of the Camley Street Neighbourhood Development Plan.

We previously submitted representations on the Regulation 14 pre-submission version of the Camley Street Neighbourhood Development Plan in January 2019. This current Regulation 16 consultation phase is seeking further views on an updated set of area-specific core objectives and corresponding policies to guide development within the Camley Street Neighbourhood Area over the period 2019 to 2034.

It is understood that once the Neighbourhood Development Plan has been through examination and is formally adopted, it will form part of the statutory development plan for the London Borough of Camden.

Background and context to these representations

CBREGI hold a long leasehold interest of 104 Camley Street and are currently exploring options to redevelop the Site. It is currently occupied by a two storey office building (Use Class B1) which provides accommodation for Hewlett Packard's disaster recovery unit.

The Site forms part of a wider development allocation for Camley Street and there are a number of approved schemes coming forward in the surrounding area. 102 Camley Street is located to the south and is currently under development for offices and residential (ref. 2014/4381/P). 103 Camley Street is located opposite and has recently been developed for student accommodation, residential and offices (ref. 2011/5695/P).

In August 2018 Camden Council prepared the Camley Street Area Vision document. This recognises that the current employment premises at Camley Street fail to make the most efficient use of land. What the Vision requires is a "... *higher density use of land to include significant new employment space and housing, in the form that helps Camley Street become more of a connected, outward looking and active street*".

104 Camley Street forms part of a site-specific allocation (104-114 Camley Street). The development priorities for this area include:

- Increasing north-to-south permeability;
- Maintaining service access to existing workspace;
- Creating new open space; and

- Facilitating active street frontages.

As a key stakeholder along Camley Street, CBREGI wish to fully understand the intentions of the emerging Neighbourhood Development Plan and how the proposed objectives and policies relate to Camden Council's Camley Street Vision.

Following our January 2019 representations on the pre-submission version of the Neighbourhood Development Plan we have reviewed the changes made within the submission version of the Plan and set out our position in the sections below.

The Camley Street Neighbourhood Area

The extent of the Camley Street Neighbourhood Area is illustrated in Figure 1 of the Neighbourhood Development Plan (see below screenshot). The Plan appears to illustrate the existing land-uses however this is not clear from the titling of the plan. We suggest the title is updated to read '*Existing land-uses of the Camley Street Neighbourhood Area*'.

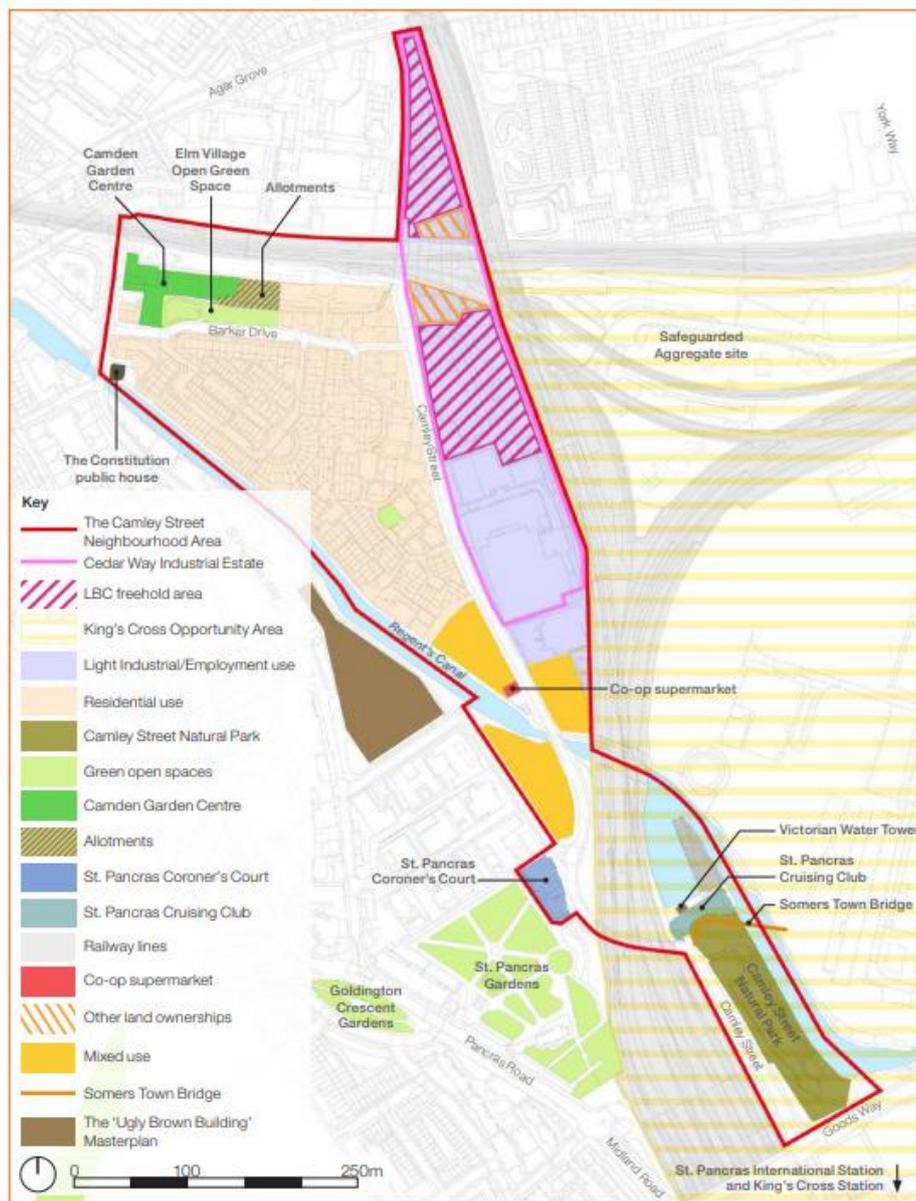


Figure 1: The Camley Street Neighbourhood Area (NB: Land ownership boundaries are not exact)

This labelling is important as currently 104 Camley Street is illustrated as falling within 'Light Industrial/Employment Use' and a figure used later in the Plan (Figure 45) shows the Site falling within a 'Mixed-Use Development' designation. Therefore to avoid any contradictory interpretation of policy we request Figure 1 is updated to clarify that it reflects the existing land-use situation.

Core Objective 1: Employment (EM Policies)

Emerging Policies CS EM1 (*Employment Floorspace Provision*) and CS EM2 (*Retention of Existing Businesses*) continue to require redevelopment proposals for sites containing existing employment uses to retain and preferably increase the quantum of business and industrial floorspace, where feasible. The emphasis of emerging Policy CS EM1 continues to be on existing B1(c) light-industrial and B8 storage floorspace which relates to the Cedar Way Industrial Estate, to the north and exclusive of 104 Camley Street. It seems there is a drive to safeguard B1(c) and B8 uses in the context of delivering a broader mix of uses (commercial & residential) within the wider Camley Street area.

Emerging Policy CS EM1 also still requires the redevelopment of existing employment sites to provide additional class B uses for small and medium sized enterprises (SMEs), a proportion of which should be suited to meeting the needs of both start-up and move-on space. The Neighbourhood Development Plan continues to be silent on 104 Camley Street as an existing employment location, and in our view the relative inactivity of 104 Camley Street would not facilitate the incorporation of additional Class B uses for SMEs.

Part e of emerging Policy CS EM1 seeks all new B1 floorspace to provide the maximum viable amount of affordable workspace. Whilst supportive of this, we suggest the wording of this clause is fully aligned with the requirements of emerging Policy E3 of the new London Plan.

We note that 104 Camley Street is featured as Figure 14 '*DXC technology*' on page 25 of the Plan. In our view it is not relevant to include the Site within the commentary for emerging Policy CS EM1 given it is identified for mixed-use redevelopment later in the Plan. It is also not clear where this figure is referenced within the emerging policy. We therefore suggest removal of this image.

Emerging Policy CS EM2 specifically relates to existing businesses that offer employment opportunity to Camden residents and support the function of London's CAZ. Paragraph 6.7.7 recognises that the Bookers to the north of 104 (106-110 Camley Street) is a business which meets this criteria; however, 104 Camley is still not identified as a business that warrants retention. Similarly the supporting text specifically seeks protection of existing B1(c) and B8 uses, neither of which apply to 104.

CBREGI continue to support these emerging policies and the removal of 104 Camley Street from the employment area designation. It is recognised that the provision of high quality B1 office space to the north of the Site will facilitate the neighbourhood's continued function as a place of employment and light industry.

Core Objective 3: Housing (HO) Policies

Emerging Policy CS HO1 (*Affordable Housing Provision*) sets out that all developments proposing a residential element will be expected to contribute to the borough's affordable housing need by delivering the maximum viable quantum of affordable housing. The emerging policy sets out a minimum provision of 50% on publicly owned land and 35% on all other land and an aspiration of achieving 100%. We support that this emerging policy now aligns itself with the requirements prescribed in the new London Plan.

Emerging Policy CS HO1 presents a desired affordable mix of 60% London Affordable (or similar) rent and 40% intermediate products. Draft Policy H7 of the new London Plan sets out a preferred affordable housing tenure and proposes a split of 30% London Affordable or Social Rent, 30% Intermediate and the remaining 40% to be determined by the Borough. It is still our view that the Neighbourhood Development Plan should propose an affordable housing tenure mix which is consistent with the new London Plan.

Emerging Policy CS HO2 (*Residential Provision within Mixed Use Development*) outlines that "Proposals to redevelop sites that currently support industrial uses into mixed-use developments should provide at least 50% of

all additional floorspace created, of 1,000 sq.m. 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". To avoid confusion, we feel the wording of this policy should be tweaked to specify that the 50% of all additional floorspace refers specifically to additional 'residential' floorspace.

Emerging Policy CS HO2 rightly makes reference to Camden Local Plan Policy H2 which sets out the criteria used to determine whether housing should be provided on such sites and for deciding the most appropriate mix of housing and other uses. These criteria include the following:

- *The character of the development, the site and the area;*
- *Site size, and any constraints on developing the site for a mix of uses;*
- *Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;*
- *The extent of any additional floorspace needed for an existing user;*
- *The impact of a mix of uses on the efficiency and overall quantum of development; and*
- *The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing.*

For consistency we suggest expanding emerging Policy CS HO2 to capture the above criteria, notably to take into account the financial viability of the development when seeking to apply the emerging policy.

Core Objective 6: Design Quality (DQ Policies)

Figure 45 of the Plan appears to illustrate the accessibility, constraints and opportunities for development within the Camley Street area, in accordance with emerging Policy CS DQ2 (*Connectivity, Accessibility and Legibility*). Figure 45 has been updated as part of this Regulation 16 consultation exercise and now allocates 104 Camley Street for 'Mixed-use Redevelopment (including assessments for tall buildings)' (see below screenshot). CBREGI are supportive of this mixed-use allocation and also support positioning of the industrial road to front the northern boundary of their Site.

In terms of tall buildings, emerging Policy CS DQ3 (*Proposals for Tall Buildings*) continues to seek to generate an active street frontage along Camley Street and requires development to respond to the scale and grain of the wider Kings Cross context and the hierarchy of taller buildings in the area. CBREGI are supportive of this design approach.

Figure 45 has also been updated in this submission version of the Plan to show 104 Camley Street as an appropriate location for tall buildings. As per our January 2019 representations, we support incorporation of the Site into an area suitable for tall buildings given the recently approved and implemented developments in the surrounding area. The height and massing of a tall building on this Site would present a suitable transition on the southern periphery of the Cedar Way Industrial Estate and a natural step-up from the consented schemes to the south (102) and west (103) of the site. These developments both intend to rise to 12 storeys.

In accordance with emerging Policy CS DQ3, a tall building at 104 Camley Street will relate well to the hierarchy of taller buildings in the area and make a positive contribution to the streetscape. We therefore continue to support this emerging policy.

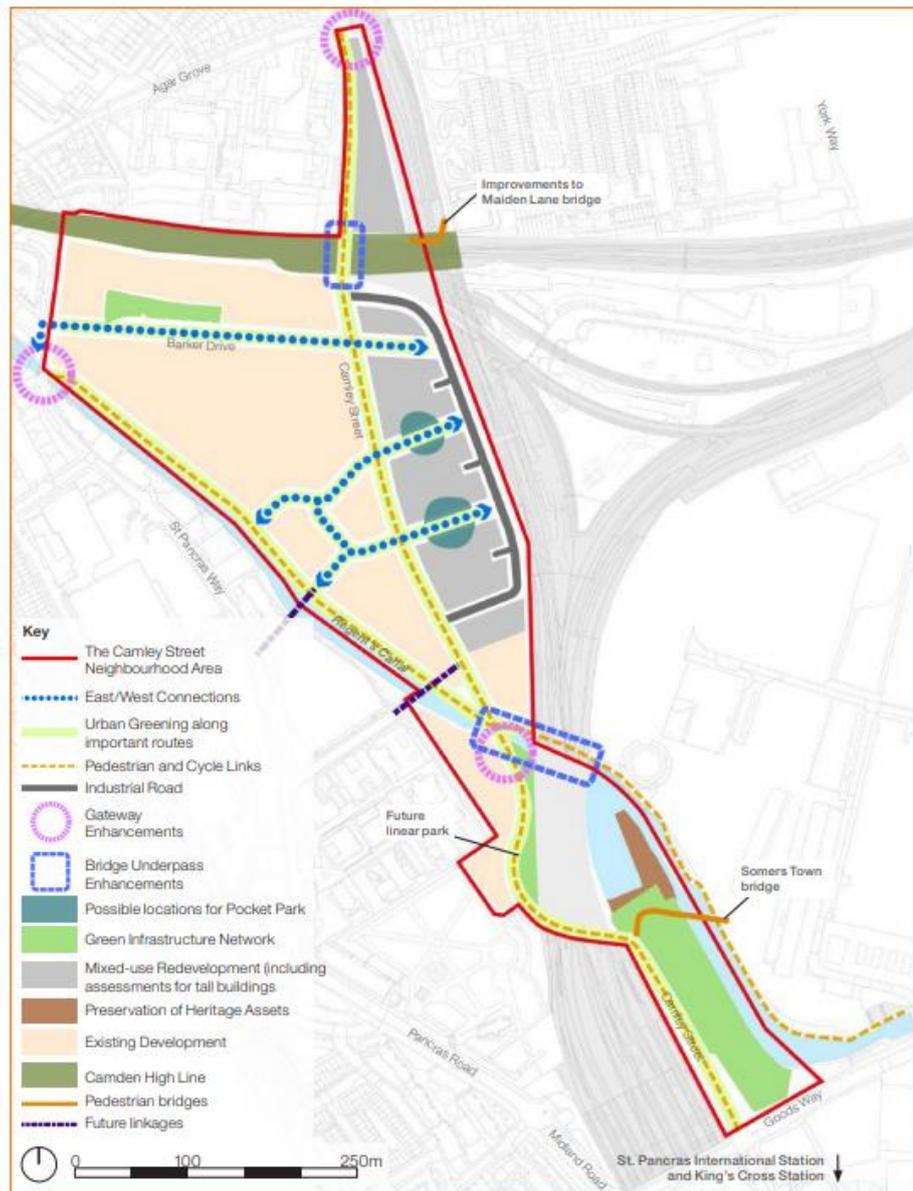


Figure 45: Plan identifying opportunities for new connections in relation to Policy CS DQ2.

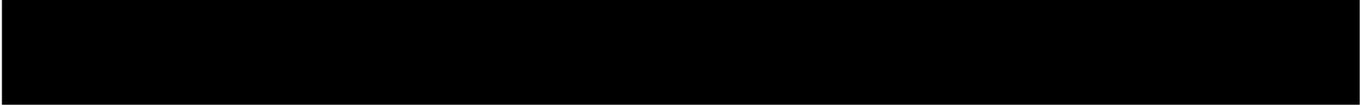
Summary

CBREGI hold a long leasehold interest of 104 Camley Street and are currently exploring options to redevelop the Site. They have requested we make representations on the submission version of the Camley Street Neighbourhood Development Plan (2019-2034) to assist with assessing the development potential of 104 Camley Street and to ensure its development is consistent with the objectives of Camden Council's Camley Street Vision and corresponding site allocation.

We are generally supportive of the amendments which have been made to the Neighbourhood Development Plan following issue of our earlier representations on the pre-submission version of the Plan in January 2019. We have re-considered emerging core objectives 1 (Employment), 3 (Housing) and 6 (Design Quality) and their corresponding policies, and where relevant suggested a number of minor amendments to the content of these. CBREGI support the proposed mixed-use designation of 104 Camley Street, as illustrated by Figure 45, but feel there could be improved clarity on the existing land-use situation, as demonstrated in Figure 1.

We continue to welcome the opportunity to discuss these matters further with both Camden Council and the Camley Street Neighbourhood Forum to ensure the Site is appropriately represented across all emerging development plan documents.

Yours sincerely


Montagu Evans

MONTAGU EVANS LLP

Montagu Evans LLP is a limited liability partnership registered in England and Wales. Registered number OC312072. A list of members' names is available for inspection at the registered office 5 Bolton Street, London W1J 8BA.

Triggs, Andrew

From: Christian Spencer-Davies [REDACTED]
Sent: 25 October 2019 15:54
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan support

Follow Up Flag: Follow up
Flag Status: Flagged

Just to let you know, as a business owner and employer in Camley Street for about 11 years now, I strongly support the communities neighbourhood plan.

PS I'm also a Camden resident NW8 0SL

Christian

CHRISTIAN SPENCER-DAVIES
Managing Director

AMODELS LTD
UNIT 17
CEDAR WAY INDUSTRIAL ESTATE
LONDON
N1C 4PD

[REDACTED]

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Triggs, Andrew

From: Christine Dystant [REDACTED]
Sent: 14 October 2019 17:56
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

Christine Dystant
[REDACTED]

Triggs, Andrew

From: Christine Rogers [REDACTED]
Sent: 23 October 2019 12:18
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live/work in the Camley Street Plan Area

Yours sincerely
Christine Rogers
[REDACTED]



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Triggs, Andrew

From: Claire Vernade [REDACTED]
Sent: 15 October 2019 18:44
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely
Claire Vernade
[REDACTED]

Triggs, Andrew

From: Robinson, Roger (Councillor)
Sent: 21 October 2019 10:56
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear colleagues

As one of the local ward councillors for St Pancras & Somers Town I fully support the Camley Street Neighbourhood Plan. It will be of great help and benefit to the area and it will be welcomed.

Best wishes

Cllr Roger Robinson
Ward Councillor for St Pancras and Somers Town

London Borough of Camden
Member's Room
Third Floor
218 Eversholt Street
London NW1 1BD


Web: camden.gov.uk

Triggs, Andrew

From: [REDACTED]
Sent: 15 October 2019 12:42
To: PlanningPolicy
Cc: Robinson, Roger (Councillor)
Subject: RE: CAMLEY STREET NEIGHBOURHOOD PLAN

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks for your support Roger, as always, very much appreciated.
Have copied your note on to Camden Planning.
Peter

From: Robinson, Roger (Councillor) <Roger.Robinson@camden.gov.uk>
Sent: 15 October 2019 12:27

[REDACTED]
Cc: Tomlinson, Paul (Councillor) <Paul.Tomlinson@camden.gov.uk>; Khatoon, Samata (Councillor) <Samata.Khatoon@camden.gov.uk>
Subject: RE: CAMLEY STREET NEIGHBOURHOOD PLAN

Dear Camden Planning PolicyTeam

I agree fully with Cllr Cotton's views and would wish to participate in the public hearing,

Sincerely

Cllr Roger Robinson
Ward Councillor for St Pancras and Somers Town

[REDACTED]
Cc: Tomlinson, Paul (Councillor) <Paul.Tomlinson@camden.gov.uk>; Khatoon, Samata (Councillor) <Samata.Khatoon@camden.gov.uk>; Robinson, Roger (Councillor) <Roger.Robinson@camden.gov.uk>
Subject: RE: CAMLEY STREET NEIGHBOURHOOD PLAN

Thank you for your support Richard,
Much appreciated.
Peter

Sent: 14 October 2019 18:02
To: planningpolicy@camden.gov.uk
Cc: paul.tomlinson@camden.gov.uk; samata.khatoon@camden.gov.uk; roger.robinson@camden.gov.uk; secretary@CamleyStreet.org.uk
Subject: CAMLEY STREET NEIGHBOURHOOD PLAN

Dear Camden Planning Policy Team,

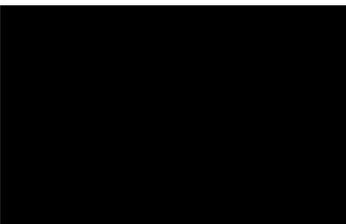
I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to

Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely,

Richard Cotton



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Triggs, Andrew

From: crispino pinheiro [REDACTED]
Sent: 20 September 2019 13:14
To: PlanningPolicy
Subject: Neighbourhood Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir

I work in Camley street ,N1C 4PD and I agree with the Camley Street Neighbourhood Development Plan because I support the building of 100% affordable housing and the retention of the existing local employment

Regards

Crispino Pinheiro

Triggs, Andrew

From: David Royston-lee [REDACTED]
Sent: 17 October 2019 14:54
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

David Royston-Lee
Camley street resident

Triggs, Andrew

From: Lucy Peltz [REDACTED]
Sent: 20 October 2019 18:15
To: PlanningPolicy
Subject: Camley Street neighbourhood plan

Dear Camden planning policy team, I support the Camley Street neighbourhood plan and think it should be adopted. I live in the camley street plan area.

Dr Lucy Peltz, [REDACTED]

Sent from my iPhone

*Please excuse typos etc
Which I blame on Siri*

Triggs, Andrew

From: Edward Lee [REDACTED]
Sent: 14 October 2019 17:27
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely
Edward Lee
[REDACTED]

Triggs, Andrew

From: Frances Stefanopoulos [REDACTED]
Sent: 21 October 2019 15:18
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan area.

Yours sincerely,
Frances Tucker
[REDACTED]

Sent from my iPad

Triggs, Andrew

From: Francesca Raggio [REDACTED]
Sent: 06 October 2019 22:48
To: PlanningPolicy
Subject: Neighbourhood Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

I work at Ted Baker PLC in the area of NW1 0TB and I would like to show my full support and agreement of the Camley Street Neighbourhood Development Plan.
I support the retention of the existing businesses and their varied employment as well as the building of 100% affordable housing.

Kind regards,
Francesca Raggio

Sent from [Mail](#) for Windows 10

Triggs, Andrew

From: Francesco Toschi [REDACTED]
Sent: 20 October 2019 14:00
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and I think it should be adopted.
I live in the Camden Street Plan Area

Francesco Toschi
[REDACTED]

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Triggs, Andrew

From: Dani Sive [REDACTED]
Sent: 20 October 2019 13:36
To: PlanningPolicy
Subject: Camley Street plan

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I work in the Camley Street Plan Area.

Regards

Dani Sive
Headteacher

Frank Barnes School For Deaf Children
4 Wollstonecraft Street, London, N1C 4BT



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Triggs, Andrew

From: Mandip Sahota [REDACTED]
Sent: 25 October 2019 13:26
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan - Representations
Attachments: CSNP Representations - FINAL 191025.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

CAMLEY STREET NEIGHBOURHOOD PLAN - REPRESENTATIONS

Nicholas Taylor + Associates are instructed on behalf of Fraserview Investment (Camley Street) Limited, to provide representations on the submitted version of the Camley Street Neighbourhood Plan (CSNP). Fraserview owns a long leasehold interest in no.106 Camley Street, which lies in the heart of the CSNP area.

Our client seeks to promote the comprehensive redevelopment of the CSNP area, in terms of design, place making and timing of delivery and to maximise the regeneration potential, improving permeability and to create a distinctive urban neighbourhood. It is also sought to create a place that has a distinctive character that supports and promotes the area as a more attractive and accessible area of transition between Kings Cross and Camden Town.

In our client's view, the CSNP area has the potential to be transformed into a vibrant place, clustering a critical mass of activities, with an appropriate and compatible balance of residential and commercial uses. Accordingly, it is important that the CSNP itself is realistic in its aims and that the current freehold and leasehold owners are given an opportunity to secure best value in property terms, for the visions to be realised.

Given our client's interests outlined above, we attach their representations which question the timing of the submission/ examination, the lack of consultation with landowners, and the appropriateness/validity of some of the proposed policies set out in the CSNP.

Please confirm receipt of this submission.

Kind regards,

MANDIP SINGH SAHOTA

PARTNER



NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

46 James Street, London, W1U 1EZ | 020 7636 3961 | www.ntaplanning.co.uk

CAMLEY STREET NEIGHBOURHOOD PLAN - REPRESENTATIONS

Prepared By

NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

WWW.NTAPLANNING.CO.UK
INFO@NTAPLANNING.CO.UK



CONTACTS

Nicholas James

Planner



Mandip Sahota

Partner



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October 2019

Our Ref: 929

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1.0 INTRODUCTION

- 1.1 This statement has been prepared by Nicholas Taylor + Associates instructed on behalf of Fraserview Investment (Camley Street) Limited (**Fraserview**) and provides representations on Fraserview's behalf on the draft Camley Street Neighbourhood Plan (**CSNP**).
- 1.2 The CSNP covers an area to the north of Kings Cross and to the south east of Camden town centre (the **CSNP area**).
- 1.3 Fraserview owns a long leasehold interest in no.106 Camley Street, which lies in the heart of the CSNP area.
- 1.4 The site forms the southern boundary of the Cedar Way Industrial Estate and comprises a single storey cash and carry/warehouse (Use Class B8), with associated forecourt parking. The site is currently leased to Booker Belmont Wholesale Limited on a lease which expires in early 2023
- 1.5 Our client seeks to promote the comprehensive redevelopment of the CSNP area, in terms of design, place making and timing of delivery and to maximise the regeneration potential, improving permeability and to create a distinctive urban neighbourhood. It is also sought to create a place that has a distinctive character that supports and promotes the area as a more attractive and accessible area of transition between Kings Cross and Camden Town.
- 1.6 Fraserview is in ongoing discussions with their adjacent neighbours (which include Camden Council as significant freehold owner) and are discussing a potential masterplan for nos. 104-136 Camley Street (the **sites**) which make up the commercial core of the area. The masterplan vision will seek to maximise the development potential of the sites, providing employment and residential opportunities, together with associated community and environmental planning benefits.
- 1.7 In our client's view, the CSNP area has the potential to be transformed into a vibrant place, clustering a critical mass of activities, with an appropriate and compatible balance of residential and commercial uses. Accordingly, it is important that the CSNP itself is realistic in its aims and that the current freehold and leasehold owners are given an opportunity to secure best value in property terms, for the visions to be realised.
- 1.8 The CSNP area is varied in use, including industrial warehouse /shed buildings, low rise residential, and a natural park sitting alongside the Regents Canal, together with higher density residential in the south towards the Kings Cross regeneration area.
- 1.9 For the CSNP to be incorporated with Camden Policy Documents and be a 'material consideration' when planning applications are assessed for the sites, it has to meet 'Basic Conditions' set out within Town and Country Planning Act, 1990 (Schedule 4B, Paragraph 8, Sub-Section 2). The 'Basic Conditions' are as follows:
- Has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contributes to the achievement of sustainable development;
 - It is in general conformity with the strategic policies of the development plan for the area;
 - It is compatible with human rights requirements; and
 - It is compatible with and does not breach European Union (EU) obligations.
- 1.10 Given our client's interests outlined above, this document will provide representations on the first three bullet points above, and consider whether the CSNP has sufficient regard to national policies; contributes towards achieving sustainable development, and is in general conformity with strategic policies in the development plan for the area, principally Camden Local Plan (2017).

Structure of Statement

1.11 This statement is structured as follows:

- Section 2 provides an overview of the relevant policies in the CSNP.
- Section 3 reviews the relevant CSNP policies and their regard to national policies; their contribution to the achievement of sustainable development; and their conformity or otherwise with the strategic policies of the development plan.
- Section 4 summarises and concludes these representations.

2.0 CAMLEY STREET NEIGHBOURHOOD PLAN - OVERVIEW

- 2.1 The Localism Act 2011 passed new rights to communities including the ability to produce a Neighbourhood Plan.
- 2.2 According to the submission version of the CSNP, the Neighbourhood Forum's objective is to make the neighbourhood an area that's economically vibrant, socially connected and secure: the greenest, safest place to live and work that it could possibly be.
- 2.3 In the introduction to the CSNP, the Forum recognises that the Camley Street area, due to its proximity to King's Cross, is likely to experience future development pressure. It is a key brownfield site. Given this, the CSNP states that the Forum's objective is to ensure the opportunities and potential benefits that new development bring *'are directed towards residents and businesses who already live and work in the area'*. Whilst we generally agree with this objective, it should not prejudice the opportunity that its redevelopment possesses, and the key role that the area will inevitably play in Camden and the wider London area.
- 2.4 In addition, the CSNP wants to ensure that the existing light-industrial businesses are retained, and their activities/operational requirements are integrated into new mixed-use buildings in any future re-planning of the area. Specifically, with regard to the Cedar Way Industrial Estate, the CSNP seeks to secure the retention, replacement and refurbishment of existing light-industrial floorspace and in so doing, deliver new, mixed-use building typologies that allow existing and new employment uses to co-exist (e.g. within the same building, space or plot).
- 2.5 Our client supports the principle of retaining and improving upon existing light industrial floorspace within the CSNP area. However, given the scale of development proposed, and the high-density mixed-use nature of operations, it is not expected that all existing businesses will be retained or their specific operational requirements, e.g. open yard storage or operations, which will not provide best use of land. Retention/ reprovision of existing businesses is considered later in this statement.
- 2.6 Section 4 of the CSNP (*The Vision for Camley Street*) states that the community's vision for the CSNP area is to be achieved *'principally through the redevelopment of the Cedar Way Industrial Estate'* and a number of adjoining parcels of land. Taken as a whole, the intention of the community is that the CSNP 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.
- 2.7 Given our clients' interests, comprising a long leasehold of one of the key sites within the Cedar Way Industrial Estate, they are concerned that they, as well as their neighbouring landowners, were not openly consulted on the CSNP. This is confirmed at paragraphs 3.4 and 4.3 of the CS Neighbourhood Development Plan Consultation Statement which states that *'residents and local businesses'* were consulted, but there is clearly no mention of landowners.
- 2.8 At this juncture our main considerations concern the following proposed policies in the Neighbourhood Plan, which we assess on behalf of Fraserview in the following section;

Employment

Core Objective 1 - Employment

Policy CS EM1 – Employment Floorspace Provision

Policy CS EM2 – Retention of Existing Businesses

3.0 CAMLEY STREET NEIGHBOURHOOD PLAN POLICY - ASSESSMENT

- 3.1 This section reviews relevant policies, as outlined in paragraph 2.7 above, having regard to our client's interests as outlined above.
- 3.2 This section also considers whether the proposed policies meet the basic conditions; whether they have had sufficient regard to national policies; whether the policies contribute towards achieving sustainable development; and whether the policies are in general conformity with strategic policies in the development plan for the area.

OVERVIEW

- 3.3 Having regard to the current Camden Local Plan (2017), paragraphs 2.68 - 2.72 are relevant. Camden Local Plan states (our emphasis) *"the area around Camley Street is undergoing significant change. Central London is extending northwards with the King's Cross Central development and the emergence of the Knowledge Quarter based around King's Cross/Euston and Camden Town is growing as a creative industries hub. In this changing context, **the current employment premises at Camley Street fail to make the most efficient use of land**".*
- 3.4 Paragraph 2.71 of the Local Plan continues *"The Council will produce a Vision/ Planning framework, to ensure that growth and change takes place in an integrated and sustainable way, addresses public realm and connectivity issues, and is underpinned by a clear vision and employment strategy".*
- 3.5 The above passages are acknowledged in the submitted version of the CSNP - that the Council is currently preparing to publish a Supplementary Planning Document (SPD) outlining its aspirations for the wider Camley Street Growth Area later this year – yet the CSNP has been submitted for examination. Our client considers that it is wholly premature for the Forum to have submitted the CSNP for independent examination at this stage, and until Camden Council have progressed the Vision/ Planning framework SPD.
- 3.6 Moreover, paragraph 2.68 of the Local Plan specifically states that *'The east side of Camley Street, between and Agar Grove and Regent's Canal accommodates mainly industrial, storage and distribution uses, within predominantly single storey premises. **Camden owns the freehold of this land, including sites that could be brought forward in the short term, and is currently considering options for its landholdings to facilitate future redevelopment...**'*. Yet, as stated at paragraph 4.1 of the CSNP (again our emphasises), *"the community's vision for the CSNP area is to be achieved principally through the redevelopment of the Cedar Way Industrial Estate and a number of adjoining parcels of land"*.
- 3.7 The Council's own report to Cabinet in July 2019 (regarding redevelopment of 120-136 Camley Street and Units 3-30 Cedar Way) states (at paragraph 3.6) that *"it is challenging to make firm recommendations about the preferred Regeneration Strategy until a masterplan has been progressed, and the phasing opportunities, viability and funding requirements are fully explored. Therefore, the proposed next steps are to procure a professional team to develop and progress the Regeneration Vision... to enable a detailed business case and Regeneration strategy to be reported to Cabinet for further consideration"*.
- 3.8 It is further stated at paragraph 3.8 of the report to Cabinet that *"It is also intended that the Council would engage further with the head leaseholders on neighbouring sites to support collaboration to*

bring forward a wider masterplan". We understand from our discussions with Camden Council that this consultation and collaboration is due to commence imminently.

- 3.9 In light of the fact that;
- a) The Council is currently preparing to publish an SPD outlining its aspirations for the wider Camley Street Growth Area;
 - b) as significant freeholder, the Council is considering options for the redevelopment of its own landholdings; and,
 - c) that the CSNP has not openly consulted with current landowners in the preparation of the current draft ;

Fraserview considers that the submission for examination of the CSNP is premature.

- 3.10 Notwithstanding the above, we take this opportunity to comment on relevant proposed policies below on behalf of Fraserview.

EMPLOYMENT

CSNP Core Objective 1 – Employment

- 3.11 Core Objective 1 states *"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"*.
- 3.12 We raise no principle objections to the core objective.

POLICY CS EM1 – Employment Floorspace Provision

- 3.13 The key objective to this policy states that (again, our emphasis) *"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"*.
- 3.14 Another key objective is to *"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"*.
- 3.15 We examine the above objectives in further detail below, Part of a) of Policy CS EM1 states that the redevelopment of existing employment sites:

- a) *Must ensure that the amount of existing B1(c) light industrial employment floor space and B8 storage and distribution space present on a site is, as a minimum, maintained and preferably increased where feasible;*

- 3.16 We agree with the general intentions of Policy CS EM 1 a) and consider that it aligns with Camden Local Plan policy E2 part c) which states *'the level of employment floorspace is increased or at least maintained;'* when business premises are developed. However, policy E2 of the Local Plan does not state what type of B Class use is required in replacement and in our view, replacement should not be limited to any specific type of B Class use. Therefore, in accordance with Local Plan Policy E2, we consider that any re-provision of business floorspace (whether it be class B1c, B2 or B8) would be policy compliant, and should not be limited to a specific B-class use.
- 3.17 It would also provide greater flexibility in terms of accommodating the best and most appropriate uses in the right locations across the CSNP area. Given that significant parts of the CSNP area will be subject to a masterplan/ SPD, and that large parts are expected to be comprehensively redeveloped, it would be prudent to allow the greatest flexibility in the (re-)siting of industrial/business uses within the CSNP area. It is likely that not all existing industrial sites should re-provide the same or in fact, any industrial use if brought forward as part of a wider vision/masterplan.
- 3.18 Part b) of Policy CS EM1 states that the redevelopment of existing employment sites:
- b) Must ensure that all replacement business and industrial floor space is suitable for meeting the operational needs of existing and other comparable new occupiers;*
- 3.19 Part b) this is broadly in line with the Camden Local Plan. However, at paragraph 5.40 of the Local Plan, it states that (our emphasises) *'The loss of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated that it is possible for the existing business to be relocated to a sustainable location and that this would not cause harm to CAZ functions or Camden's local economy....Redevelopment should retain as far as possible existing businesses that desire to remain on the site, and in particular retain industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy'*.
- 3.20 It is acknowledged that Camden Local Plan policy encourages the retention of existing businesses and industrial land due to the loss of industrial sites across the borough in recent years.
- 3.21 It is further acknowledged that re-provided employment floorspace should be designed flexibly to be able to accommodate a range of business types and sizes, including existing businesses. However, planning decisions should not be personal nor limited to the specific needs of an individual business, particularly if those requirements have the potential to prejudice the wider aspirations for the CSNP area.
- 3.22 As highlighted above, if it can be demonstrated that existing businesses can be relocated to a sustainable location (which may not be within the CSNP area) this would be policy compliant. In accordance with paragraphs 2.68 – 2.72 of the Local Plan, the future development of employment premises at Camley Street should make the most efficient use of land.
- 3.23 Part c) of Policy CS EM1 states that the redevelopment of existing employment sites:
- c) 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;*

- 3.24 Part c) of Policy CS EM1 is considered to align with Camden Local Plan policy E2 part f) which states that when business sites are developed *'the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises,'*
- 3.25 We raise no in-principle objection to part c) of the Policy.
- 3.26 Parts d) and e) of Policy EM1 state that redevelopment of existing employment sites:
- d) *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.*

e) *All other B1 floorspace provision should provide the maximum viable amount of affordable workspace.*
- 3.27 Camden Local Plan does *not* refer to the rent caps payable; policy E2 b) states that the Council will try to *'maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;'*
- 3.28 Whilst this range of terms and conditions would allow for a Greater London rental rate to be considered, it is not a basic requirement and should not be made a constraint against appropriate redevelopment or appropriate future use of sites within the CSNP area.
- 3.29 Having regard to the London Plan (Draft 2019), Policy E3 (affordable workspace) states that in defined circumstances, obligations *may* be used to secure affordable workspace (in the B Use Class) at rent maintained below the market rate for that space such as charities, voluntary and community organisations, creative and artists' workspace, disadvantaged groups, supporting educational outcomes through connections to schools, or start-up and early stage businesses or regeneration.
- 3.30 Whilst affordable rent levels should be encouraged where appropriate, we consider that the CSNP as currently worded goes too far to suggest that *all* new B1c floorspace should be charged at average *Greater London* rental levels at the time of development. This does not provide the opportunity to consider the type and/or quality of the space, which we would expect to be exemplary in the CSNP area. Nor does it allow consideration of the location – Camley Street is a prime, Zone 1 location.
- 3.31 Not all B1c activities are equal, and as highlighted by Local Plan Policy E2 b) there are firms of differing sizes with differing resources. To apply a blanket restriction of rental rates at the time of development would be commercially flawed.
- 3.32 Having regard to Camden Council CPG on *Employment Site and Business Premises (2018)*, the following examples are given as ways in which affordability has been defined on recent schemes in the borough, which we consider to be much more appropriate and promote as part of any future re-wording of the CSNP.
- *20% of the workspace to be provided at 50% of comparable market values*
 - *an element of the floorspace to be offered to an affordable workspace provider (to be approved by the Council) at a peppercorn rent (i.e. a very small or token rent).*
 - *an average of market rents paid by tenants in the area occupying an equivalent type and quality of space. This should relate to average market rates in the relevant sector in particular to light industrial and maker space.*

- 3.33 With regard to part e) of CS EM 1, it seeks that all other B1 floorspace provision should provide the maximum viable amount of affordable workspace.
- 3.34 Camden Council Local Plan policy E2 f) states that business sites that are developed should include ‘*managed affordable workspace where viable*’. The Council seeks to use planning obligations to secure an element of affordable SME workspace from large scale employment developments, typically with a floorspace of 1,000sqm (GIA or gross internal area) or more.
- 3.35 We consider that current practice (in line with Local Plan Policy E2) should continue and sought only on major development sites (i.e. where 1,000m2 of new floorspace is created, not on *all* sites).
- 3.36 Where affordable workspace is to be delivered through a scheme, these should be means tested as part of any planning application to ensure that overly onerous requirements do not stifle or undermine development affordability.

POLICY CS EM2

- 3.37 Policy CS EM2 aims to support the retention of existing businesses. It states (again, our emphasis):

*“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 [extract, right]. 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”.***

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

- 3.38 Policy E2 of the Local Plan states that the Council will encourage the provision of employment premises and sites in the borough. The policy further states that it will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

- 3.39 The emerging London Plan, at policy E2 part b) and E7 part e) also aim to ensure that existing businesses are protected, however 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. Our comments expressed under policy CS EM1, therefore equally apply to Policy CS EM2 (e.g. see Pare 3.20 above).
- 3.40 With regard to rents, the CSNP suggests that all existing businesses within the NP area (that employ Camden resident and support the CAZ) are offered equivalent floorspace and that this offer should be made at *average Greater London light-industrial rental levels*.
- 3.41 In promoting the above, the CSNP relies on Policy E3 (affordable rents) of the Draft London Plan, which states that, in defined circumstances, obligations *may* be used to secure affordable workspace. The policy cites certain situations in which affordable rents may be used, e.g; charities, voluntary and community organisations, creative and artists' workspace, disadvantaged groups, supporting educational outcomes through connections to schools, start-up and early stage businesses and regeneration. The CSNP relies on the latter.
- 3.42 Whilst it is appreciated that the disruption of regeneration may have financial implications on businesses, and this should be reflected on re-provision, the Draft London Plan does not define the rate of affordable rent, as quite rightly, this should be dependent on viability from site to site, and business to business.
- 3.43 The CSNP Forum asserts that a calculation of average light industrial rents across Greater London provides a comparator for Camley Street businesses. The CSNP Forum further suggests that although Camley Street is located within London, it is not a premium site. We wholly disagree with these assertions.
- 3.44 The CSNP area is a Zone 1, premium location with a PTAL of 6a/b (best possible rating) and on the fringe of the Congestion Zone/ULEZ zone. The area is premium today in locational terms, and given the Council's own aspirations for the area, it most certainly will be premium in terms of physical quality in the foreseeable future. We expect rental levels to reflect the location and the quality of the spaces/buildings that will be created.
- 3.45 The CSNP states that current Greater London Average Rental Rates (taken across 22 London Areas) for '*small, industrial sheds*' (taken at January 2019) is £156.61 per sqm. In light of the proposed intensification sought for the CSNP area, and the likely mixed-use, high density, high quality developments that will be accommodated, we are of the view that a comparator describing '*small industrial sheds*' is not at all representative.
- 3.46 Appropriate rent levels, as outlined above (and in the Council SPG) should be based on an average of market rents paid by tenants in the area occupying an equivalent type and quality of space. This should relate to average market rates in the relevant sector.
- 3.47 With specific regard to Frasersview's site, it currently comprises a very large, 4,430m² building, and is let to Booker Wholesalers (**Booker**). Booker (now part of Tesco, following a £3.7 billion merger in 2018) are not the kind of occupier who would be unable to trade at a market rent if relocated within a new scheme and the suggestion that their rent is capped in line with Greater London Average Rental Rates is completely inappropriate. Applying an affordability test would not in their case justify a reduction in the level of rent.

- 3.48 Rents for large units do not trade at a discount to rents on smaller units in the borough. In fact, rents for larger units such as no. 106 Camley Street, are expected to return a premium rent in the open market. This is due to the scarcity of land capable of supporting such large units in the borough - and throughout central London. In summary, the rent restriction posed, at an average of the rents on small industrial sheds in Greater London area, would be inappropriate on two counts:
- a) Geographically, Camden is superior - and this site (comprising the CSNP area) can be considered prime within Camden; and,
 - b) In terms of unit size, there is scarcity value in large units.
- 3.49 Finally, CS EM2 states that existing businesses within the NP area should be offered equivalent replacement space as part of the business and industrial space provision in any redevelopment proposals, while ensuring that business continuity is ensured as far as possible.
- 3.50 We agree that efforts should be made to ensure business continuity, and as far as possible, allow the possibility of existing businesses reoccupying space within the CS area. However, with regard to Camden Council’s report to Cabinet earlier in the year (July 2019) (regarding the proposed future development of 120-136 Camley Street and Units 3-30 Cedar Way), under section 4 it reviews the key impacts/risk and how Camden consider they will be addressed.
- 3.51 More specifically, at paragraph 4.1 of that report, it considers the impact on existing businesses. In the Council’s view, *“it is anticipated that the most viable approach to redevelopment will require the existing business to move off-site prior to construction. Although it would be a number of years before they would need to vacate, this would have an impact on the existing businesses’ continuity. To mitigate the impact of relocation, the Council would develop a business support plan, working with existing businesses to communicate the redevelopment programme and help find alternative accommodation, but acknowledge that this may be outside of the borough. Where appropriate, existing business could be offered the opportunity to return and enter into new leases in the new employment space. Going forward, where possible, the council will consider a local lettings policy for allocation of affordable workspace”*.
- 3.52 We agree and endorse the Council’s rationale with respect to the future redevelopment of the sites within the CSNP area.

4.0 SUMMARY AND CONCLUSIONS

- 4.1 This statement has been prepared by Nicholas Taylor + Associates and provides representations on the submission version of the Camley Street Neighbourhood Plan (CSNP). Nicholas Taylor + Associates act on behalf of Fraserview Investment (Camley Street) Limited (**Fraserview**) which owns a long leasehold interest in no.106 Camley Street.
- 4.2 Fraserview is in ongoing discussions with its adjacent neighbours (which includes Camden Council as freehold owner) regarding the potential masterplan for nos. 104-136 Camley Street, which make up the commercial core of the CSNP area. The vision seeks to maximise the development potential of the sites, providing employment and residential opportunities as well as community and environmental benefits.
- 4.3 The above is referenced at Paragraph 2.71 of the Local Plan, which states that the Council will produce a Vision/ Planning framework, to ensure that growth and change takes place in an integrated and sustainable way and is underpinned by a clear vision and employment strategy.
- 4.4 Moreover, the Local Plan notes that Camden Council currently owns the freehold of a significant portion of the CSNP area (including the Cedar Way Industrial Est.), including sites that could be brought forward in the short term, and is currently considering options for its landholdings to facilitate future redevelopment.
- 4.5 Yet, paragraph 4.1 of the current CSNP, states, *“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”*.
- 4.6 Given it is acknowledged in the CSNP that the Council is currently preparing to publish an SPD outlining its aspirations for the wider Camley Street area later this year, we consider that it premature for the Forum to have submitted the CSNP for examination at this time.
- 4.7 The Council’s own report to Cabinet in July 2019 (regarding redevelopment of their sites) reiterates the above at paragraph 3.6, stating *“it is challenging to make firm recommendations about the preferred Regeneration Strategy until a masterplan has been progressed”*.
- 4.8 In addition, given Fraserview’s interests, they are concerned that they, as well as their neighbouring landowners, were not openly consulted on the preparation of the CSNP, which raises further question on the suitability of the timing of the submission for examination.
- 4.9 Notwithstanding the above, on behalf of Fraserview, we have in this statement reviewed the proposed policies set out in the CSNP. At this juncture we have been principally concerned with the proposed employment policies, notably policies CS EM1 and CS EM2.
- 4.10 Policy CS EM1 sub section b) states that redevelopments in the CSNP area ‘must ensure that all replacement business and industrial floor space is suitable for meeting the operational needs of existing and other comparable new occupiers. However, as supported by paragraph 5.40 of the Local Plan, we are of the view that not *all* existing uses *must* be retained. Redevelopment and future uses must make most efficient use of land, and if it is demonstrated that it is possible for an existing business to be relocated to a sustainable location (and that this would not cause harm to CAZ functions or Camden’s local economy) this would be policy compliant.

- 4.11 Parts d) and e) of CS EM1 and CS EM2 state that all redevelopment must ensure that all new employment uses (and specifically B1(c) light-industrial floor space) are charged at average Greater London rental rates at the time of development, and that all other B1 floorspace provision should provide the maximum viable amount of affordable workspace.
- 4.12 The CSNP refers to current Greater London Average Rental Rates for '*small, industrial sheds*', currently at c£156 per sqm. The CSNP as currently worded goes too far.
- 4.13 Seeking to charge all new floorspace at average *Greater London* rental levels does appropriately reflect the type and quality of spaces that are likely to be created in the CSNP area, nor does reflect its prime, zone 1 location. Furthermore, Camden Local Plan does not specify maximum rents payable, and neither does the London Plan.
- 4.14 With specific regard to Fraserview's site, which comprises a 4,430m² building let to Booker Wholesalers, Booker is not the kind of occupier who would be unable to trade at a market rent if relocated within a new scheme. Furthermore, rents for large units such as no. 106 Camley Street are expected to return a premium rent in the open market. This is due to the scarcity of land capable of supporting such large units in the borough and throughout central London. The rent restrictions posed, are therefore inappropriate and should be applied on a site-by-site basis.
- 4.15 Camden Council's current CPG on Employment Site and Business Premises (2018) provides more appropriate examples of how affordable rents have been approached in recent developments and we consider this more appropriate moving forward in the CSNP.
- 4.16 Finally, it is acknowledged that the redevelopment of any site in the CSNP area should look to retain as far as possible existing businesses that want to remain on the site. However, looking at this practically, any existing business would be expected to move off-site prior to construction works. Where appropriate, existing business should be offered the opportunity to return and enter into new leases in the new employment space on appropriate terms, but this should be considered on a site-by-site basis.
- 4.17 We wish to be notified of the Council's decision on the Examiner's recommendations.



Triggs, Andrew

From: Garry Taylor [REDACTED]
Sent: 24 October 2019 09:34
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs

I am writing to give my support for the Camley Street Neighbourhood Plan and believe this plan ought to be adopted.

I live in the Camley Street Plan Area.

Garry Taylor
[REDACTED]

Triggs, Andrew

From: Gary Baverstock [REDACTED]
Sent: 16 October 2019 14:58
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I am writing to confirm that I believe that the Camley Street Neighbourhood Plan, as submitted to Camden, meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development.

I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

I live in the Camley Street Plan Area (see below) and I am deeply concerned that the needs of the residents and businesses that work there are protected from some big expensive development that only benefits the developers and not the community.

The Camley Street Neighbourhood Plan should be applauded.

Yours sincerely

Gary Baverstock
[REDACTED]

Triggs, Andrew

From: Gavin Innes [REDACTED]
Sent: 26 October 2019 16:40
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan and think it should be adopted. I have lived in the Camley Street Plan area for 10 years (5 years at 133 Weavers Way and 5 years and counting at 85 Barker Drive)

I write to confirm that I believe the Camley Street Neighbourhood Plan as submitted to Camden meets the "basic conditions" requirement as set out in legislation. The aims of the area are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

Gavin Innes



Virus-free. www.avast.com

Triggs, Andrew

From: Gavin Tresidder [REDACTED]
Sent: 28 October 2019 07:19
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live/work in the Camley Street Plan Area.

Gavin Tresidder
[REDACTED]

Sent from [Mail](#) for Windows 10

Triggs, Andrew

From: Glen Gibson [REDACTED]
Sent: 14 October 2019 15:27
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to express my support for the Camley Street Neighbourhood Plan and would like it to be adopted. I live/work in the Camley Street Plan Area.
best wishes

Glen Gibson

Triggs, Andrew

From: Celeste Giusti [REDACTED]
Sent: 25 October 2019 09:37
To: PlanningPolicy
Subject: Mayor of London response to Camley Street Neighbourhood Development Plan
Attachments: Mayor of London response.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam

Please find attached a response from the Mayor on the above Regulation 16 consultation.

Thanks

Celeste

Celeste Giusti

Team Leader – Local Plans
London Plan and Growth Strategies Team
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

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GREATER LONDON AUTHORITY

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

Department: Planning
LDF06/LDD21/CG01
Date: 25 October 2019

By email: planningpolicy@camden.gov.uk

Dear Sir/Madam

Re: Camley Street Neighbourhood Plan - Submission Version Regulation 16

Thank you for consulting the Mayor of London on the Submission version of the Camley Street Neighbourhood Development Plan (CSNDP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Camley Street Neighbourhood Area includes the London Plan and the Camden Local Plan.

Overall, the Mayor considers the Camley Street Neighbourhood Development Plan is in general conformity with the current and emerging London Plans subject to the affordable housing policy fully aligning with the threshold approach in the draft new London Plan. The response below is guidance which should be followed to align the emerging neighbourhood plan more closely with the draft new London Plan.

The Draft New London Plan

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. The Panel Report has been published and the Mayor will publish his Intend to Publish version of the new London Plan within eight weeks. Publication of the final new London Plan is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Camden and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard the Mayor welcomes the draft Neighbourhood Plan's references to the new London Plans.

General

The Mayor welcomes the overall approach to growth and development in the draft CSNDP. In general, he considers that the plan is positively set out. However, there are some areas where policies should align more closely to the draft London Plan.

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.

The extent of the neighbourhood plan area is set out clearly at the very start of the document, and this is welcomed. Overall the Mayor welcomes the Vision and Core Objectives in Section 5 of the draft Plan.

Industrial land

The draft Plan places a strong emphasis on protecting and increasing industrial floorspace. The Mayor strongly supports the CSNDP policies that seek to retain and intensify industrial uses and this is in line with draft new London Plan policy E4. London, including the Central Activities Zone (CAZ) depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands. Industrial land and floorspace provides the capacity for these activities to operate effectively. In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps.

Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released to other uses. This was well in excess of previously established London Plan monitoring benchmarks set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Research for the Greater London Authority (GLA), the London Industrial Land Demand Study 2017 (CAG), indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. This has been recognised in the Panel Report.

Camden is in the 'retain capacity' industrial category as set out in Table 6.2 of the draft new London Plan. Plans should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. Camden is also located in the Central Services Area which means that there should be a focus on the provision of essential services to the (Central Activities Zone) CAZ and in particular, sustainable 'last mile' distribution/logistics, 'just in time' servicing, waste management and recycling and land to support transport functions and therefore B2 and B8 uses should be prioritised in line with draft new London Plan policies E4 and SD4M. The Camley Street Neighbourhood Area is located directly adjacent to the CAZ and therefore is well placed to serve the strategic servicing needs of London's core commercial area.

The Mayor would welcome a masterplan that clearly sets out how industrial capacity will be retained and intensified in line with draft new London Plan policies E4 and E7.

The Mayor would welcome an approach that ensures existing businesses that wish to, can remain in the Neighbourhood Forum Area.

Affordable workspace

The Mayor welcomes the proposal to seek the provision of affordable workspace, in line with draft new London Plan policy E3. The Forum should ensure that the rate set and the land uses this applies to is viable to enable the delivery and intensification of industrial floorspace. B1 floorspace should be clearly defined into B1(a) and B1(c) as they serve a different need and are covered by different policy approaches in the draft new London Plan.

Offices

Several policies in the draft neighbourhood plan refer to class B workspace. As stated above, B1(a) and B1(c) /B2/B8 uses serve a different need. Draft new London Plan policy E1 directs office B1(a) floorspace to the CAZ and town centres. However, given the site's location adjacent to the CAZ, the Mayor believes there is potential to make a case to support office use in the neighbourhood forum area. Any such approach should ensure B1(a) floorspace does not undermine the protection, retention and intensification of industrial floorspace in line with draft new London Plan policies E4, E7 and SD4M. Any office development should be supported by sustainable modes of travel.

Housing

The Mayor welcomes the proactive approach to housing delivery. Subject to the protection of industrial capacity, the CSNDP should set out a clear housing target for the neighbourhood area. Such an approach will contribute to Camden's 10 year housing target of 10,860 homes as set out in draft new London Plan policy H1.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account by the neighbourhood forum. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Camden Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead consider using the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose.

The Mayor strongly welcomes the reference to Agent of Change principle in the supporting text, however to fully protect the ongoing operation of existing businesses and to protect new occupiers, he believes a clear reference to the Agent of Change should be included in the policy itself.

Affordable housing

The Mayor welcomes the draft policy's move towards the Mayor's threshold approach. However, the approach to affordable housing needs to incentivise developers to follow the fast track route by not requiring the submission of viability assessments. In addition, to incentivise early delivery, the draft neighbourhood plan policy should require early and late stage reviews. Given the intricacies of the Mayor's affordable housing policy, he suggests simply referring to his draft new London Plan policy and Affordable Housing and Viability SPG and not including a policy in the neighbourhood plan.

Transport

The Mayor welcomes the draft plan's focus on promoting walking and cycling. He also welcomes the aim to manage industrial traffic, but any approach needs to be tailored to each occupier to ensure the area remains attractive to a wide range of industrial occupiers. Any masterplan should clearly plan for industrial traffic. Given this is an industrial area on the edge of the CAZ, it has the potential to accommodate a consolidation centre itself.

Design

The Mayor welcomes the approach that notes the wider built form and seeks to optimise development in line with draft new London Plan policies D1, D1B and D2.

The policies that require the preservation of historic assets and views are also supported along with the inclusion of the plan of the strategic views which shows the height thresholds and its reference in the draft Tall Buildings policy.

A reference to Agent of change should also be included in proposed policy CS DQ1 to ensure building designs protect new and existing occupants and businesses from pollution and disturbance.

Social infrastructure

The Mayor welcomes the aims of the draft neighbourhood plan to provide social infrastructure. The CSNDP should set out a list of priorities to be provided either on-site by developments or through Community Infrastructure Levy (CIL) receipts.

Green Infrastructure

The Mayor welcomes the requirements to protect and enhance existing open spaces in line with draft new London Plan policies G1 and G4, as well as the inclusion of an open space map.

The Mayor also welcomes the policy to create new green and open spaces as well as the requirement for new development to provide new open spaces and enhance green infrastructure and biodiversity. The draft new London Plan policy G6 seeks a net gain in biodiversity and includes a policy (G5) on urban greening.

Again, the CSNDP should set out a list of green infrastructure and open space priorities to be provided either on-site by developments or through Community Infrastructure Levy (CIL) receipts.

Glossary

The Affordable housing definition should also refer to the Mayor's preferred affordable housing products for London which are based on current funding. These are set out in para 4.7.3 – 4.7.7 of the draft new London Plan.

I hope this can support and inform the Examination of the Camley Street Neighbourhood Development Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Celeste Giusti on 020 7983 4000 or at celeste.giusti@london.gov.uk.

Yours sincerely



Julietta McLoughlin

Chief Planner

Cc: Andrew Dismore, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Lucinda Turner, TfL

Triggs, Andrew

From: helene fawcett [REDACTED]
Sent: 21 October 2019 13:03
To: PlanningPolicy
Cc: christian@amodels.co.uk
Subject: Camley street neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team,

I fully support the Camley Street neighbourhood plan and look forward very hopefully that it will be adopted.

When the independent examiner's comments are available I shall be very interested in them. Our local area would benefit from this kind of development: affordable housing, employment diversity, local facilities.

Yours faithfully, helene

Helene Fawcett
[REDACTED]

Triggs, Andrew

From: Archer, Heather [REDACTED]
Sent: 23 October 2019 11:33
To: PlanningPolicy
Subject: 8587 Camley Street Neighbourhood Plan Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

For the attention of: Planning Policy Team

Consultation: Camley Street Neighbourhood Plan Consultation

Highways England Ref: #8587

Dear Planning Policy Team,

Thank you for your e-mail of 11 September 2019 inviting Highways England to comment on the above consultation and indicating that a response was required by 25 October 2019.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having examined the Camley Street Neighbourhood Plan Consultation documents, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 & 10 and MHCLG NPPF para 109). Accordingly, Highways England does not offer any comments on the consultation at this time.

Thank you again for consulting with Highways England. We look forward to future consultation via our inbox: planningse@highwaysengland.co.uk.

Heather

Heather Archer, Assistant Spatial Planning Manager

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Triggs, Andrew

From: English, David [REDACTED]
Sent: 23 October 2019 11:56
To: PlanningPolicy
Cc: INFO@CamleyStreet.org.uk; Parish, Richard
Subject: Historic England advice on Camley Street Neighbourhood Plan
Attachments: Camley Street NP 231019.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam

Please find attached Historic England's response to the Submission Draft Camley Street Neighbourhood Plan. If you have any questions about our advice please contact me.

Yours sincerely

David

David English MA MSc IHBC
Development Advice Team Leader
Regions Group: London & South East Region
Historic England, 4th Floor, Cannon Bridge House, Dowgate Hill, London, EC4R 2YA
[REDACTED]



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Historic England

Planning Policy Team
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

Our ref: PL00487502

By email: planningpolicy@camden.gov.uk

23rd October 2019

Dear Sir/Madam,

Camley Street Neighbourhood Development Plan (2019 - 2034) Submission version

Thank you for consulting Historic England on the Submission draft of the Camley Street Neighbourhood Plan. The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more proactive role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on neighbourhood plans where the Neighbourhood Forum consider our interest is affected by the plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments in this letter relate to the policies in the draft plan that relate to heritage. This is in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations.

As per our advice letter dated 8th November 2011 (sic – should read 2018), Historic England generally welcomes the proposed neighbourhood plan, which is well laid out and sets out a clear vision for how the Camley Street area can develop. We do not consider it necessary to comment in detail about all of the policies in the draft plan, but would strongly urge the neighbourhood forum (and/or appropriate decision maker) to ensure that the following serious concerns are resolved before this plan progresses further.

Historic England notes the scale of ambition of this neighbourhood plan, which the Forum's website describes in the following terms: "Our submitted plan includes how we will keep the 500 people, predominantly employed in the food sector, working on Camley Street and build up to 1,000 genuinely affordable homes." We also note the work undertaken to illustrate how this ambition can be delivered. This indicates that a number of tall buildings will be required within the neighbourhood forum area to deliver the amount of growth desired. The plan



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helpfully highlights that the area is crossed by two LVMF viewing corridors, which play an important role in managing part of the setting of the Grade I listed St Paul's Cathedral.

While the plan (e.g. core objective 3) is generally less specific about the scale of growth that will be delivered than the website or background documents, the evidence supporting it (https://camleystreetplan.org.uk/wp-content/uploads/2019/07/259-A-REP-PRES-10_GLAxs.pdf) as shown in figure 46 within the plan, provides a striking illustration of how the Forum is encouraging the area to change. Historic England is concerned that there is insufficient evidence to support this approach at present. While it may be the case that the proposed locations for tall buildings (whose heights are unclear) might not block the viewing corridors themselves or the wider setting consultation areas, this approach to development appears to create a high potential for impacts on the views, including the creation of a canyon effect.

In our view this lack of evidence to support the scale of growth and proposed method of delivering it risks the neighbourhood plan not aligning with the NPPF's requirements for neighbourhood plans to not undermine strategic policies, for proportionate evidence to be provided to support plan making, for the conservation of heritage assets in a manner appropriate to their significance, and the need for a positive strategy for the historic environment (see paragraphs 29, 31, 184 and 185). The lack of evidence also risks conflict with the 2016 London Plan (Policy 7.12 D.a. Implementing the London View Management Framework) which states that:

“The management of views containing strategically important landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the strategically important landmark in the foreground, middle ground or background where appropriate.”

Policy HC4 D1 in the post EIP Draft New London Plan (July 2019) is worded to achieve the same affect. As part of the evidence Historic England collected to support the review of the London Plan we reviewed the implementation of the LVMF policies ([London's Image and identity: Revisiting London's Cherished Views](#)). From the photographs contained in that review it is evident that the development at Kings Cross is already having a significant impact on the view of the strategically important landmark, St Paul's Cathedral, in the view from Parliament Hill (2A.1). While the changes to views of St Paul's have previously been carefully managed at Kings Cross, we are concerned that this neighbourhood plan may inadvertently encourage development that would undermine the qualities for which the long standing





Historic England

strategic views policy has been designed to protect. We do not consider that Parts I and J of the Policy CS DQ3 - Proposals for Tall Buildings, are adequate to address this concern.

To ensure that the scale of development proposed in this draft neighbourhood plan would not cause harm to the setting of St Paul's Cathedral, not be contrary to the policies in the London Plan or the requirements of the NPPF, we strongly encourage the forum to provide accurate visual representations that illustrate the impact of this quantum of development on the strategic views crossing the neighbourhood area. This could be by illustrating the suggested master plan that forms part of the evidence base, or through alternative forms of development.

Dependent on the results it may be necessary to suggest an alternative way of delivering growth in this area (alternative massings to the one illustrated) to avoid potentially harmful impacts; to reduce the scale of development proposed in this location to a quantum that can be delivered sustainably; or to remove all references in the plan to the visual material that proposes this approach to growth and the rewording of the policies and supporting paragraphs (notably 5.31.3) in such a way that these sites could be delivered sustainably (i.e. not impact negatively on the views). We would be happy to advise further on both the methodology for developing such evidence, and the results that it produces.

Conclusion

We hope that these comments are helpful and would welcome the opportunity of discussing them with you (or the relevant decision maker) further. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of this plan.

Yours sincerely,



David English

Development Advice Team Leader: London and the South East



cc. Camley Street Neighbourhood Forum INFO@CamleyStreet.org.uk



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Triggs, Andrew

From: Howard Marshall [REDACTED]
Sent: 23 October 2019 10:19
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
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Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan Area.

Howard Marshall
[REDACTED]

Triggs, Andrew

From: Janet Powell [REDACTED]
Sent: 22 October 2019 13:00
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
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Camden Planning Policy Team –

I support the Camley Street Neighbourhood Plan and I think that it should be adopted. I live in the Camley Street Plan Area.

Janet Powell
[REDACTED]

Sent from [Mail](#) for Windows 10

Triggs, Andrew

From: Jenny Parkes [REDACTED]
Sent: 20 October 2019 18:46
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Dear Camden Planning Policy Team,

I am writing to confirm that I support the Camley Street Neighbourhood Plan & think it should definitely be adopted.
I Live in the Camley Street Plan Area [REDACTED]

Kind regards

Jenny Parkes

Triggs, Andrew

From: jill eckersley [REDACTED]
Sent: 21 October 2019 10:16
To: PlanningPolicy
Subject: Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted.

I live and work in the Camley Street Plan area.

Jill Eckersley, [REDACTED]

Triggs, Andrew

From: John Richmond [REDACTED]
Sent: 07 October 2019 16:08
To: PlanningPolicy
Subject: Representation with regard to the Camley Street Neighbourhood Plan (Regulation 16)

Follow Up Flag: Follow up
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Dear Camden Planning Policy Team

I write, as a member and as joint secretary of the Camley Street Neighbourhood Forum, to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

John Richmond
Joint Secretary, Camley Street Neighbourhood Forum

Triggs, Andrew

From: K Olohan [REDACTED]
Sent: 20 October 2019 22:52
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Dear Borough of Camden Planning Team

As an Elm Village resident for over 30 years, I have seen the area change dramatically. I know that further change is inevitable.

With this in mind I am writing to support the Camley Street Neighbourhood Plan.

I believe the aims of the Plan are in line with Camden and the GLA's policies for housing and maintenance of local employment in London. I feel it answers the need for sustainable and environmentally responsible development.

I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations. I would be willing to participate in a public hearing should the examiner decide to hold one.

Best regards

Keith Olohan
[REDACTED]

Triggs, Andrew

From: Thomas, Andy
Sent: 24 October 2019 22:06
To: PlanningPolicy
Cc: Olomofe, Martin; Triggs, Andrew
Subject: Camley Street Neighbourhood Plan - representations on behalf of Camden Council as landowner
Attachments: Camley Street Neighbourhood Plan - Final reps 2019 10 24.docx
Follow Up Flag: Follow up
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Dear Planning Policy Team

Please find attached representations on the Draft Camley Street Neighbourhood Development Plan and associated documents from the Head of Asset Strategy and Valuation, on behalf of the Council as landowner, prepared by our planning consultant Turley

I confirm the Council as landowner would wish to be represented at a public hearing if one is held, and to receive notification of the Local Planning Authority's decision following the examination

Kind regards

Andy Thomas BSc MRICS
Senior Asset Strategy and Valuation Surveyor
Development
Supporting Communities
London Borough of Camden


Web: camden.gov.uk

5 Pancras Square
London N1C 4AG



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Camley Street Neighbourhood Plan

Representations on behalf of London Borough
of Camden, Asset Strategy and Valuations

October 2019

Turley

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Client

London Borough of Camden, Asset Strategy and Valuations

Our reference

LONL3035

Oct 2019

1. Introduction

- 1.1 These representations are submitted on behalf of the London Borough of Camden Asset Strategy and Valuation Team (LBC ASV) representing the Council as landowner in relation to the Camley Street Neighbourhood Development Plan (2019 – 2034) Submission Version (July 2019).
- 1.2 LBC ASV submitted representations previously, in relation to the Draft Camley Street Neighbourhood Development Plan (November 2018).
- 1.3 The Council has substantial land ownership interests within the area covered by the draft Neighbourhood Plan, including at 120-136 Camley Street and 3-30 Cedar Way, the Dennis Geffen Annexe, Coroners Court, Jubilee Waterside Centre, Camden Garden Centre, plus freehold interests in a number of other sites (some of which have been sold on long leases) and parts of the Elm Village residential estate.
- 1.4 LBC ASV is particularly interested in ensuring that the Neighbourhood Plan will facilitate appropriate redevelopment of its sites and will not introduce policy restrictions or requirements that would impact on viability, delay or reduce the Councils ability to deliver more homes, enhanced employment space and community benefits and which would fail to meet the Basic Conditions tests applying to Neighbourhood Plans.
- 1.5 The council, as a whole, also has a development programme called the Community Investment Programme (CIP), which seeks to build new housing in different tenures, renew local schools and other social infrastructure, and make more efficient use of Camden’s valuable land. The CIP also helps generate capital receipts for reinvestment in council homes and public facilities. Camden, through its CIP is currently considering options in relation to its sites within Camley Street.
- 1.6 The Neighbourhood Plan is being brought forward in the context of the adopted Local Plan, the adopted and emerging London Plan, an emerging Supplementary Planning Document for the Camley Street area and also in the context of national policy and guidance. The Local Plan sets out a range of adopted policy in relation to employment uses, housing and site optimisation and sets out a specific vision for growth within the Camley Street area.
- 1.7 As set out in the Local Plan:

‘The area around Camley Street is undergoing significant change. Central London is extending northwards with the King’s Cross Central development and the emergence of the Knowledge Quarter based around King’s Cross/Euston and Camden Town is growing as a creative industries hub. In this changing context, the current employment premises at Camley Street fail to make the most efficient use of land....’
- 1.8 Key emerging priorities for the area, set out in the Local Plan (and to be delivered through the CIP), include:

- creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town;

- enhanced connectivity and public realm, with more active overlooking of the street at different times of the day;

- creating new public spaces and greening of the street environment; and

- making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space.

- 1.9 Two particular sites within the area have seen planning for the delivery of CIP advance furthest, namely 120-136 Camley Street and Units 3-30 Cedar Way. These sites contain a range of light industrial and storage units comprising approximately 8,000m² gross internal area (GIA). They currently contain a wide range of businesses, food processing and distribution, car repairs, plumbers' merchants, designer/makers, and Council-related facilities.
- 1.10 On 16 October 2019, the Council's Cabinet agreed a strategy for delivering its regeneration vision at the two sites *'to deliver new homes, including genuinely affordable housing, an increase in employment space, new open space and generate income to help fund council services and contribute to the delivery of affordable housing elsewhere in the borough'* (SC/2019/50). Following approval of the report the Council is now developing a masterplan and development brief for the sites and aims to deliver ambitious mixed-use redevelopment by making the most efficient possible use of land. The agreed objectives for the two sites include building the first ever homes on the two sites including genuinely affordable homes, many more jobs, training and skills opportunities for local people, a significant increase in employment space, a greener environment, new public spaces, improved streets and a new neighbourhood to help fulfil the Council's Camden 2025 shared community ambitions for the borough to be safe, strong and open. The employment uses could potentially link to the nearby knowledge institutions and companies based around King's Cross and also with the Base KX hub and move-on space for SMEs at 103 and 102 Camley Street.
- 1.11 The council's strategy envisages that opportunities for a phased scheme will be explored, however current business occupiers of the two principal sites, which represent an inefficient use of the limited land area, may have to move off-site to alternative premises, with council support, prior to construction, with the potential to return where possible. A new employment hub will be delivered of flexible light industrial units suitable for SMEs working in the Knowledge Quarter, other growth sectors, workshops, makers and other industries, and the current businesses can move back where appropriate to new premises more efficiently arranged. It will also be essential to comply with the Mayor of London's policies on retention of industrial space.
- 1.12 Within this context, these representations consider:

- Compliance with the Basic Condition Tests – in particular the requirement for general conformity with strategic policy, as set out in paragraph 074 of the national Planning Practice Guidance.
- The potential impact of the proposed policies on the delivery of development within the Neighbourhood Plan area.
- A review of how the revised plan has been amended to respond to LBC consultation comments on the previous version.
- The justification and evidence base underpinning the Neighbourhood Plan.

1.13 Overall, whilst many of the principles of the draft Neighbourhood Plan are supported, and the Council will be working with the community, there are a significant number of policy requirements that would conflict with higher tier policy and undermine delivery of appropriate redevelopment schemes that would optimise the use of finite land resources within LB Camden. Evidence to justify these aspects of the plan, as well as appropriate testing of viability impacts is insufficient to demonstrate that the Neighbourhood Plan would not have these adverse effects. The Neighbourhood Plan as a whole would not meet the Basic Conditions tests on this basis.

2. Representations

Strategic policy

Local Plan

- 2.1 The Council, in the Local Plan, sets out an overall approach to promote the most efficient use of land and buildings by supporting development that makes the best use of sites and resisting development that makes inefficient use of Camden's limited land. Part of this approach is underpinned by delivery on council-owned sites through the CIP.
- 2.2 The Council also supports economic growth and, in particular, is focused on new and emerging growth sectors and clusters of activity within the borough, including in relation to health, education, professional and technical services, creative and cultural businesses and science. This includes the Knowledge Quarter and Med City. Of critical importance is to ensure sufficient flexibility to respond to changing economic circumstances over the plan period and beyond.
- 2.3 Policies GG1 and E1 of the Local Plan are particularly relevant to these points.
- 2.4 In addition, housing is the priority land use and Local Plan policy H1 refers to the need to maximise housing supply.
- 2.5 Key emerging priorities for the Camley Street area, set out in the Local Plan (and to be delivered through the CIP), include:
- *creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town;*
 - *enhanced connectivity and public realm, with more active overlooking of the street at different times of the day;*
 - *creating new public spaces and greening of the street environment; and*
 - *making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space.*

National Planning Policy Framework

- 2.6 Paragraph 11 notes that '*...plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*'.
- 2.7 Paragraph 13 notes that '*The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.*'

- 2.8 Paragraph 29 notes that *'Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.'*
- 2.9 Paragraph 81 notes that planning policies should *'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...'* and *'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices...and to enable a rapid response to changes in economic circumstances.'*

Overriding issues

- 2.10 We consider below those aspects of specific draft policies which we consider to be problematic. Overall, these specific considerations raise a number of overriding concerns, as follows, which lead us to conclude that the Basic Conditions are not met by the Neighbourhood Plan, as drafted:
- There are a wide range of policy requirements which, taken together, would undermine the deliverability of the Development Plan. We do not consider the evidence base submitted with the draft Plan to robustly demonstrate that there would not be adverse impacts.
 - The draft Plan, as whole, and in relation to certain specific policies referred to below, would undermine the strategic policy objective of optimising the development potential of finite sites within the London Borough of Camden.
 - The primacy given to B1(c) and B8 uses results in a plan which undermines provisions in the Local Plan regarding flexibility; developments should be designed in order to be suitable and adaptable for a range of uses (including B1(c) and B8) in order to protect against obsolescence as a result of future social and economic changes. Furthermore, the evidence to support the Neighbourhood Forum's position that the existing commercial uses are of strategic importance is not robust.
 - The Neighbourhood Plan sets out protection of specific operators and occupiers and, in doing so, crosses over from land-use policy to the protection of private land interests.
 - The draft plan seeks to introduce controls on open-market commercial rents, which goes beyond the remit of the planning system; comparisons to affordable housing are not directly relevant.
 - The draft plan does not reflect the priority given to residential uses, which is a strategic policy set out within the Local Plan, whilst at the same time introducing an extension to Local Plan policy H2 to this part of Camden, without testing the potential conflict between land use policies on B-uses. A more considered and comprehensive approach is required.
 - The draft plan does not take a strategic or area-wide approach to matters such as the provision of open space or social and community infrastructure; as written, all requirements appear to apply to all sites

- Related to this, the plan does not facilitate the delivery of individual sites by setting out an understanding as to how each site could be delivered in isolation but contribute to an overall vision for the area; this would therefore lead either to an unrealistic expectation of comprehensive development of the entire Neighbourhood Plan area at the same time (so that strategic land use decisions can be made) or would result in each site being saddled with policy requirements which could replicate the provision of the same mix of land uses, infrastructure requirements and so forth on each individual land parcel. The key diagrams, such as Figure 45, can only be illustrative and the individual policies must be worded to allow site-specific assessments in relation to individual proposals.
- A number of policies, or provisions within policies, repeat Local Plan policy but often inaccurately and/or incompletely.
- The draft plan contains a number of terms which are relevant to the application of the draft policies but which are either not defined or are poorly defined, which would make application of the policy difficult on a practical level i.e. in decision-making.
- The evidence base to support the plan, which constitutes the 2015 evidence base document and the Aecom viability study, is limited, flawed and not robust in demonstrating a justification for and the deliverability of a number of key policy requirements proposed in the draft plan.

Response to specific policies

Employment

Policies CS EM1 and CS EM2

- 2.11 Flexibility is required for a site-specific assessment and for a case to be made for the greater economic and/or wider planning benefits of an alternative mix of uses and alternative occupiers. These policies in effect prevent this and therefore fundamentally conflict with upper tiers of policy and established planning practice.
- 2.12 Stipulation of rental levels is unacceptable in principle and, furthermore, the basis of average Greater London rents is not justified in this location.
- 2.13 The requirement for '*maximum*' viable level of affordable workspace provision goes beyond Local Plan requirements is unjustified given the paucity of the evidence base and conflicts with other Neighbourhood Plan objectives.
- 2.14 Protection of specific, named, existing businesses is unacceptable in principle; the planning system does not cater to private land interests. As with other aspects of the draft Neighbourhood Plan, previous representations on this from stakeholders have seemingly been ignored.
- 2.15 New floorspace should be flexibly designed to be suitable for a range of operators and to allow flexibility to respond to changing future circumstances, including changing economic circumstances. The Neighbourhood Plan as drafted would prevent this and,

in contrast there is a focus on the requirements of some of the current private businesses in the Neighbourhood Plan area, which is unacceptable in principle.

- 2.16 Balancing against other policy priorities, including the provision of housing and the support in the Local Plan for existing and emerging economic sectors, should also be set out.

Comparison to Development Plan

Local Plan

- 2.17 Policy E1 safeguards existing employment premises, including industrial and warehousing, where suitable and viable for continued use; it also supports intensification of employment sites where additional employment benefits would be provided. Similarly, Policy E2 allows for the redevelopment of employment premises in certain circumstances, where it is demonstrated that the possibility of building for similar or alternative type and size of business use has been fully explored over an appropriate period of time i.e. the Local Plan allows for a case to be made, whereas it would appear that the Neighbourhood Plan does not.
- 2.18 Supporting text paragraph 5.37 (of the Local Plan) sets out some factors in decision-making, with regards to loss or redevelopment of employment space. The Neighbourhood Plan does not properly take account of these issues.
- 2.19 The Local Plan does not protect specific existing businesses nor necessarily protect the existing mix and quantum of use class. Policy E2 does require the retention of existing businesses on site and makes particular reference to industry, light industry, warehousing, logistics, where they support the local economy and the functions of the CAZ; however it also sets out tests, such as whether premises or sites are suitable for continued business use, consideration of the possibility of redeveloping for an alternative type and size of business use and sets out how redevelopment to provide higher density uses will be assessed.
- 2.20 Policy E2 also refers to other priority uses, including housing, which are relevant considerations in decision-making.
- 2.21 The provision of a viable element of SME and/or affordable workspace is not the same as a requirement for the maximum viable amount to be delivered; this is an additional and more onerous requirement which would be introduced through the Neighbourhood Plan as drafted. The limited nature of the evidence base means this policy objective is not justified as appropriate or deliverable.
- 2.22 Policy G1 promotes the efficient use of land, sets out that the council will resist inefficient development of finite land resources and sets out the need to support a mix of uses to meet objectively assessed needs for new homes, new office space and new retail space. Policy G1 (d) notes that the most efficient use of land is enabled by *'supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan'*. The Neighbourhood Plan as drafted fails to conform to this

strategic policy and instead prioritises the interests of existing private businesses over the efficient use of land.

- 2.23 The Local Plan identifies one emerging priority for Camley Street as *'making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space'* (para 2.72). *'The current employment premises at Camley Street fail to make the most efficient use of land'* (para 2.69).

London Plan

- 2.24 It is notable that the Camley Street area is not subject to any designations for employment land under the London Plan
- 2.25 Whilst Camden is, as a borough, allocated for 'retain capacity' this is also subject to the provisions of policy E4, which include:
- Taking into account strategic and local employment land reviews and industrial land audits
 - The potential for intensification, co-location and substitution (under policy E7)
- 2.26 Policy E4 C in particular notes that there should be no net loss of industrial floorspace capacity in SIL and LSIS land; contrary to comments in the Tibbalds consultation report, draft policy E4 does not expect retention of all designated and non-designated industrial sites in Camden.
- 2.27 With regards to the 'retain' category, this sets out that there should be *'no net loss across designated SIL and LSIS'*. This does not relate to undesignated sites.
- 2.28 Policy E7 supports mixed-use redevelopment of non-designated industrial sites, subject to conditions, such as (3) where *'industrial, storage or distribution floorspace is provided as part of mixed-use intensification'*.
- 2.29 E2 B requires re-provision of *'an equivalent amount of B Use Class business space...appropriate in terms of type, use and size, incorporating existing businesses where possible, and include affordable workspace where appropriate'*
- 2.30 The Neighbourhood Plan seeks to protect existing uses and occupiers in a way which is more restrictive than either the Local Plan or the London Plan.

Community and Social Needs

Policy CS CSN1

- 2.31 Terms used in this policy need to be defined, including *'community facilities'*, *'social infrastructure'* and *'community asset'*; references in the policy and supporting text include a very wide range of matters, some of which may be considered community facilities, some of which are clearly commercial premises (including retailers) and some of which are types of infrastructure, including transport infrastructure. The policy is not operable given it is intended to relate to such a wide variety of poorly-defined land uses and activities.

- 2.32 The starting point of on-site community facilities for all developments is unrealistic and there is no reference to any supporting evidence of need or viability.
- 2.33 The requirement for community facilities from developer contributions to be in relation to social infrastructure within the Neighbourhood Forum boundary is very limited.
- 2.34 The requirements of this policy would also need to be assessed on balance, with other policy priorities, including those within the draft Neighbourhood Plan, including with regards to requirements for on-site employment space and housing.
- 2.35 The evidence base underpinning the need for the proposed facilities and infrastructure is not robust, as set out in section 3, below.

Comparison to Development Plan

Local Plan Policy

- 2.36 Policy C2 does not require on-site provision of community facilities on all major proposals, which the Neighbourhood Plan policy does seek to do. It refers to planning obligations to secure new and improved community facilities and the use of CIL.
- 2.37 The Local Plan defines community facilities in paragraph 4.12. Social infrastructure should be clearly defined, in accordance with Local Plan para. 4.21; it cannot include food and drink retail. There needs to be a distinction between transport infrastructure and community facilities.
- 2.38 Evidence is required for any policy requirements beyond what the Local Plan requires, including with regards to viability. The need for facilities should be assessed on a site-specific basis, including via the Health Impact Assessment required by the Local Plan.
London Plan

Housing

Policy CS HO1

- 2.39 The policy is not appropriate for the reasons set out below.
- 2.40 The policy sets an affordable housing approach and approach to affordable housing mix which partly reflects but also partly contradicts and is not wholly consistent with the Local Plan. The Local Plan sets a 50% target, not a 35% target and does not set an aspirational 100% target.
- 2.41 The proposed alternative approach to housing mix and housing tenure lacks a robust evidence base, both in terms of need and viability. London Affordable Rent and London Living Rent are specific products with specific viability implications which have not been tested in the viability evidence (refer to section 3, below). The requirement for four-bedroom homes is a lower priority in the Local Plan (for social-rented housing) than two bedroom and three bedroom homes and therefore this mix contradicts the Local Plan.

Policy CS HO2

- 2.42 The requirement for 50% of floorspace to be residential replicates policy H2 of the Local Plan; however, policy H2 only applies to schemes in the Central London Area and identified town centres, which involve more than 200 sq.m of additional floorspace.
- 2.43 Whilst the council is supportive of additional residential, indeed the optimisation of residential as part of mixed-use development within the Camley Street area, the combination of a requirement for 50% housing, together with the requirements of the employment space policies of the Neighbourhood Plan, could present unrealistic requirements, particularly in relation to smaller schemes and given that the economics of development outside of the Central London Area and town centres differs from other parts of the borough; hence the distinction in Local Plan policy H2.

Comparison to Development Plan

Local Plan

- 2.44 Policy H4 sets a 50% affordable housing target, for schemes with capacity for 25 or more homes and makes no reference to a 35% target, although the draft London Plan sets out a ‘threshold’ approach based on 35%, beyond which viability assessments are not required.
- 2.45 Policy H4 also sets out a ‘sliding scale’ in relation to schemes delivering 25 or less homes including provision for payment-in-lieu.
- 2.46 Policy H4 also sets out criteria (j.-p.) to assess whether affordable housing provision should be sought.
- 2.47 Policy H4 sets out a tenure split of 60% social-affordable rented and 40% intermediate housing, whereas the draft Neighbourhood Plan policy refers to London Affordable Rent and London Living Rent tenures, which is unnecessarily restrictive and could have viability implications which do not appear to have been tested.
- 2.48 Policy H6 refers to housing mix and established a borough-wide evidence-based approach, which provides for ‘a variety of housing...overall across development in the borough’ and seeks ‘a diverse range of housing products in the market and affordable sectors’, including ‘a range of dwelling sizes’.
- 2.49 Policy H7 states that the council will ‘aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities, ...including a mix of large and small homes and contribution to the dwelling priorities table’ (below):

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Policy CS HO3

- 2.50 The moratorium proposed on so-called 'mono-block' student schemes runs contrary to the development model for the overwhelming majority of student accommodation schemes and is tantamount to a ban on student housing in the area. The policy is more restrictive than existing strategic policies and this fails to meet the Basic Conditions test.
- 2.51 Similarly, the requirement of 90% of residential to be C3 is a severe restriction. It is also unclear how this would be assessed on a site-by-site basis and whether it would be a matter of 'first come, first served', which is not a sound basis for land use planning.
- 2.52 The requirement for an element of affordable student accommodation goes beyond Local Plan H9.

Comparison to Development Plan

Local Plan

- 2.53 Local Plan policy H9 states that '*The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden...*'. Policy H9 supports new student accommodation to meet or exceed a target of 160 places per year, subject to policy tests which do not include a restriction to a set percentage of units (compared to C3).
- 2.54 Local Plan policy H9 only requires affordable student accommodation where the accommodation is not tied to an institution.

London Plan

- 2.55 It is noted that the draft London Plan contains provisions with regards to affordable student accommodation; however, this is not yet adopted policy and the Examination process has not been concluded.

Design

Policy CS DQ1

- 2.56 This policy is very wide ranging, including general and specific points, some relating to design, some relating to land use and a range of other matters.
- 2.57 The requirement to prevent overshadowing is potentially extremely onerous – instead reference should be made to the widely adopted Building Research Establishment tests, with regards to overshadowing, daylight and sunlight.
- 2.58 The introduction of townscape views and a new test to '*protect and enhance*' may have a significant impact on development in the area and the effects of this have not been tested, nor is it clear how this policy provision would be assessed. It is not clear why these views have been selected nor what is important within these views.
- 2.59 The retention of '*informal green and open spaces*' is unclear in intent but could have a restrictive impact on development prospects, particularly combined with the need to explore the introduction of new integrated open and green spaces.

Policy CS DQ2

- 2.60 Policy CS DQ2 appears to have significant cross-over with transport policies in the Neighbourhood Plan and indeed the Local Plan. This policy seems unnecessary and inappropriate.
- 2.61 The key diagram (Figure 45) should be noted as being indicative/advisory and clearly cannot set out specific routes which individual developments would be required to deliver. A site-specific approach will be necessary to translate the aspirations set out in Figure 45.
- 2.62 The requirement for new pocket parks is unjustified given that green space provision in the area is good; however, an aspiration to deliver more green spaces, subject to evidence of need and site-specific feasibility, would be more appropriate.
- 2.63 The area of '*mixed-use redevelopment*' and '*existing development*' would suggest that other parts of the Neighbourhood Plan area could not come forward for redevelopment, or at least for mixed-use redevelopment, which is not necessarily the case or appropriate.

Policy CS DQ3

- 2.64 It is very unclear what the first paragraph within the policy means, in terms of height and massing within the Neighbourhood Plan area, nor what is meant by the '*hierarchy of taller buildings in the area*'. Does the plan support taller buildings or not, and what is considered to constitute a taller building?
- 2.65 The justification for limiting the potential for tall buildings to the '*mixed-use area*' is not set out. The London Panoramas 2A.1 and 3A.1 will be assessed in accordance with adopted policy in any case. The relevance of the proposal local views is unclear.
- 2.66 It is very unclear how new developments would be required to '*create new and enhance existing views, vistas and sight lines*'. What is the implication for decision-making?
- 2.67 The requirement to '*contribute positively to the setting of heritage assets*' would introduce a new and different test to that which exists in statute and within the existing Development Plan documents, NPPF and PPG. This is not appropriate

Comparison to Development Plan

Local Plan policy

- 2.68 The Local Plan policies on design and heritage deal more than adequately with these matters. The justification for a specific approach to height and to local views could be reasonably set out in a Neighbourhood Plan but requires analysis and justification, both in terms of the townscape merits of the approach, as well as the potential impact on development.
- 2.69 With regards to locally important views, paragraph 7.29 of the Local Plan notes that the Council will seek to protect locally important views (in addition to the London View Management Framework) and sets out a list of potential '*locally important views that contribute to the interest and character of the borough*' which include:

- *'views of and from large public parks and open spaces, such as Hampstead Heath, Kenwood Estate, Primrose Hill and Regent's Park, including panoramic views, as well as views of London Squares and historic parks and gardens;*
- *views relating to Regent's Canal;*
- *views into and from conservation areas;*
- *views of listed and landmark buildings, monuments and statutes (for example, Centrepoint, St Stephen's, Rosslyn Hill and St George's, Bloomsbury).'*

2.70 The view along the Regent's Canal is therefore potentially a valid local view point; however, justification should be provided as to the viewpoint chosen and it needs to be clear how effects on that view would be assessed in any planning decision. This also applies to the other two views identified in the draft plan.

Sustainable transport

Policies CS TR1 and TR2

- 2.71 Policy CS TR1 replicates aspects of the Local Plan and where it does diverge from the Local Plan, it do so without clarity and without a robust evidence base. The requirement for an off-street loading bay for all mixed-use developments (of any scale) is unreasonable and unnecessary. This policy should be significantly revised or removed
- 2.72 Policy CS TR2 similarly addresses issues already addressed within the Local Plan, which is already pro-walking and cycling. It is unclear how the aspirations within policy CS TR2 will be delivered, and what the implications of the policy are for individual planning decisions. Some aspects of the policy also are overly prescriptive without clear justification, such as the aspiration to increase footway width where possible – this should be required where feasible and/or viable and where this would be required in highways terms. Again, whilst the policy does pick up some locally specific points, albeit without any clear justification, the Local Plan transport policies are in place to address highways impacts and walking and cycling infrastructure.
- 2.73 Aspects of this policy may be more appropriately set out as a separate list in relation to priorities for the spend of locally derived CIL and Section 106 contributions.

Local Plan

- 2.74 Local Plan policies T1-T4, in conjunction with the London Plan transport policies, adequately and fully address issues relating to sustainable transport.

Green Infrastructure

Policy CS GI1

- 2.75 Whilst the provision of new or improved open spaces is supported in principle by the council, there is a lack of logical evidence base for this, given that the limited evidence base suggests access to green and open space is good.

- 2.76 The term '*greening of the area*' should be given a clearer definition and '*existing open areas of townscape, amenity or ecological value*' should be defined, identified and robustly justified.
- 2.77 The objective to simply incorporate existing open space into new development stymies the objectives of increasing density through intensification of the area and redistribution of uses. Moreover, it prevents redesign, upgrading and modernisation of such spaces that may be enabled by development in order to simply preserve what exists at the time the Plan is adopted.
- 2.78 Section 106 requirements should be quantified and considered in the context of LBC planning obligations policies and the Community Infrastructure Levy.
- 2.79 Tree protection, green corridors and the protection of gardens is addressed fully in the Local Plan and there is no need to replicate or vary these higher tier policy provisions in the Neighbourhood Plan.
- 2.80 Part (f) of the policy clearly sets out a restrictive approach to development, in setting out terms by which development would be refused. The definition of a '*direct or indirect harmful impact*' needs to be set out and whilst a number of specific spaces are listed, the inclusion of '*not limited to*' is unhelpful – if there are other spaces the Neighbourhood Forum wishes to protect through policy then these should be identified. The Plan is fundamentally unclear what sites, open spaces, infrastructure or structures are covered by this policy.
- 2.81 Moreover, refusing development that would merely have an indirect harmful impact on a heritage asset or natural feature even when this was substantially outweighed by the benefits of the proposal is contrary to established planning policy and practice concerning the planning balance and delivery of sustainable development.

Policy CS G12

- 2.82 The requirement for all new development to provide new green and open spaces lacks any justification, particularly given that the limited evidence base suggests there are sufficient open spaces within the area. Whilst some new open space provision may be appropriate and would align with the Council's aspirations for the area, this should be planned strategically across the area and there should not be a requirement at a site-specific level.
- 2.83 Minor proposals, and smaller scale majors, cannot reasonably be expected to provide on-site open space, nor would this be the best outcome given that such spaces would be likely to be of limited benefit compared to a smaller number of larger spaces. There may also be scheme delivering other social benefits, such as new public sector education or health developments, for which on-site open space would be a threat to delivery.
- 2.84 The definition of '*appropriate*' new green and open space is unclear.
- 2.85 The '*links*' that are expected to be provided to green routes outside the NP area are not defined, for example in terms of what form they should take, how they should be delivered, what transport modes should utilise the links and where they should be

located. The policy should give strategic direction and allow for links to be delivered through a coordinated approach, rather than for each site to be responsible for policy delivery in isolation.

Policy CS G13

- 2.86 It is not realistic to expect net biodiversity gains, including green roofs and swales within all new development proposals as this includes very minor proposals such as small extensions, changes of use etc. Many such proposals cannot realistically and viably deliver net biodiversity gains and to expect them to do so is disproportionate.
- 2.87 No explanation is given of why certain roads, namely Camley Street, Barker Drive, Rosendale Way, Weavers Way and south of Cedar Way are identified for particular attention in terms of provision of green roofs and swales.
- 2.88 It is unclear how the policy provisions regarding the 'blue network' would be assessed on a site-by-site basis.
- 2.89 It is unnecessary to create a policy seeking maximisation of new tree planting when the Local Plan already has a more detailed policy protecting existing trees and seeking the planting of new ones.
- 2.90 The justification for and practicality of '*provision of sustainable living walls at key points to act as biodiverse landmark features*' is not established, nor is it clear what mechanisms would be in place to deliver these.

Comparison to Development Plan

Local Plan

- 2.91 A far clearer and more detailed policy on biodiversity is available in the Local Plan through Policy A3. The Neighbourhood Plan policy misses key issues such as dealing with invasive species, securing management plans, and protecting nature conservation sites, so it will in any case be necessary to rely on the Local Plan policy.
- 2.92 The Local Plan Policy CC2 Adapting to climate change already provides a fuller set of requirements in this area.

Sum total of policy requirements

- 2.93 As worded, on any given site, the proposed policies would or could introduce the following requirements:
- Absolute requirement for the retention of B1(c) and B8 floorspace, with preference to increase and protection of businesses specifically named within the draft plan.
 - Replacement floorspace designed for the existing operator, or a comparable operator (which could be taken to mean the same or very similar business type and model).
 - Consideration of SME B use class space, where feasible.

- Capped rents on all B1(c) space, to a Greater London Average in spite of the relatively central location of the area.
- Maximum viable amount of B1 floorspace, management by a specialist provider identified prior to implementation.
- Measures for business continuity during redevelopment, as far as possible.
- Provision of on-site community facilities and/or off-site contributions to social infrastructure, is poorly and extremely broadly defined within the draft plan. Refusal of any and all applications causing loss or harm to identified community assets (though it is not clear what these are).
- Maximum viable quantum of affordable housing and no less than 35% (and 50% on public land), with an aspirational 100% target, at London Affordable Rent and London Living Rent tenures.
- The provision of three and four bedroom homes.
- 50% of all additional floorspace as residential, where there is a net uplift of 1,000 sq.m or more.
- Affordable student accommodation in relation to any student accommodation scheme, which must only form part of a mixed-use development and with links explored to on-site B uses.
- Provision of off-street loading bays, segregation of industrial traffic where possible, implementation of 'last mile' bicycle and electric vehicle delivery and use of rail and/or electric freight (with rapid charging) and Regent's Canal, where possible.
- Direct provision of public realm and highways improvements, where appropriate.
- Connections to cycling and walking route and to '*key areas and assets*' and improvements to existing infrastructure, including through the creation of '*leisure spaces*', investment in Legible London initiatives.
- The retention of formal and informal green and open spaces, together with enhancements. Financial contributions to open space, incorporation of existing (poorly defined) open areas into the design of redevelopment schemes and improvement to green corridors.
- On-site provision of new green/open space and play space, including private and public amenity spaces; creating green links and a pocket park and greening the area including the Regent's Canal tow path.
- Delivering biodiversity net gain through a range of prescriptive measures.
- Delivering innovative building typologies to secure industrial use as part of a mix of uses.

- Protecting and enhancing proposed local views, with any resultant impact that this may have on height, massing and design.
- Compliance with all other relevant Development Plan policies, in the Local Plan and London Plan, and material considerations, including SPDs, GLA SPGs, the NPPF and the PPG.

2.94 On the basis of the above, both individually and cumulatively, we consider that the draft Neighbourhood Plan would be more onerous than the existing Development Plan and would threaten delivery of development and would therefore form a restrictive approach to development which would bring less development forward than under the existing Development Plan.

3. Evidence base

Viability report

- 3.1 The Neighbourhood Plan is supported by a viability report produced by Aecom; however, fundamentally the viability report does not appear to reflect the requirements of the proposed Neighbourhood Plan policies.
- 3.2 It is very unclear if the scenarios tested included all policy requirements, which we have summarised in paragraph 2.93 of these representations.
- 3.3 The Aecom report, in Table 10, sets out some very limited 'policy cost' implications of a limited number of the draft policies.
- 3.4 In relation to policy EM1 it notes that EM1 (c) and (d) encourage small and affordable work space but that this is assumed to comprise ancillary floorspace to larger commercial units and will not have significant cost implications; no cost would appear to have been attributed. Furthermore, the 'policy cost' is not therefore based on the following requirements of the policy:
- The absolute requirement for existing B1(c) and B8 space to be maintained and, where feasible increased.
 - The design requirements of meeting the operational needs of existing businesses, or very similar businesses.
 - The need to charge all new B1(c) space at Greater London rental rates.
 - The need to provide the maximum viable level of affordable workspace.
- 3.5 Policy CS S11 is assumed to have no additional costs, in spite of the requirement for either on site community facilities and/or contributions to off-site improvements
- 3.6 In relation to policy HO1 there is no reference to the cost of the proposed affordable housing tenure, which differs to that in higher tier policy. The affordable housing tenure assumptions do not include London Living Rent, which is referred to in Neighbourhood Plan policy. Nor does it refer to the absence of the 25 unit threshold and tiered approach in Local Plan policy, though this may not be relevant, depending on the scale of development tested.
- 3.7 The costs assumed in relation to policy HO2 do not include the impact of providing 50% residential floorspace in an area which is not currently subject to this requirement within the Local Plan and may limit other floorspace delivery.
- 3.8 There are also a large number of policies not considered in Table 10, as set out in paragraph 2.93 above.
- 3.9 The viability study refers to the adopted dwelling size priorities table and not to the mix proposed in the Neighbourhood Plan.

Tested scenarios

- 3.10 Other than in terms of the assumptions set out in the viability report, and some details provided in the appraisals in Appendix E, such as the Net Residential Site Area, there is very limited information as to what the nature of the tested ‘high density mixed use urban scheme’ is, in terms of proposed land uses, proposed quantum, response to policy requirements, build height/form and resultant cost implications and so forth.
- 3.11 There does not appear to have been a range of development scenarios tested, in relation to these matters, nor in relation to site conditions within the Neighbourhood Plan Area – for example with regards to varied amounts of existing on-site floorspace in industrial use or community use, or with regards to the amount of existing on-site open space which may be deemed to be protected under draft policy.
- 3.12 It does not appear that the viability testing has included student accommodation and the draft Neighbourhood Plan requirements, including affordable student accommodation.
- 3.13 In order to be credible, the tested scenarios must reflect the sum total of draft policy requirements, which have been summarised in paragraph 2.93 of these representations – it is not at all clear that this is the case and it would appear from the limited information in the viability report that this is not the case. The viability report also needs to test a representation range of development scenarios across the Neighbourhood Plan area, including different scales of development and mixes of land use.
- 3.14 In the absence of sufficient information on viability to properly assess, LBC ASV reserves the right to submit more detailed viability evidence at the Examination.

Camley Street Neighbourhood Plan Evidence base (2015)

- 3.15 The evidence base document, which is now nearly four years old, notes that ‘A *fundamental requirement of a neighbourhood plan is a strong evidence base; this supports not only the credibility of the plan, but also justifies policy.*’ This is clearly the case and yet this is lacking from the Neighbourhood Plan submission.
- 3.16 In this case, the evidence base consists of two key strands: survey information of some of those living and working in the area; and datasets such as Census data and GLA data. We question the relevance and validity of much of the survey-based data. In particular:
- The views of residents and businesses within the area must be considered within the context of the wider population of Camden, given that the policies in the Neighbourhood Plan form a Development Plan document which has wider implications and will in the future accommodate additional homes and workplaces, responding to development needs for a population which extends beyond the Neighbourhood Plan area.
 - Aspirations of the local community are an important consideration but do not equate to robust evidence of need for particular land uses, for particular operators or for specific infrastructure or facilities; this must also be based on an

objective assessment using commonly accepted methodology, such as that used in the Local Plan evidence base.

- The desire of business operators and employees to retain their existing premises cannot reasonably be considered an objective basis from which to derive land use planning principles. The strategic role of these businesses and of these Use Classes in the local and wider economy should be assessed on an objective basis and this has not been done.
- It is also noted that only five business owners completed the survey questionnaire and this seems to be a limited sample which could skew the results of the survey. The fact that all of the five businesses owners surveyed indicated that they did not wish to move or relocate outside Camley Street in the following 12 month period (i.e. in 2016) is not a robust evidence base for land use planning purposes. Planning is not in place to protect private property interests but, quite the opposite, to mediate between competing demands on land for the wider public benefit.
- It is unclear why, given that survey respondents considered there to be a '*satisfactory amount of green space*' (albeit that the survey suggests respondents felt the need for better maintenance of those spaces), that this is taken as evidence that new open spaces are required. Again, an objective assessment of green space provision per capita, in relation to the current and projected population, would be more appropriate. This also would seem to contradict the spatial analysis within the evidence base, which finds that the majority of residents have good access to parks and open spaces.
- Evidence of higher overcrowding within housing and the proportion of families in the area is a relevant consideration; however, Camley Street does not operate within a closed housing market at the boundaries of the Neighbourhood Plan area and the wider Development Plan evidence for the adopted housing mix priorities is far more extensive and has been tested at public examination. New residential developments are not solely responding to local need within a tightly defined Neighbourhood Plan area.
- Furthermore, the local evidence, in terms of data, suggests greater housing affordability in the area than in Camden more generally.
- Housing was the single greatest priority amongst those surveyed, in terms of land use and this does not seem to be reflected in the focus of the Neighbourhood Plan on protecting named commercial businesses.

3.17 On review, the evidence base is very limited and, without accompanying objective assessments relating to Camley Street and its wider context, provides very little justification for the policies set out within the draft Neighbourhood Plan.

4. Response to previous representations

- 4.1 LBC submitted representations to the previous (draft) version of the plan.
- 4.2 The Submission Version is accompanied by the Tibbalds (2019), Camley Street Neighbourhood Development Plan (2019 - 2034) Consultation Statement. This includes a table setting out the Local Authority comments, on page 98, and Camden Council Asset Strategy and Valuations Team Comments, on page 111.
- 4.3 The consultation response document provides inadequate responses to a number of critical issues, including:
- The rationale, justification and ability, in planning terms, to set commercial rental levels; comparisons to affordable housing are not directly relevant and planning policy does not control open market rents or house prices. The Consultation Statement sets out no real justification for the proposed control of open-market rental levels through the Neighbourhood Plan policy. Support for this principle within a consultation exercise (although clearly not by all parties and all land owners) does not form an adequate response to this matter.
 - The lack of flexibility to respond to future circumstances, as a result of the need to provide floorspace specifically designed for B1(c) and B8 operations (as opposed to flexible commercial space which could accommodate B1(c), B8 and a range of uses) and in particular the protection of specific named businesses. All new floorspace should be provided with flexibility to be used in the future in all manner of different ways, to protect against potentially redundant floorspace; it is not sufficient to design floorspace that would be specifically suited to specific occupiers, as well as to suitable comparable businesses.
 - The Neighbourhood Plan has not been supported by adequate evidence to demonstrate that the existing B1(c) and B8 uses have a strategic role in the Borough or the CAZ and we question the concept of a strategic role within a local area. A desire within the local community to protect specific uses is not the same thing as evidence of a need to protect those uses, particularly where those uses include specific named businesses within that same local community.
 - The justification for referring to specific named businesses at all, which is clearly outside the remit of the planning system.
 - Conflicts with Local Plan policy in the above areas.
 - The lack of due consideration given to how to address the potential incompatibility of B8 use with residential floorspace.
- 4.4 As set out above, the evidence base is not robust and therefore responses to the previous representations which rely on the evidence base are not sound. No fundamental changes have been made to the Neighbourhood Plan as a result of the points raised in the Local Authority's consultation comments.

- 4.5 The consultation report contains a reference to the draft London Plan, with respect of its classification of Camden as a borough in which industrial capacity should be retained. The comments set out in relation to this are inaccurate: with regards to the 'retain' category, the London Plan sets out that there should be '*no net loss across designated SIL and LSIS*'. This does not relate to undesignated sites contrary to the meaning inferred within the consultation report.
- 4.6 The consultation statement also sets out that '*It is envisaged within the NPPF and PPG that Neighbourhood Development Plans should provide more detailed policies **with less flexibility** than Local Plan policies*'. This statement does not accord with our understanding of the NPPG, PPG and Basic Conditions tests, in particular:
- NPPF para. 13: The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
 - NPPF para. 29: ... Neighbourhood plans **should not promote less development** than set out in the strategic policies for the area, or undermine those strategic policies.
- 4.7 PPG reflects the basic conditions test of the Town and Country Planning Act, which includes a requirement to 'contribute to the achievement of sustainable development' (d) and that the plan must be 'in general conformity with the strategic policies contained in the development plan. General conformity is set out in para. 074 of the PPG and includes a requirement that any 'additional level of detail and/or distinct local approach' cannot undermine strategic policy and must be based on a clear rationale and justifying evidence.

5. Conclusions

- 5.1 The draft Camley Street Neighbourhood Plan raises a number of concerns for our client:
- There are a wide range of policy requirements which, taken together, would undermine the deliverability of the Development Plan.
 - The draft Plan, as whole, and in relation to certain specific policies referred to below, would undermine the strategic policy objective of optimising the development potential of finite sites within the London Borough of Camden.
 - The primacy given to B1(c) and B8 uses undermines provisions in the Local Plan regarding flexibility; developments should be designed in order to be suitable and adaptable for a range of uses and changes in socio-economic circumstances.
 - The Neighbourhood Forum's position that the existing commercial uses are of strategic importance is not robust.
 - The Neighbourhood Plan sets out protection of specific operators and occupiers and in doing so would protect private land interests.
 - Controls on open-market commercial rents would be beyond the remit of the planning system.
 - The draft plan does not reflect the priority given to residential uses in strategic policy.
 - A strategic or area-wide approach should be taken to matters such as the provision of open space or social and community infrastructure, so that individual planning applications can be assessed with an understanding of context in this regard.
 - A number of policies, or provisions within policies, repeat Local Plan policy but often inaccurately and/or incompletely.
 - The draft plan contains a number of terms which are relevant to the application of the draft policies but which are either not defined or are poorly defined.
 - The evidence base to support the plan is limited, flawed and not robust in demonstrating a justification for and the deliverability of a number of key policy requirements proposed in the draft plan.
- 5.2 We consider that the draft plan fails to meet the Basic Conditions, as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The plan would be more restrictive and onerous than strategic policy and would threaten the delivery of sustainable development. The plan would not be in general conformity with strategic policies of the London Plan and Local Plan, as considered in detail within this report.

5.3 The plan would be contrary to the NPPF and PPG:

- In introducing policies which would undermine the delivery of strategic policies contained in the Local Plan and London Plan.
- In introducing policies which would not positively support development.
- As a result of the restrictions which would be imposed by the plan, the plan would have the effect of promoting less development than that set out at the strategic policy level.
- The plan would not contribute to sustainable development and in fact would undermine this through onerous policy requirements.
- The plan is not supported by sufficient and proportionate evidence.

5.4 With regards to general conformity, as defined with paragraph 074 of the PPG, the draft plan would undermine the approach set out in strategic policy:

- The plan would undermine a number of general principles of strategic policy, including with regards to site optimisation and flexible approaches to development, to allow for a range of current and future occupiers and future socio-economic changes.
- The plan would conflict with strategic policy through the inclusion of additional policy requirements and would contain measures relating to matters outside of the planning system, including in relation to private property interests and control of market rents.
- The plan would include a number of additional policy requirements, such as the maximisation of affordable workspace and the provision of affordable student accommodation for all schemes, which would be more restrictive than strategic policy.
- The rationale and evidence base is limited, flawed and not robust.

5.5 As a result, we consider that the draft Neighbourhood Plan requires fundamental re-drafting informed by a fresh approach to gathering evidence and setting the direction of the plan.

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Camley Street Neighbourhood Plan submission draft

Camden Council – local planning authority representation

This representation is being made by Camden Council in its capacity as local planning authority. Colleagues from the Council's property service will also be making comments on the Plan but these will be made separately reflecting the Council's role as landowner in the Plan area.

Throughout the development of the Neighbourhood Plan, the Council has commented on a number of draft plans and policies. This has helped to address conformity with Camden's planning policies and strategies and national planning policy. However, we consider there are some policies in the Plan which do not currently meet the Basic Conditions, because they are:

- not in "*general conformity with the strategic policies contained in the development plan for the area of the authority*", i.e. the Camden Local Plan (2017);
- do not have full "*regard to national policies and advice contained in guidance issued by the Secretary of State*".
- do not contribute "*to the achievement of sustainable development*".

The elements of the development plan relevant to Camley Street are the Camden Local Plan adopted July 2017 and the London Plan (consolidated with alterations since 2011) published in March 2016. The Local Plan was adopted more recently, was considered through examination to be in general conformity with the London Plan 2016, and consequently should be given greater weight.

A new draft London Plan was published in December 2017. The new London Plan has completed an Examination in Public and the Panel's report was published on 21 October 2019. However, there is still a long way to go before the new London Plan can be finalised, including a response from the Mayor to the Panel's report, scrutiny by the Secretary of State, and consideration by the Greater London Assembly. Consequently, limited weight can be given to the new London Plan at this stage.

We have structured our representation around our outstanding concerns. Notwithstanding these matters, the Council considers the Plan is a well-presented and visually engaging document and will have an important role in helping the Council to make decisions on planning applications in the area.

Policy reference and description	Council comments	Suggested change
<p>Policy CS EM1 criterion (a): for all existing employment sites requires the amount of B1(c) and B8 uses to be as a minimum maintained or increased</p>	<p>This provides far less flexibility than Camden Local Plan Policy E2 criterion (d) that states the Council will consider higher intensity redevelopment of premises or sites suitable for continued business use provided that: <i>“the redevelopment retains existing businesses on the site <u>as far as possible</u> (our underlining), and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy.”</i> The Neighbourhood Plan wording provides no ability to consider the wider benefits of an individual proposal. The approach is also likely to inhibit how a scheme might be delivered, for instance, the Local Plan promotes development through multi-site proposals (paragraph 2.14).</p> <p>We consider that this overly restrictive approach conflicts with the overall objectives of Camden’s Local Plan and its direction for the Camley Street area.</p> <p>The Local Plan commits the Council to “maximising” its housing supply with a target of 16,800 additional homes from 2016/17 to 2030/31 (Policy H1), which is to be achieved in part by: <i>“in all parts of the borough...the inclusion of self-contained homes in non-residential development”</i> (Policy H2, maximising the supply of housing from mixed-use schemes). Paragraph 3.43 states: <i>“Where it is not appropriate to develop a site entirely for housing, securing housing as part of a mixed-use scheme is another way of meeting some of our housing needs whilst also meeting other needs in the area, such as providing jobs, services and facilities”</i>.</p> <p>The Local Plan highlights where the most significant growth is expected to take place over the Plan period: in identified growth areas, other highly accessible locations and Community Investment Programme (CIP) area – of which Camley Street is one (Policy G1, Delivery and location of growth).</p>	<p>We consider that the policy needs to provide greater flexibility at individual site level to help promote other employment and priority uses in line with the adopted Camden Local Plan. The Council would not wish to see a reduction in the quantum of employment space but the ability to reprovide all of the existing B1(c) light industrial and B8 storage floorspace needs to be further qualified to take into account the optimal outcomes for the site, the practical and economic impacts of requiring reprovion of all industrial/storage floorspace and the effects on delivering redevelopment across multiple sites.</p> <p>We consider the approach as framed diverges too far from Policies G1, E1 and E2 of the Local Plan and is likely to make it much harder to deliver the beneficial outcomes for Camley Street identified by the Local Plan. Paragraph 13 of the National Planning Policy Framework is clear that</p>

	<p>The Local Plan states that <i>“a significant element of Camden’s expected growth”</i> will be through the CIP, the Council’s objective being to make <i>“best use of its property assets through regenerating sites and through selling sites that are now surplus to requirements”</i>. The CIP is intended to release funding that would otherwise not be available to reinvest into homes, schools and community facilities (paragraph 2.55).</p> <p>The success of this programme is defined in terms of its mixed-use and multi-site approach and it plays a critical role in ensuring the Council is able to meet both local identified housing needs (including the provision of affordable housing) and its London Plan housing targets. In total, the Local Plan’s Housing Trajectory (in Appendix 2) estimates that around 2,250 additional homes will be provided through the CIP.</p> <p>Policy G1 of the Local Plan notes that growth in Camley Street will be expected to fit in with the changing context of the wider area – notably the rapid growth of the ‘Knowledge Quarter Innovation District’ (a cluster of scientific and knowledge-based institutions and companies); the former railway lands at King’s Cross (which previously included some haulage and distribution-related activities and subsequently have been redeveloped as a high density business, residential, commercial and cultural centre of London-wide significance known as ‘King’s Cross Central’) and to the west, Camden Town (with expanding creative and cultural industries).</p> <p>The Local Plan has therefore already established a clear strategic vision for how Camley Street might adapt and change in the future and the nature of that growth. It states: <i>Camley Street should become a “more vibrant, attractive area that builds on its location adjacent to King’s Cross Central and close to Camden Town”</i> and makes <i>“a more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floorspace”</i> (paragraph 2.72). In developing this approach, the Council has needed to consider the unmet needs of growth sectors in the Borough and the nature of developments</p>	<p><i>“Neighbourhood plans should support delivery of strategic policies contained in local plans”</i>.</p> <p>The Council considers that Policy G1 in setting out the growth and spatial strategy for the borough and priorities for growth locations provides a strategic framework which a neighbourhood plan should help to deliver. Paragraph 29 of the NPPF states that neighbourhood plans should not <i>“undermine”</i> strategic policies in the development plan.</p>
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	<p>that are commercially viable and marketable and capable of being delivered in a timely way.</p> <p>Significantly, Policy G1 does not express a preference, or presumption, for light industrial or storage uses in the Camley Street area, nor does it require protection for individual occupiers. (Explicit protection of industrial floorspace in the Local Plan is only mentioned in the context of the Kentish Town Industry Area).</p> <p>We also consider the Neighbourhood Plan's requirement that B1c) and B8 floorspace must be reprovided on all sites is not in conformity with Policies E1 and E2 of the Local Plan which set out the employment objectives for the Borough and the Council's approach to retaining employment sites, including undesignated industrial land.</p> <p>Policy E1 identifies the growth sectors the Council wishes to support including the promotion of "<i>development of the Knowledge Quarter around Euston and King's Cross</i>". It also encourages proposals for the intensification of employment sites where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites. It states that industrial and warehousing sites and premises will be protected where they are "<i>suitable and viable</i>".</p> <p>Policy E2 promotes the "<i>higher intensity redevelopment of premises or sites that are suitable for continued business use</i>" provided "<i>the level of employment floorspace is increased or at least maintained</i>". It does not specify that the level of existing use classes such as B1c) or B8 should be maintained on every site. It recognises that existing businesses in specific sectors should be retained as far as possible and this may not be feasible in every situation. It identifies that redevelopment could provide space for start-ups, Small and Medium sized Enterprises and other priority use such as housing and acknowledges there may be circumstances where the relocation of businesses occurs.</p>	
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	<p>We support Policy CS EM1’s objective that employment floorspace should be <i>“as a minimum, maintained and preferably increased where feasible”</i>, however this should apply to employment floorspace of all types and not specify like-for-like provision of B1c) and B8 uses at individual site level.</p> <p>The Neighbourhood Plan’s inflexibility overrides the consideration of suitability and viability of Local Plan Policy E1. It also does not acknowledge the practical aspects of co-locating different uses which means it is not likely to be realistic to accommodate like-for-like provision on every site (e.g. due to 24/7 operations or movements by HGVs). Under the Neighbourhood Plan’s approach, there would be no ability for the Council to consider a lower quantum of industrial/storage floorspace than what exists now or proposals ‘converting’ any of this space to alternative employment uses.</p> <p>Even if planning policies express support for individual use classes, this has to be framed in the context of <i>“positively and proactively”</i> encouraging <i>“sustainable economic growth”</i> (National Planning Policy Framework, paragraph 81). We consider that the Neighbourhood Plan is not <i>“flexible enough to accommodate needs not anticipated”</i>, does not <i>“allow for new and flexible working practices”</i> or the ability to <i>“enable a rapid response to changes in economic circumstances”</i> (NPPF, para. 81). Rather, the Plan and this policy imposes an unreasonably rigid and uniform approach across all existing employment sites based entirely around existing businesses and current ways of working, putting at risk the vision for the area which Policies G1, E1 and E2 of the Local Plan allow. It imposes a requirement to replicate existing employment uses without considering the wider benefits and other priority uses that could arise from alternative/mixed use approaches, which can only be realised where planning policies provide a sufficiently supportive and flexible framework that takes into account the unique circumstances and constraints of each development site.</p>	
Policy CS EM1 criterion (b) requires all replacement	The Neighbourhood Plan is in conflict with Policy G1 by stating that the protection of industrial/storage businesses should be the starting point for	The Council considers this requirement should be deleted

<p>business and industrial floorspace to be suitable for existing, or comparable, occupiers</p>	<p>development proposals in the area. The Local Plan clearly envisages that Camley Street will be a focus for growth and that the area will adapt, and be influenced by changes that have occurred on nearby sites/areas. It is one of a number of areas that the Local Plan has identified as instrumental to the delivery of the continuing Community Investment Programme (CIP).</p> <p>The Local Plan’s employment policies confirm that the Council will seek to retain existing business operations as far as possible, however the extent to which this is desirable/achievable will be dependent on a range of factors, identified in paragraph 5.37. These include the suitability of the location for continuing business use; the condition of premises; the existing unit sizes provided and whether the business use is well-related to nearby land uses. The Neighbourhood Plan completely overrides such discretion in determining the acceptability of a proposal involving loss of industrial/storage space and prevents wider benefits from being taken into account, such as the delivery of other forms of employment floorspace for which there is a demand/identified as suitable by the Local Plan, or priority uses such as housing (and in particular affordable housing).</p> <p>The Council considers this criterion places an onerous and unreasonable requirement on landowners and developers to design their scheme around the needs of existing businesses. It would totally bind a landowner’s ability to decide what might be the best option over the long-term. Occupiers can change over time so it is not appropriate to tie a development to the needs of a particular firm at a particular moment.</p> <p>The approach conflicts with Policy E2 of the Local Plan which states: <i>“reprovided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium sized enterprises (SMEs) and businesses in growth sectors such as creative industries”</i> (paragraph 5.40) and <i>“Where it is proposed to redevelop employment land for another business use, the Council will seek to retain features that will</i></p>	<p>or reworded to allow greater flexibility to take into account other future employment uses and future occupiers.</p> <p>The reference to comparable occupiers should be removed because we do not consider this to be operable in decision making.</p> <p>As worded, the approach is overly restrictive and will greatly inhibit the ability of the area to grow and change, in line with the Camden Local Plan.</p>
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enable the flexible use of the premises for a range of business purposes. This will help to maintain the range of employment premises available and is especially important given the limited supply of non-office premises” (paragraph 5.42).

The Council considers that the Neighbourhood Plan’s approach will mean a significant proportion of employment floorspace in the Plan area will only be able to accommodate a narrow range of use classes and/or occupiers. Even if reprovided premises would be suitable for a number of different industrial/storage based businesses, the Council considers the approach does not take into account the needs of other types of employer, the nature of their operators and local demands for floorspace. Redeveloped premises should be designed around the needs of future users as well.

A further problem arises from the terminology “other comparable new occupiers” – this is likely to create uncertainty for decision makers as to which occupiers might be deemed to be comparable. Paragraph 16 of the National Planning Policy Framework states that *“Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”*.

As stated in reference to Policy CS EM1 criterion (a) above, while efforts should be taken to secure existing businesses within the Plan area, there may be circumstances where reprovision elsewhere may be necessary. The Local Plan does not state that all existing businesses must be retained in the Camley Street area.

The Neighbourhood Plan refers to existing supply chains, the need for face-to-face relationships and timely/sustainable deliveries as being factors to justify protection of a list of named businesses in paragraph 6.7.7. However, this is more of an explanation of why these firms originally came to be located in Camley Street, it does not address whether the businesses would be able to operate from an alternative location, subject to their need to continue to supply the CAZ or employ

	<p>local people. It is not possible to conclude from the information presented in the Plan that Camley Street is the only suitable location in which these businesses may be able to operate successfully. The effect of this criterion is to prioritise private business interests over wider public benefits and land uses supported by the Camden Local Plan.</p> <p>A minor factual point is that the list of protected businesses is accompanied by text suggesting they are all located in Cedar Way when Alara and Booker Cash & Carry operate from other sites on Camley Street.</p>	
<p>CS EM1 criterion (d) requires all new B1 (c) floorspace to be provided at average Greater London rental rates at the time of development. CS EM2 widens this out to a list of protected businesses in para. 6.7.7 that provide an employment opportunity for Camden residents and supports CAZ functions</p>	<p>The Council considers this goes beyond what planning policy is capable of influencing and the level of rents being proposed is not appropriate at this location, which is on the edge of central London and therefore would be expected to attract a premium on rents compared to a Greater London average. No evidence has been provided to justify the approach.</p> <p>Business rents are a product of negotiation between an individual landowner and their tenant based on a wide range of factors such as the condition of the premises, the site's location and market demand for the accommodation. While the Camden Local Plan supports the provision of an element of affordable workspace on larger schemes, this is always subject to viability and allows for other planning benefits of an individual scheme to be taken into account. The Neighbourhood Plan takes on a role which is legitimately that of the individual landowners. The approach would potentially be a considerable burden on development, making individual schemes unviable / reduce the range of benefits they would otherwise be able to offer.</p> <p>We consider that the approach is not relevant to the assessment of a planning application and even if it was, the use of a single rent is overly simplistic and arbitrary. The Neighbourhood Plan's own Viability Assessment acknowledges that the inputs into its modelling, including rents, are "broad brush for the purposes of a high level study" and notes that <i>"values between new developments and within new developments will vary considerably in reality based on location, situation, unit type and</i></p>	<p>The Council considers that the requirements for an average central London rent to be applied to all new industrial uses in the area should be removed. This is not something which a planning policy can be used to influence. We, however, consider it would be reasonable to include reference in the Plan to negotiation of an element of affordable workspace in schemes, where this has been demonstrated to be viable and taking into account all of the planning benefits of an individual proposal.</p>

the state of the market at the point of marketing". The Plan, as drafted, does not allow these important matters to be considered.

The Viability Assessment also acknowledges that the effect of prices/rents on individual landowners' willingness/choice to release land for development: *"The reality of the market is that each and every landowner has different requirements and different needs and will judge whether or not to sell by their own criteria. In this instance the landowner is LBC which both has a duty to deliver sustainable (sic) and also to achieve best value as a public sector body. We therefore have to consider how large such an 'uplift' or 'premium' (above EUV) should be broadly to provide a comprehensive return. The assumptions must be a generalisation as in practice the size of the uplift will vary from case to case depending on how many landowners' are involved, each landowner's attitude and their degree of involvement in the current property market, the location of the site and so on"*. The above quote emphasises the unique circumstances of each individual site or premises in valuation terms and also possible additional constraints/obligations on owners, such as the Council, to exercise 'best value'. The Neighbourhood Plan entirely removes the market mechanism and prevents any consideration of individual site and business circumstances, including by the landowners concerned.

We are also concerned that Policy EM2 implies that this subsidised rent should be extended to the full list of protected businesses in paragraph 6.7.7. Planning policy documents are not used to set rents for individual businesses.

We consider this approach contradicts the National Planning Policy Framework's objective of *"Building a strong, competitive economy"*. The Plan's emphasis on protecting existing occupiers and setting rents will make it impossible for the Council to apply the vision for Camley Street set out in Policy G1 of the Local Plan. This is despite the NPPF requirement for local planning authorities to: *"...set criteria, or identify strategic sites, for local and inward investment to match the strategy and*

	<p><i>to meet anticipated needs over the plan period” (paragraph 81).</i></p> <p>Although the Local Plan has considered the “<i>locational requirements of different sectors</i>”, in particular the high growth and high productivity industries and services identified in paragraph 82 of the NPPF, the Neighbourhood Plan is in opposition to this approach by applying restrictive policies to a strategic growth area of the borough.</p>	
<p>Policy CS EM1 criteria (c) and (e) require redevelopment schemes for existing employment sites to provide start-up, move-on space and affordable workspace, subject to feasibility and viability</p>	<p>Whilst the Local Plan supports efforts to secure the affordability of workspace for SMEs as part of developments, it is clear that terms should be agreed with developers on a “<i>case by case basis</i>” (paragraph 5.44). This provides greater flexibility for developers to propose models that reflect the particular circumstances of individual schemes. This approach is mirrored in the London Plan where affordable workspace is defined as being “below the market rate for that space”, but is not prescriptive of the rate or model on which it is offered.</p> <p>The Neighbourhood Plan’s requirement that the “<i>maximum viable amount of affordable workspace</i>” is provided allows less flexibility for different site circumstances/proposals than the Local Plan where an “<i>element</i>” of this space can be offered to satisfy Policy E2.</p>	<p>We suggest criterion e) is reworded to state that a proportion of the space for start-ups and SMEs should be provided at affordable rents, subject to viability</p>
<p>Policy CS EM1 – the final paragraph refers to the use of a specialist provider for office and light industrial uses to support existing and new small businesses</p>	<p>The use of an affordable workspace provider is suggested within the Council’s Employment Sites and Business Premises CPG as one option for the provision of affordable workspace. It is often suitable for the management of workspaces hosting a number of start-ups and micro businesses. It is unlikely that this model would be as suitable for some of the existing established businesses on the site, where a lease arrangement with the landowner may be appropriate. We therefore consider that the use of an affordable workspace provider should not be prescribed as a sole option as this is not in general conformity with the Council’s approach.</p>	<p>We suggest rewording of this paragraph as follows to allow greater flexibility for when such specialist providers are sought:</p> <p>“<u>Where</u> the affordable workspace <u>is</u> provided on-site, should be managed by <u>management</u> by a specialist provider for office and light-industrial uses <u>may be appropriate</u> to support existing and small businesses. The provider...specific needs”.</p>
<p>Policy CS EM2 refers to existing businesses being</p>	<p>The Council does not consider it to be reasonable for the policy to require existing businesses to be offered such floorspace. Criterion (d) of this</p>	<p>We consider that the stipulation of an offer of “<i>equivalent</i></p>

<p>offered equivalent replacement floorspace.</p>	<p>policy states that “<i>existing businesses on the site</i>” should be retained “<i>as far as possible</i>”, allowing flexibility to consider other light industrial space formats and other employment uses on the site, subject to the overall level of employment floorspace being maintained (as per Policy E2 of the Local Plan). This would prevent the optimal use of land and could result in the reprovision of very low/low density uses.</p> <p>We also do not agree that if the existing occupiers were to move out, then the space should be offered to “<i>comparable business and industrial operators</i>” at average Greater London rents. We do not consider that planning policy can be used to control rents in this way.</p>	<p><i>replacement space</i>” is removed as this prevents consideration of other light industrial formats and other employment uses that the Local Plan has identified as appropriate in the Plan area nor does it consider the compatibility of this floorspace with other priority uses such as housing (e.g. due to 24/7 operation or use of HGVs). The reference to in perpetuity rent reductions should also be removed.</p>
<p>Policy CS HO1 (a)</p>	<p>The introductory clause and clause (a) of this policy seek to amalgamate elements of the Camden Local Plan, the London Plan 2016, and the draft London Plan (not yet finalised). In doing so, the policy places too much weight on the draft London Plan, and misinterprets both the adopted and the draft plans.</p> <p>As drafted, clause (a) of Policy CS HO1 is not consistent with Local Plan Policy H4, in a number of respects:</p> <ul style="list-style-type: none"> CS HO1 clause (a) refers to the maximum viable quantum of affordable housing, which would generally be taken as a reference to the number of dwellings, whereas Policy H4 clause (c) states that targets are applied to additional housing floorspace proposed. The Local Plan has adopted floorspace in applying the affordable housing targets in order to achieve a proportion of large affordable homes, whereas applying the target to dwellings creates an incentive for the developer to provide the smallest possible affordable homes. Paragraph 4.6.3 of the draft London Plan (published with consolidated changes to July 2019) provides for the percentage of affordable housing to be based on habitable rooms or habitable floorspace. 	<p>We suggest removal of the references in CS HO1 (a) to: the "viable quantum of affordable housing"; "a minimum of 50% on publicly owned land and 35% on all other land"; and "60% London Affordable (or similar) rent, 40% London Living Rent (or similar)".</p> <p>We suggest that the following alternative wording would be in conformity with the development plan: "Delivering the maximum viable proportion of affordable housing on site:</p> <ul style="list-style-type: none"> With a target of 50% in developments with

	<ul style="list-style-type: none"> • CS HO1 clause (a) distinguishes between a target of 50% on publicly owned land and 35% on all other land. This conflicts with Policy H4 clause (e), which sets a target of 50% affordable housing for <i>all developments with capacity for 25 or more additional dwellings</i>, and clause (d) which sets lower targets on a sliding scale for smaller schemes. This element of CS HO1 is also incompatible with Policy H5 of the draft London Plan (published with consolidated changes to July 2019), which sets a strategic target for 50% of London's new homes to be genuinely affordable. In line with the final paragraph of Policy H4, where the initial affordable housing contribution falls short of the 50% target, the Council seeks deferred contingent contributions towards affordable housing based on an updated assessment of viability close to completion. Setting a 35% affordable housing target for privately owned land conflicts with CS HO1's aspiration to deliver the maximum affordable housing that is viable. • The final bullet point of CS HO1 clause (a) refers to a desired affordable housing mix of 60% London Affordable Rent and 40% London Living Rent. London Affordable Rent and London Living Rent are specific affordable products devised by the Mayor in association with the Affordable Homes Programme 2016-21 Funding Guidance. Policy H4 clause (a) sets a guideline mix of 60% social-affordable rented housing and 40% intermediate housing, based on the generic terms used in Policy 3.11 of the London Plan 2016. While London Affordable Rent is a form of social-affordable rented housing, and London Living Rent is a form of intermediate housing, we consider that reference to these specific products conflicts with the Local Plan, is unduly restrictive, and could well become obsolete when the next funding guidance is produced. 	<p>capacity for 25 or more additional homes, and an aspiration....</p> <ul style="list-style-type: none"> • Viability Assessments... • The desired affordable mix is 60% social-affordable rented housing (such as London Affordable Rent) and 40% intermediate housing" <p>For consistency, we suggest that the final sentence of supporting paragraph 6.11.3 should also be amended to:</p> <ul style="list-style-type: none"> • replace the phrase "(by habitable room)" with the phrase "(by habitable room and/ or floorspace)"; and • replace the phrase "and a minimum expectation of 50% on publicly owned land and 35% on privately owned land, subject to viability..." with the phrase "and a target of 50% affordable housing in developments with capacity of 25 or more additional homes, subject to viability..."
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<p>Policy CS HO1 (b)</p>	<p>As drafted, clause (b) of Policy CS HO1 conflicts with the Local Plan Policy H6, and Policy 3.8 of the London Plan 2016.</p> <p>CS HO1 clause (b) seeks “adaptable units for older people and those with a disability subject to locally assessed need”. The Neighbourhood Plan does not offer any local assessment of data, or any justification for this particular approach. Clause (b) is in direct conflict with the London Plan and the Local Plan, which set detailed requirements based on evidence and apply across the capital and the borough respectively, as follows:</p> <ul style="list-style-type: none"> • provision of 90% of new build homes in each development to meet the requirements of Building Regulations Part M4(2) for <i>accessible and adaptable dwellings</i>; and • provision of 10% of new build homes in each development to meet the requirements of Building Regulations Part M4(3) for <i>wheelchair user dwellings</i>. <p>The approach proposed in CS HO1 (b) would harm the Council's ability to enforce these London-wide requirements, and harm the delivery in the Neighbourhood Plan area of homes that are adaptable to meet the needs of people with mobility difficulties, including older people.</p>	<p>We suggest the removal of the reference in CS HO1 (c) to "adaptable units for older people and suitable housing for those with a disability subject to locally assessed need".</p> <p>We suggest that the following more general wording would be in conformity with the development plan: "...homes suitable for families, and homes suitable for older people and people with disabilities".</p>
<p>Policy CS HO3</p>	<p>As drafted, Policy CS HO3 is unduly restrictive, and conflicts with the housing targets and the targets for meeting student housing need set out in Local Plan Policies H1 and H9, and Policy 3.8 of the London Plan 2016. The restrictions proposed in Policy CS HO3 would prevent delivery of any purpose-built student housing in the Neighbourhood Plan area.</p> <p>Policy CS HO3 clause (a) seeks to require 90% of new homes in the Neighbourhood Plan area as permanent self-contained homes in Use Class C3, and consequently limits the proportion of student accommodation to 10%. Furthermore, policy CS HO3 (e) seeks to prevent development of mono-use student blocks. The evidence offered for this position in the Neighbourhood Plan's supporting text relates to:</p> <ul style="list-style-type: none"> • the proportion of the households in the Neighbourhood Plan area that contain full-time students, said to be 9% (paragraph 6.14.1); 	<p>In Policy CS HO3, we suggest that the criteria-based element of the policy should be removed, leaving only the first and final sentences in their current form.</p> <p>We suggest that the following alternative wording of the criteria-based part of the policy would be in conformity with the development plan: "Developments may provide accommodation designed</p>

	<ul style="list-style-type: none"> • a building claimed to be a single-use student block at 103 Camley Street (paragraph 6.14.2); • student housing delivery in the years up to the adoption of the Camden Local Plan (paragraph 6.15.3); and • growth in student housing across the wider St Pancras and Somers Town ward (paragraph 6.15.4). <p>Local Plan Policy H1 seeks to exceed a target of 16,800 additional homes by 2030/31, including 11,130 self-contained homes. Thus across the borough, the expected proportion of self-contained homes expected as part of the target is 66%. Local Plan Policy H9 seeks to meet or exceed a target of 160 additional student homes per year, equivalent to 2,400 homes up to 2030/31. This target was set in the light of past delivery of student accommodation, so delivery in the 5 years up to 2016/17 does not diminish the target going forwards.</p> <p>Clause (i) and (j) of Local Plan Policy H9 seek to ensure a mixed, inclusive and sustainable community, and avoid harmful concentrations in any local area. Guidance on concentrations is provided in the Council's Supplementary Planning Document "Camden Planning Guidance – Student Housing". Paragraph 3.12 of the Supplementary Planning Document indicates that concentrations may have an unacceptable impact on the mix, inclusiveness and sustainability of the community where a proposal will result in resident students representing over 25% of usual residents in the ward and/ or over 800 beds in student accommodation within a radius of 300 metres from the application site. The Euston Area Plan 2015 also limits student accommodation to 25% of that area's new housing.</p> <p>The Council considers that Policy CS HO3 is far more restrictive than is justified by the evidence. Census 2011 data and subsequent data from the Higher Education Statistical Authority (published in Appendix B of Camden Planning Guidance – Student Housing) indicate that students represent 11% of the borough's usual residents, compared with almost 22% in St Pancras and Somers Town ward, and well over 30% in the</p>	<p>specifically for students subject to the following criteria:</p> <p>a) the development should contribute to creating a mixed, inclusive and sustainable community and should not create a harmful concentration of student accommodation in the area;...</p> <p><i>[criteria (b) to (d) retained unchanged];</i></p> <p>e) the inclusion of student accommodation within mixed-use developments is preferred to mono-use student accommodation."</p>
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	<p>King's Cross and Bloomsbury wards. While the proportion and growth of students in the St Pancras and Somers Town ward are clearly considerations, these must be set against the relatively low proportion of households containing students within the Neighbourhood Plan area (Neighbourhood Plan paragraph 6.14.1 states that around 9% of households in the area contain full-time students).</p> <p>103 Camley Street is the only purpose-built student accommodation in the Neighbourhood Area, although there is a cluster of schemes nearby on St Pancras Way. 103 Camley Street is <i>not</i> a mono-use block: as well as 307 student rooms, it contains incubator business space, a convenience store, a coffee shop and 40 self-contained homes. It is the only student housing scheme developed in Camden since 2004 that contains any self-contained homes available to non-students, and is one of the smallest freestanding developments of student housing to come forward in Camden since 2009. Student housing developments need to reach a critical mass to cover the management overheads of the accommodation, and limiting student accommodation to 10% of all housing in the Neighbourhood Area will effectively preclude a student housing development large enough to do so. A requirement for the inclusion of self-contained homes within the scheme is contrary to our experience of the development model of student housing providers since 2004, and is also likely to preclude student housing development in the Neighbourhood Plan area.</p>	
<p>Policy CS CSN1 refers to the provision of social infrastructure</p>	<p>The Council agrees that proposals involving social infrastructure should be subject to community engagement and consultation, and as part of this we would expect the Forum to be consulted. There is, however, no need for this to be stated in a planning policy; there will also be other organisations/bodies that may wish to comment.</p> <p>The policy should also be worded more flexibly to recognise that the Council has an established ward-based spending system for the local proportion of the Community Infrastructure Levy (CIL). This involves the prioritisation of projects by ward councillors, taking into account any spending proposals/lists contained in neighbourhood plans. While the</p>	<p>We consider the specific reference to the Forum's role in commenting on proposals involving social infrastructure should be removed. It does not directly relate to the development and use of land.</p> <p>We suggest the following rewording: "Developers of major proposals will be</p>

	<p>majority of local CIL funding is spent on projects in the ward in which it was originally collected, there is discretion to consider proposals across ward boundaries which can still provide a benefit for residents.</p> <p>Reference in the policy to the NP Area boundary is too restrictive as community facilities located outside of this boundary could also be accessed by people living and working in the area.</p>	<p>expected to consult with the <u>local community</u> 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)".</p>
<p>Policy CS GI1 relates to the Protection and Enhancement of Existing Open Spaces and Policy CS GI 2 to New Open Space Provision</p>	<p>The Council considers that the approach across these two policies and the order they appear in the Neighbourhood Plan is not consistent with the Local Plan because it gives the impression the Council may automatically seek financial contributions, in lieu of provision, towards the provision of open space. Local Plan Policy A2 and Camden Planning Guidance: Public Open Space seek on-site provision of open space first. Only if it has been demonstrated to the Council's satisfaction that this would not be feasible or viable would the Council accept off-site provision or a financial payment.</p> <p>Without further clarification, there is a risk the Council could miss out on the ability to secure provision of additional open space in the Plan area, contrary to Neighbourhood Forum's/Plan's objective that "<i>Development will increase the range and quality of an accessibility to green spaces in the Neighbourhood Area</i>". We also consider there is a risk that it will not be fully "<i>evident how a decision maker should react to development proposals,</i>" contrary to paragraph 16 d) of the NPPF.</p> <p>It should also be noted that the requirements to provide open space on-site are subject to a threshold and is dependent on the type of development (as set out in Camden's Public Open Space CPG), therefore not all developments would be required to provide public amenity space as Policy CS GI2 criterion a) states. Not all types/size of development would need to provide private amenity space.</p>	<p>We suggest that paragraphs 6.20.1 and 6.21.1 acknowledge that the 'cascade approach' to open space contributions set out in Policy A2 of the Local Plan applies and therefore, the Neighbourhood Plan should be read in conjunction with this policy.</p> <p>It would also be helpful to state that further guidance on the implementation of Policy A2 is provided in the Council's CPG: Public Open Space.</p> <p>In CS GI2 criterion a) we suggest amending as follows: "Providing appropriate new green and open spaces within all new development including private and public amenity spaces".</p> <p>We suggest rewording of this part of criterion b) as follows:</p>

	<p>Policy CS GI criterion (b) states “existing open areas of townscape, amenity or ecological value” should be retained and compensation provided (a “must”) “Where lost is unavoidable”. It is unclear where these spaces open areas are located: this will presumably be established through analysis of the site. However, we consider that it may not always be possible to secure ‘like-for-like’ re-provision and there may be wider benefits from a proposal it is important to take into account.</p>	<p>“...Where loss of <u>undesigned green space</u> is unavoidable, replacement of the same area, must be provided as a minimum <u>will be sought</u>, within close proximity to the existing green space <u>where possible</u></p>
<p>CS GI 1 e) protects residential gardens by resisting development</p>	<p>While we note the comments in the NP paragraph 6.21.8 about permitted development, the nature of this policy is take it takes a blanket approach to protection across a fairly wide area. It doesn’t allow consideration of individual proposals, its impacts, the effect on the garden etc. It could potentially prevent otherwise acceptable development and therefore contradicts paragraph 16 criterion a) of the National Planning Policy Framework which states that “Plans should be prepared with the objective of contributing to the achievement of sustainable development”</p> <p>We consider there should be some qualification or additional criteria that allows a decision maker to assess schemes on a case-by-case basis. The criterion is also not entirely clear whether it is seeking to resist the entire loss of a garden or the partial loss as well.</p>	<p>We suggest rewording as follows: “Protecting existing residential gardens <u>by</u> and resisting self-contained residential development that would <u>have a detrimental impact on the local townscape or result in a significant loss of residential amenity</u> lead to a loss of such spaces.</p>
<p>Policy CS GI1 criterion f) states development should be refused which would have a direct or indirect harmful impact on listed environmental assets.</p>	<p>This is overly restrictive as it does not take into account other policies in the development plan; it also treats the open spaces it mentions as having the same status/value when the Regent’s Canal and Camley Street are Metropolitan Sites of Importance for Nature Conservation (part of the London’s Canals SIN) whereas Elm Village is a designated local amenity space on Camden’s Policies Map.</p> <p>It does not provide clarity for decision makers because it refers to other unidentified receptors – “but not limited to” – which could potentially be anything The Council considers this conflicts with National Planning Policy Framework paragraph 16 criterion a) “Plans should be prepared with the objective of contributing to the achievement of sustainable development” and criterion d) “contain policies that are clearly written and</p>	<p>We suggest rewording of this criterion as follows: “<u>Development should avoid a Refusing development that would have a direct or indirect harmful impact on,</u> but not limited to, the Regent’s Canal, Camley Street Natural Park and Elm Village Open Space”.</p>

	<i>unambiguous, so it is evident how a decision maker should react to development proposals”.</i>	
Policy CS DQ1 sets out design principles that all development in the neighbourhood area will be expected to respond to	<p>While we generally support the approach, not all of the principles listed will be relevant to every development scheme that comes forward in the Plan area. <i>“Existing industrial mix”</i> and strategic connections for walking and cycling will only be applicable to certain sites and sizes of scheme.</p> <p>Under “Landscape and ecology” the requirement to <i>“Retain existing formal and informal green and open spaces...”</i> goes considerably beyond Local Plan Policy A2: Open Space by extending protection to any green area, not just designated open spaces. We assume the term ‘formal’ refers to designated spaces. Spaces designated on the Council’s Policies Map have been identified by the Council because they deliver a range of open space functions and have been tested at examination. The quality and value of all informal spaces in the Neighbourhood area is presently unknown and could be wide ranging. We consider that more evidence is needed to justify why these spaces should be protected before this becomes an established principle in planning policy.</p>	<p>We consider that the introductory paragraph should state “where appropriate” as all of the principles will not be relevant to every development.</p> <p>We suggest rewording as follows: <u>“Retain existing formal and informal green and open spaces designated through the Camden Local Plan and shown on the Policies Map and seek to enhance....In addition, the value of undesignated green and open spaces should be considered and where clearly important for amenity or biodiversity, retained or reprovided, subject to the wider benefits of a development scheme. Explore opportunities...”</u></p>
Policy CS DQ2 refers to key connections and barriers to movement	As with CS DQ1 above, the policy needs to acknowledge this might not be applicable to the nature and size of every development	As with CS DQ1 above, the policy should state “where appropriate”.
Policy CS DQ3 promotes taller buildings subject to criteria being met	We don’t consider that King’s Cross is the main/only part contextual consideration. Elm Village forms part of the context and must also be taken into account. King’s Cross Central should not be used as such a benchmark because the heights of buildings there are based on the unique constraints and challenges of that area.	In the introductory paragraph we suggest removing reference to <i>“the wider King’s Cross development context”</i> as the primary basis for assessing the suitability of tall buildings.

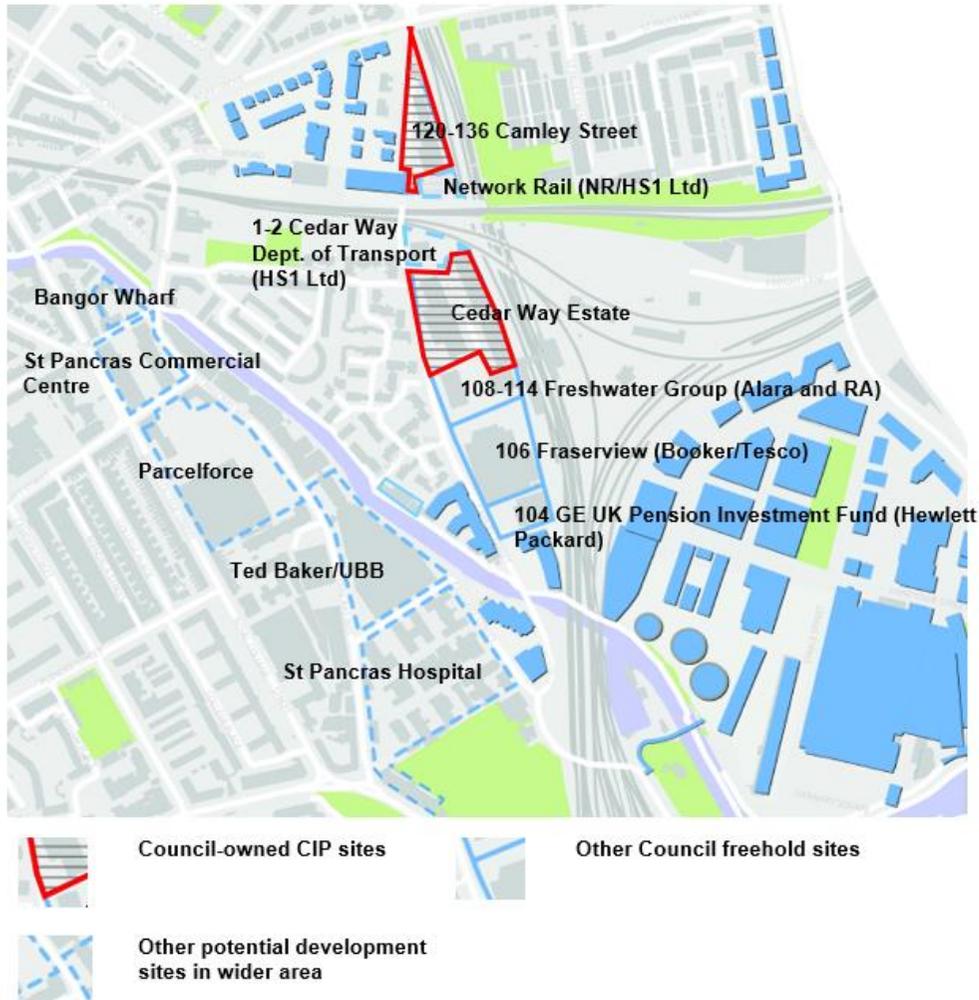
	<p>While we note that Figure 46 is “illustrative” it is not clear to what extent this has been guided by detailed consideration of the existing viewing corridor and may therefore, not be compliant with Policy D1 of the Local Plan. Without knowing if this has been subject to testing/modelling of impacts, we consider this image should be removed.</p>	<p>We suggest removing the image in figure 46 as it may not accurately portray the scope for tall buildings in this area.</p>
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The Council also wishes to raise a number of matters relating to the content of the introductory/non-policy elements of the Plan’s text. While these may not relate to the Basic Conditions, we consider these should be addressed to ensure the Plan can be used effectively by the Council, applicants and other stakeholders and to improve the clarity and accuracy of the document.

Page 5: the area diagram does not identify all the sites in the Plan area in which the Council has a freehold interest.

The diagram also incorrectly includes some of these sites as being part of Cedar Way Industrial Estate, when this is a distinct industrial estate site (and does not include 120-136 Camley Street to the north or 106-114 Camley Street to the south as indicated on the plan).

The correct Council landownership is shown on the map below.



Page 4 Para. 2.10 also refers to the physical barrier of railways “along the length of the Cedar Way Industrial Estate” which again appears to mean a number of sites along the east side of Camley Street.

Para. 2.30 – In support of a “food quarter” the NP identifies that there are 2,900 businesses in the food services sector in Camden with an average of 17 staff per business or 50,000 jobs. The source of this evidence is not identified unlike other evidence. The most recently published Camden Business and Employment Bulletin (August 2019) identifies that at 2017 there were just under 30,000 jobs in the combined Accommodation and Food Services sector in Camden. The Council considers the source should either be identified or this reference removed. There is also reference to some specific sites where “500 or so jobs are provided in the food sector”. The source of this figure is not referenced or provided. A Council survey in 2014 indicates that the number of jobs across the employment sites in the NP area could be less.

Para. 2.33 – The NP identifies a Deliveroo or Just Eat distribution centre as being a potentially desirable use within “*the developed site*”. It is not clear if this relates to a specific site or area generally. But a use heavily reliant on motorcycles serving a wider business and residential catchment would be severely curtailed by the constraints and restrictions placed on vehicle movements to the north, west and east and does not appear to be an immediately sustainable or desirable use that the planning authority would want to see promoted. This is through experience of a similar facility granted temporary permission on appeal (r/o 115 Finchley Road APP/X5210/C/18 /3206954) and where resident concerns include impacts of noise from scooters, operating hours, food waste disposal, pedestrian and road user safety, air pollution and congestion.

As part of the conclusion it states:

“The change of use has economic benefits but it has resulted in a harmful and unacceptable impact on the quality of life of neighbouring occupiers and the character and amenity of the surrounding area”.

The temporary permission was granted on the basis of a number of mechanisms being in place to minimise impacts on residential amenity including ensuring motorised scooters are not used as one of the delivery methods in the future.

Para 2.40 states:

“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)”

Related to the comments about the NP area diagram the Neighbourhood Plan's priorities and policies for Camley Street are understood to apply to a wider tranche of sites than solely the Cedar Way Industrial Estate which is a specific site in the NP area but not correctly identified in the NP.

Paras 2.38 and 2.40 highlight economic inactivity levels (44.3%) compared to overall Camden levels (31.9%) in support of employment objectives, but indicates at 2.48 that inactivity levels within the NP are in fact lower than overall Camden levels (27.8%)

Page 18

The NP proposals state:

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*

Again, related to the comments about the NP area diagram; does this relate to the wider tranche of sites rather than solely the Cedar Way Industrial Estate which is a specific site within that wider area? We understand it to be the former but this needs to be made clear in the Plan.

It would be useful to clarify and identify the mixed use area to which many policies and objectives are directed earlier in the plan or in the key diagram (an area for mixed use development appears on P. 59, but confusingly in a diagram titled "Plan identifying opportunities for new connections in relation to Policy CS DQ2" .

This leads to uncertainty around which policies and objectives will apply to which sites.

Page 19

"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."

Again it is unclear whether this intends to refer solely to the distinct Cedar Way Estate site and which other sites in the Plan area.

Triggs, Andrew

From: Lisa Croasdale [REDACTED]
Sent: 20 September 2019 16:50
To: PlanningPolicy
Subject: Camley Street Neighbourhood Forum

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Policy people,

I live and work in Camden and I'm writing to support the Camley Street Neighbourhood Development Plan. I'm confident that after due consideration, you'll be awarding it your full backing.

It is a very intelligent, forward-thinking design and development plan, and an opportunity for Camden to retain and regenerate an urban site in a way that benefits existing Camden residents, businesses and their employees.

Camden needs to hold on to its skilled workforce and provide enough affordable housing for the people who keep the borough running. Everybody needs to eat, so it makes sense to have food providers on your doorstep. Lower food mileage means less clogged roads and less pollution; it's better for the environment as well as the food. Recycling the energy generated by the businesses to heat the homes is a particularly inspired feature, and ought to be far more widespread. This fully researched and rounded plan for a mixed use inner city site is the future, a view shared by the Guardian's architecture correspondent. Here's his piece about Community Land Trusts from 2017, in which Camley Street is mentioned. He's still very much in favour of and following the Camley Street plan's progress:

<https://www.theguardian.com/cities/2017/jan/16/radical-model-housing-crisis-property-prices-income-community-land-trusts>

It's all about long term thinking. Camden should be proud to back this plan, and proud to have the opportunity to get involved.

Lisa Croasdale
[REDACTED]

Triggs, Andrew

From: francis lucy [REDACTED]
Sent: 25 October 2019 12:20
To: PlanningPolicy
Subject: The Camley Street Neighbourhood Plan

Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan ,especially a design that discourages anti social behaviour such as rough sleeping and drug dealing both of which are rife in this area, and i think it should be adopted.
I live in the Camley Street Plan Area.

Many thanks

Lucy Francis

Triggs, Andrew

From: M Raggio (IMS) [REDACTED]
Sent: 20 September 2019 13:09
To: PlanningPolicy

Follow Up Flag: Follow up
Flag Status: Flagged

I work on Cedar Way Industrial Estate London N1C 4PD

I fully support the Camley Street Neighbourhood Development Plan as it propose to deliver the retention of the existing jobs and genuinely affordable housing.

I do not want to see any more loss of manual work for this area.

M.Raggio
London N1C 4PD
[REDACTED]

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Triggs, Andrew

From: Maeve O'Connor [REDACTED]
Sent: 19 October 2019 13:11
To: PlanningPolicy
Subject: Camley Street Neighbourhood Forum plan

This may be a duplicate reply but I would like to confirm that I strongly support this plan for Camley Street, particularly as it includes truly affordable rented housing.

Maeve O'Connor
[REDACTED]

Triggs, Andrew

From: magda segal [REDACTED]
Sent: 15 October 2019 08:18
To: PlanningPolicy
Subject: Camley St

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I was so pleased to see the Camley Street plan.

It offers everything that one would want to see in a large development. Supporting both business and residents with fantastic green spaces for us all to benefit from both physically and mentally.

This is a great opportunity for Camden to do something that genuinely supports everyone.

I hope the council has the foresight to grant planning permission for this brilliant plan.

Please could you keep me up to date with any developments regarding CamleySt development.

Kind regards

Magda Segal
[REDACTED]

Triggs, Andrew

From: Tia Petrou [REDACTED]
Sent: 25 October 2019 14:39
To: PlanningPolicy
Subject: I support the Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted.
I live/work in the Camley Street Plan Area.

Miss Matia Petrou
[REDACTED]

[Sent from Yahoo Mail on Android](#)

Triggs, Andrew

From: Maureen Royston-Lee [REDACTED]
Sent: 21 October 2019 19:56
To: PlanningPolicy
Subject: Re: Camley Street Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I fully support the Camley Street Neighbourhood Plan and strongly feel it should be adopted.
I live in the Camley Street Plan area.

Regards

Maureen Royston-Lee [REDACTED]

Sent from my iPhone

Triggs, Andrew

From: Max Bondi [REDACTED]
Sent: 24 October 2019 21:51
To: PlanningPolicy
Subject: Camley Street Neighbourhood Forum

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Council

Please consider this email as my written comments on the Neighbourhood Plan submitted by the Camley Street Neighbourhood Forum.

I am a resident of Bergholt Mews (within the designated neighbourhood area), and have a very strong interest in any proposed developments for the site.

I believe the plan squarely meets all of the Basic Conditions, and represents the best possible proposal for how to develop the area, taking into account the views and interests of the current residents and business community.

Particularly key in this regard are the points made in the Basic Conditions statement related to:

- sustainable development
- promoting healthy and safe communities.

The plan includes provision for :

- mix of genuinely affordable homes,
- open, green, and public spaces
- mixed use business, retaining existing commercial communities
- environmental and sustainable practices considered throughout.

As a resident, worker, and community member, with a young family, I believe it is vital that development of this area retains investment by and for the community. This plan (and the Forum) have sought genuine local and community involvement and ownership throughout the entire process, and have produced a detailed and considered plan that meets the conditions set out while also pushing for a bold and imaginative solution that meets the needs of current and future residents. It also provides a genuine opportunity to Camden Council to adopt a forward-thinking and community-led plan that will significantly enhance the local area and offer an exemplary approach to modern, sustainable, urban development.

This opportunity should not be passed up.

Kind regards
Max Bondi

Triggs, Andrew

From: Catherine Mason [REDACTED]
Sent: 23 October 2019 14:05
To: PlanningPolicy
Subject: Camley Street Neighbourhood Development Plan Submission Version
Attachments: Camley Street NDP Submission Reqs Oct 2019.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir or Madam,

On Behalf of Metropolitan Properties Company Limited, please find attached representations submitted in respect of the above.

I would be grateful if you could confirm receipt of this email and attachment. If you have any queries or would like to discuss please do let me know.

Thanks,

Kind regards,

Catherine

Catherine Mason BA (Hons) MA MRTPI
Associate Director
Planning

Savills, 33 Margaret Street , London W1G 0JD



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**Camley Street Neighbourhood Development Plan
Submission Version July 2019**

**Representations on behalf of Metropolitan Properties Company Limited
October 2019**

Summary

My client is disappointed to see that their comments have not been addressed in the submission version of the Neighbourhood Development Plan (NDP) and our concerns therefore remain as previously.

There are a basic set of conditions which a neighbourhood plan should meet as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are*:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

*NB Only the basic conditions relevant to these representations have been included above.

The NDP as drafted does not meet the relevant basic set of conditions as set out below.

Background

These representations are submitted on behalf of Metropolitan Properties Company Limited (part of the Freshwater Group) who have a long leasehold on the Elm Village Industrial Estate. The site is approximately 0.3 hectares towards the northern end of Camley Street.

Camden's Local Plan (adopted 2017) identifies the Camley Street area as a Community Investment Programme Regeneration Area and recognises that:

'The area around Camley Street is undergoing significant change. Central London is extending northwards with the King's Cross Central development and the emergence of the Knowledge Quarter based around King's Cross/Euston and Camden Town is growing as a creative industries hub. In 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.'

The Local Plan identifies the following key emerging priorities for the area:

- *'creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town;*
- *enhanced connectivity and public realm, with more active overlooking of the street at different times of the day;*
- *creating new public spaces and greening of the street environment; and*
- *making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space.'*

It is generally recognised that the Camley Street area makes inefficient use of space and is in need of regeneration in order to tie in with the change which is occurring in the surrounding area. In our view the only realistic option for securing meaningful regeneration of the site and achieving the priorities identified above is predominantly residential led development perhaps with some small scale employment floorspace in the form of a hotel or offices, which could sit alongside each other in harmony.

Predominantly residential led development of the site is the only way to secure the long term benefits and regeneration for this area. Industrial redevelopment will not come forward on its own and would need to be heavily subsidised by residential development.

Retaining a similar quantum of industrial floorspace on site would result in the need for a podium or similar to be constructed with the residential above. This would be required in order to protect residential amenity and safeguard industrial occupiers from environmental complaints. We are concerned that the construction costs associated with this would make the scheme unviable and stymie development of this site.

The wider site is in multiple ownerships and whilst a masterplan approach may be desirable, this could take significant time to achieve and therefore each site should therefore be assessed on its own merits.

Notwithstanding that we believe that the most appropriate use for the site is predominantly residential led development, the policies as worded are confusing and contradict each other. Mixed use development of the site appears to be supported but this does not come through strongly enough, for example in Policy HO2 Residential Provision in Mixed Use Development. In order to address this, there should be an overarching policy on mixed used development which could either replace or sit alongside the other policies.

In order to ensure that regeneration of the area comes forward, the policies should allow flexibility to ensure that they can respond to changing circumstances. At present the policies are too rigid.

We have responded to the specific policies and paragraphs in turn below:

Core Objective 1: Employment (EM Policies)

We strongly disagree with this objective.

We remain concerned that the policies as worded are too restrictive and will prevent much needed regeneration of the area.

Policy **CS EM1 a)** states that redevelopment of existing employment sites must:

'a) 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.'

We do not think that the policy is realistic or justifiable, and therefore is not deliverable. In order to make the most efficient use of the site, the existing buildings would need to be demolished. It is our view that only residential values would unlock this. Maintaining the industrial floorspace as a minimum is not achievable. There may be potential to incorporate some employment floorspace in the form of office or hotel which would be more compatible with the character of the surrounding area.

The current restrictions in the policy will preclude redevelopment and prevent the priorities for the area set out in the Local Plan from coming forward.

Page 18 of the NDP identifies 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;*

The above recognises that to secure the retention / replacement of existing light-industrial floorspace in mixed-use building typologies would take innovative design. Light industrial and residential are clearly not naturally compatible uses and if this were to work, careful design with mechanisms (potentially podiums) to separate the two would be required. This would clearly be costly. The Camley Street Neighbourhood Plan Viability Study May 2017 (updated April 2018) by AECOM does not appear to take into account the cost of re-providing the existing employment floorspace alongside new residential. This needs to be taken into account in the viability assessment and we believe that this would have the effect of reducing the amount of affordable housing that can viably be provided.

Part d) of the policy states that any new B1(c) floorspace provided should be charged at average Greater London rental rates at the time of development. We do not think it is appropriate for this to be contained within the policy. Rental rates are market driven and will be self-controlled in this way.

Policy **CS EM2** requires that:

'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 provision in any redevelopment proposals. This offer should be made to those businesses at average Greater London 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.'

This policy goes too far and is not justified. Planning policies cannot control market demands and should not become involved with private business negotiations. This policy effectively holds landowners to ransom and forces them to renew leases even if tenants may act unreasonably.

Core Objective 3: Housing (HO Policies)

We continue to strongly disagree with this objective and associated policies.

The supporting text to Policy **CS HO1 (Paragraph 6.10.1)** states that:

'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 on the Cedar Way site of between 50% and 100% affordable.'

We are not convinced that mixed use development as envisaged by the policies would be viable with 50% affordable housing let alone 100%. We are again concerned that the policy will prevent any form of redevelopment coming forward. Proposals need to be realistic and not purely aspirational, if they are to be delivered. See above comment about the costs of re-providing the existing employment floorspace

Table 10 of the Camley Street Neighbourhood Plan Viability Study May 2017 (updated April 2018) by AECOM sets out an analysis of NDP Policy and identifies whether any of the policies would incur additional development costs over and above building regulations applying a RAG score. In relation to Policy HO1 the table states:

'A minimum of 50% affordable housing requirement is consistent with extant LBC policy. The aspiration for 100% affordable units will have viability implications; a traditional developer would not be able to deliver 100% affordable housing.'

This table seems to recognise that a traditional developer would not be able to deliver 100% affordable housing. Reference to 100% in the policy will create ambiguity and should therefore be removed.

Paragraph 6.2.2 of the Viability Study states:

'The appraisal results show that the CSSZ (Camley Street Sustainable Zone) can be considered developable over the plan period with the majority of scenarios producing positive residual values above the assumed EUV. However, provision of affordable housing at 50% is only shown to be viable in scenarios with a lower developer's profit (below 20% of GDV) or with a higher proportion of intermediate products'.

In relation to Viability Paragraph 18 of guidance to the NPPF states that:

'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies'.

Furthermore, the Mayor of London's Homes for Londoners Affordable Housing and Viability Supplementary Planning Guidance 2017 paragraph 3.32 recognises that:

'Developers will be seeking a competitive return in order to proceed with a scheme and to secure finance where required. The appropriate level of profit is scheme specific; evidence should be provided by applicants to justify proposed rates of profit taking account of the individual characteristics of the scheme, the risks related to the scheme, and comparable schemes. In line with PPG a rigid approach to assumed profit levels should be avoided and applicants cannot rely on typically quoted levels.'

Paragraph 6.22 of the Viability Study makes clear that 50% affordable housing is only viable at a developer's profit of less than 20%. The NPPF guidance makes clear that 15-20% profit is a suitable return for developers and in order to ensure that the NDP is effective, flexible and realistic the Viability Study should assess the affordable housing which is viable at the higher level. There is no justification for selecting a lower level for the study and this skews the outcome. The assessment with a developer's profit of 20% should then form the basis of the affordable housing policy in order to ensure that it is robust. Otherwise, future applicants will have to rely on viability evidence even though they are only seeking a reasonable level of profit. On the basis of the above, there is absolutely no justification for reference to 100% affordable housing in the policy

Notwithstanding that we disagree with the quantum of affordable housing referred to, the policy should place greater emphasis on the role that viability assessments can have in determining the appropriate level of affordable housing. Under a) there should be explicit reference to affordable housing being subject to viability assessments.

As currently worded the Policy conflicts with both National Guidance, the Local Plan and London Plan (adopted Housing SPG and adopted and draft new London Plan which both refer to 50%). Furthermore, the London Plan allows proposals to deliver 35% in certain circumstances.

Policy **CS HO3** supports student accommodation integrated into mixed use development that includes accommodation for other residents. The policy specifies that student accommodation will be permitted as part of mixed use developments provided that that at least 90% of new housing is permanent self-contained homes (C3) and mono-use student blocks will not be supported. Student housing provides a much needed form of accommodation and there is no justification for a cap. Student housing has proved a viable and popular use in the surrounding area, including the King's Cross Growth Area, and it would therefore tie in with the character of the area.

Core Objective 6: Design Quality (DQ Policies)

We support the recognition that there is potential for tall buildings in the area identified in grey as Mixed Use Redevelopment (including assessments for tall buildings) on Figure 45 of the plan. This is entirely appropriate given the scale of development coming forward in the surrounding area.

Conclusion

In our view the NDP submission version fails to have regard to national policy and advice as well as the adopted Local Plan and London Plan (emerging and adopted) and supporting guidance. The plan as worded will prevent sustainable mixed used development coming forward. The current insistence that existing light industrial should be maintained as a minimum and preferably increased is unrealistic and will prevent redevelopment of an under-utilised site coming forward. There are other meaningful employment uses which could be incorporated into any scheme which would be more compatible with residential development.

The current approach is likely to frustrate development of the site. The redevelopment of a brownfield site for predominantly residential use (with potential for some employment floorspace) in a time of significant housing need is unarguably sustainable development in principle. The above requirements of the Neighbourhood Plan as proposed will therefore frustrate the achievement of sustainable development.

We confirm that we wish to participate in a public hearing if one is held.

Triggs, Andrew

From: Mike Jackson [REDACTED]
Sent: 14 October 2019 14:37
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I have been working on several landscape maintenance contracts on some of the housing estates both on and adjacent to Camley Street for several years.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely,

Mike Jackson
[REDACTED]
[REDACTED]

Triggs, Andrew

From: ALDO LO CONTE [REDACTED]
Sent: 24 September 2019 15:33
To: PlanningPolicy
Subject: re Local Neighbourhood

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon

I agree with the Camley Street Neighbourhood Development Plan because I support the retention of the existing businesses and their varied employment.

I feel very strongly that Camden is allowing greed of money over livelihood and family community. It is a disgrace just like Boris.

Moyrum Lo Conte

Planning Policy Team
Basingstoke and Deane Borough Council
Civic Offices
London Road
Basingstoke
RG21 4AH

Lucy Bartley
Consultant Town Planner

Tel: 01926 439116
n.grid@woodplc.com

Sent by email to:
planningpolicy@camden.gov.uk

24 October 2019

Dear Sir / Madam

**Camley Street Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGDDL). Since May 2018, NGDDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Assets in your area

National Grid has identified the following high voltage underground electricity transmission cables as falling within the Neighbourhood area boundary:

- **Underground cable – City Road to St Johns Wood 1**

Nicholls House
Homer Close
Leamington Spa
Warwickshire CV34 6TT
United Kingdom
Tel +44 (0) 1926 439 000
woodplc.com

Wood Environment
& Infrastructure Solutions UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



- **Underground cable – City Road – St Johns Wood 2**

Gas Distribution – Low / Medium Pressure

Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com

Electricity distribution

Information regarding the distribution network can be found at: www.energynetworks.org.uk

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines:
<https://www.nationalgridet.com/document/130626/download>
- Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown overleaf to your consultation database:

Lucy Bartley

Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

Spencer Jefferies

Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

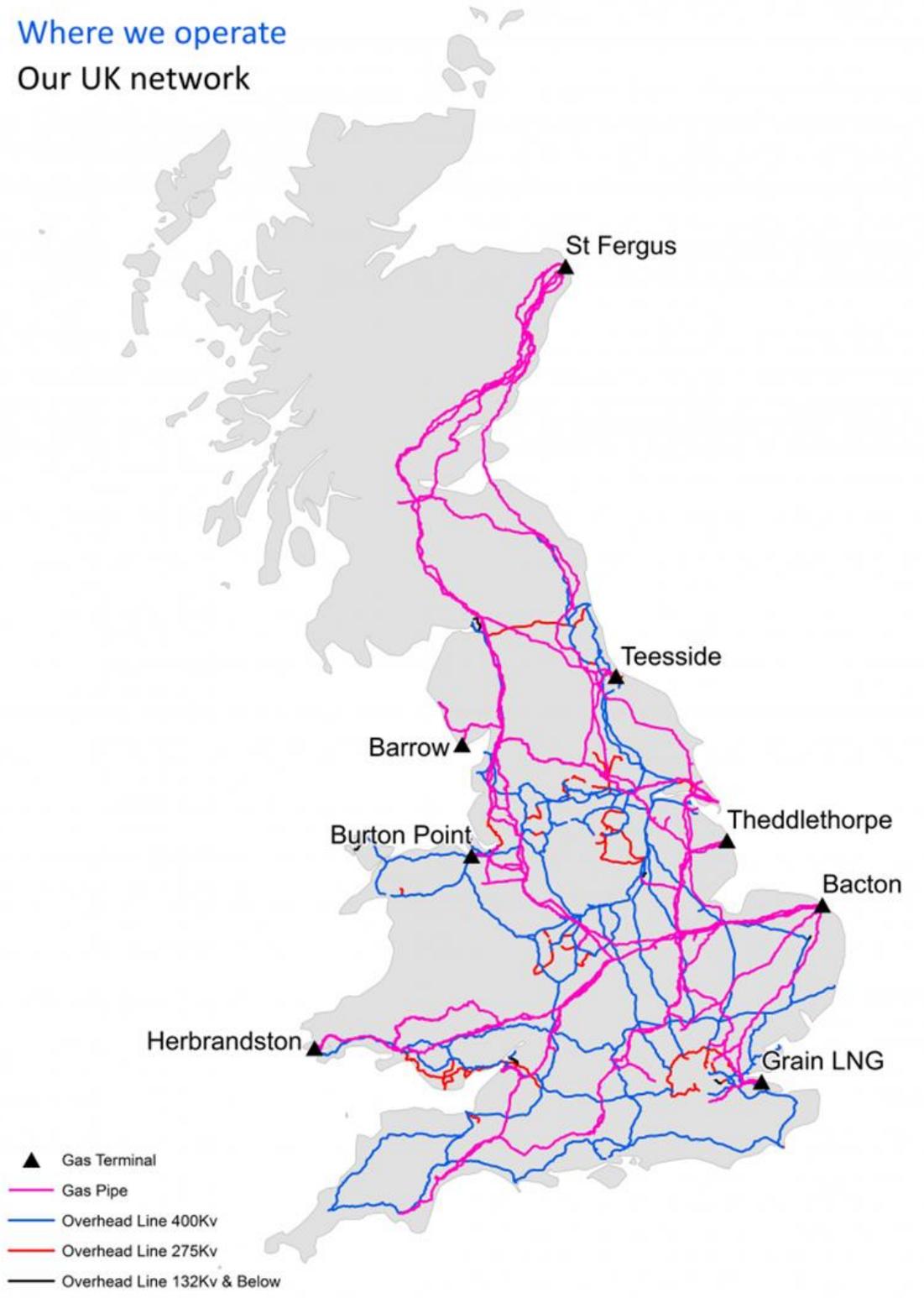
[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



Triggs, Andrew

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 24 October 2019 10:32
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan – REG 14
Attachments: 294802 Natural England Response Letter Camley Street Neighbourhood Plan - REG 14 N.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Reference: Camley Street Neighbourhood Plan – REG 14

Our Ref: 294802

Dear Sir or Madam

Thank you for your email requesting Natural England's consultation on the draft Camley Street Neighbourhood Plan – REG 14.

Please find attached Natural England's response to this request.

Kind regards

Sharon

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

Tel: 0300 060 3900

Fax: 0300 060 1544

www.gov.uk/natural-england

<mailto:consultations@naturalengland.org.uk>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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Date: 24 October 2019
Our ref: 294802
Your ref: Camley Street Neighbourhood Plan – REG 14



Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

planningpolicy@camden.gov.uk

T 0300 060 3900

Dear Sir or Madam

Camley Street Neighbourhood Plan – REG 14

Thank you for your consultation request on the above dated and received by Natural England on 12th September, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team

Triggs, Andrew

From: Nigel Homer [REDACTED]
Sent: 16 October 2019 10:10
To: PlanningPolicy
Subject: consultation Camley Street Neighbourhood Area

Follow Up Flag: Follow up
Flag Status: Flagged

I support the adoption of the Camley Street Neighbourhood Plan. Having lived in the area for 13 years I think it represents the best opportunity to meet the needs of residents, businesses and visitors. We need it to showcase sustainable and green living. It's time Camley Street ends its prime trait of being one of the ashtrays of Camden. PLEASE promote pedestrian and cycling over speeding white van drivers and the associated pollution. Thank you.

Nigel Homer
[REDACTED]

Triggs, Andrew

From: Peter Hulatt [REDACTED]
Sent: 19 October 2019 13:11
To: PlanningPolicy
Subject: I support the Camley Street Neighbourhood Plan

Dear Camden Planning Policy Team

I fully support the Camley Street Neighbourhood Plan and think it should be adopted.
I work in the Camley Street Plan Area.

Your name and postcode

Peter Hulatt

[REDACTED]

Sent from my iPhone

Triggs, Andrew

From: [REDACTED]
Sent: 21 October 2019 13:19
To: PlanningPolicy
Subject: I support the Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy

I support the aims, objectives and content of the Camley Street Neighbourhood Plan published on your website at: www.camden.gov.uk/camley-street-neighbourhood-forum

I believe it meets the 'basic conditions' requirement as set out in legislation. I also believe it is fully in harmony with Camden Borough Council's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development.

I look forward to reading the independent examiner's comments on the Plan and would like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Best regards
Peter McGinty

[REDACTED]

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For more info visit www.bullguard.com

Triggs, Andrew

From: [REDACTED]
Sent: 14 October 2019 18:02
To: PlanningPolicy
Cc: Tomlinson, Paul (Councillor); Khatoon, Samata (Councillor); Robinson, Roger (Councillor); secretary@CamleyStreet.org.uk
Subject: CAMLEY STREET NEIGHBOURHOOD PLAN

Follow Up Flag: Follow up
Flag Status: Flagged

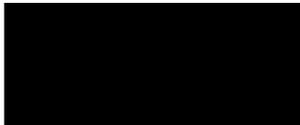
Dear Camden Planning Policy Team,

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. The aims of the Plan are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely,

Richard Cotton



Triggs, Andrew

From: Info [REDACTED]
Sent: 21 October 2019 17:14
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

This is to confirm that Richmond Laundries of 9 & 29 Cedar Way Industrial Estate Camden, fully support the Camley Street Neighbourhood Plan submitted for consideration to Camden Council.
Richmond Laundries has been established on the estate it proudly resides in for the past 23 years and has serviced the high demands of the hospitality industry in London since its inception in 1992. The location has been paramount to our growth year after year and is a unique element of our business success.

We do hope you find the Camley Street Neighbourhood Plan suitable for the unique opportunity Camden Council has to create the first mixed use project of its kind in the UK and lead the way for other councils to replicate in the future.

Kindest regards

RL Management

Admin Office
[REDACTED]



Head Office/ Central London Processing Facility

9 & 29 Cedar Way Ind Est, Camley Street
London
N1C 4PD

W: www.richmondlaundries.co.uk
E: enquiries@richmondlaundries.co.uk

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Triggs, Andrew

From: Rob Small [REDACTED]
Sent: 21 October 2019 21:08
To: PlanningPolicy
Subject: camley street

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team,

As a local resident I would like to offer my full support and praise for the Camley Street Neighbourhood Plan which has been submitted to Camden and I hope you will green light it.

After all the massive developments that has gone on in the area behind Kings Cross, one that has a more human face seems very essential. I also believe this one to be fully in harmony with Camden's, the Greater London Authority's, and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development.

I look forward to reading the independent examiner's comments on the Plan, and I would like to be informed of the Council's decision on the examiner's recommendations.

I would also be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

Rob

Rob Small
[REDACTED]

Triggs, Andrew

From: sara <[REDACTED]>
Sent: 26 October 2019 19:07
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan Area (Barker Drive).

Sara Royo
[REDACTED]

Sent from my iPhone

Triggs, Andrew

From: Fred Drabble [REDACTED]
Sent: 25 October 2019 18:05
To: PlanningPolicy
Cc: Chris Shaw; Austin Callison
Subject: Camley Street Neighbourhood Development Plan
Attachments: SCL Comments on draft Camley NDP 25.10.19 FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam

Please see attached comments on the proposed Submission Version of the Camley Street Neighbourhood Development Plan in response to the current consultation, which are submitted on behalf of the clients of Shaw Corporation Limited.

Kind regards

Fred Drabble MRTPI MRICS



42 Langham Street
London W1W 7AT

[REDACTED]
W: www.shawcorporation.com

PA: Jackie Cramphorn | E: jcramphorn@shawcorporation.com

NLA Winners 2015 + 2016 | RTPI Finalist 2015 | Camden Business Awards 2017



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Camley Street Neighbourhood Development Plan (2018 - 2033) (Submission Version) – Representations on behalf of the clients of Shaw Corporation Limited – 25 October 2019

Introduction

Thank you for the opportunity to comment on the Camley Street Neighbourhood Development Plan (2018 - 2033) (Submission Version). We write on behalf of the clients of Shaw Corporation Limited (SCL), including the Regent group of companies that continue to successfully facilitate and deliver the developments at 101, 102 and 103 Camley Street.

These comments follow our comments on the Pre-Submission Version, submitted in January 2019. Whilst we share some of the core objectives for the continued regeneration of Camley Street, we are extremely concerned that the majority of our previous concerns and objections, as well as those of others including the Council, have been ignored in the publication of the Submission Version. Indeed, our comments and concerns are not reflected in the precis of the Regulation 14 Consultation Responses provided on pages 16-17 of the document. Given the clear conflict with the Council's own adopted planning policies, we fail to see how the Submission Version can be found to be sound. We therefore strongly object to the Submission Version.

We set out below our comments on the document, including where we continue to support some of the shared objectives, but also where we maintain our objections.

Context

The Camley Street Neighbourhood Forum (CSNF) will be aware that SCL worked closely with the London Borough of Camden (LBC), the Greater London Authority (GLA) and the local community including local residents and businesses to successfully masterplan 101, 102 and 103 Camley Street. 103 Camley Street is complete and operational, whilst 101 and 102 Camley Street are under construction (102 Camley Street is in the process of being occupied). Together these developments were recognised by LBC as forming an important new southern 'gateway' into Camley Street, creating links to the Regents Canal for pedestrians and cyclist; public access to these sites; and establishing routes to provide linkages both within the Camley Street area, and to benefit the wider context and future schemes.

In considering the merits of these developments, LBC recognised that the existing sites were underdeveloped and failed to make the most efficient use of land. The trio of consented developments deliver significant benefits to the area that act as a catalyst for future regeneration of Camley Street and have therefore helped to set the context for the emerging Neighbourhood Development Plan. These significant benefits include the following, a number of which align with the stated strategic vision of the Neighbourhood Development Plan:

- An Enterprise Incubator to potentially create 300 or more new enterprises a year to be leased to UCL and operated jointly by UCL and CTU (Camden Town Unlimited – the Camden Town BID)
- A combined total of approximately 41,100 sq. ft. gross commercial floorspace at 101 and 102 Camley Street for small and medium sized enterprises including affordable workspace and therefore potential 'move on' space for new businesses emerging out of the Incubator and from the Collectives in Camden Town, UCL Advances and Camden's various Higher Education Institutions (HEIs)

- Over 300 new homes, including 67 affordable homes, 40 private homes for rent only and a large proportion of family homes, helping to create a mixed and balanced community with social diversity
- 350 student rooms for Camden's prestigious Universities and HEIs
- Retail shop let to the Co-op – the first local shop in the area, helping to serve local businesses and residents alike, including access to the shop by canal boat residents on Regents Canal – The draft Neighbourhood Development Plan recognises this as now vital to the local community
- Canal side café
- Significant public realm improvements along the Regents Canal towpath, including opening up the towpath and providing new cycle and pedestrian access in the form of new steps and a ramp from Camley Street (the new links at 102 and 103 Camley Street are now open)
- New landscaped public open space accessed from the Regents Canal towpath and Camley Street
- Provision for a new pedestrian footbridge, including step free access from canal level to Camley Street, further improving linkages

In recognition of the 'gateway sites' contribution to the local and London economy, together the schemes were awarded the prestigious 2015 NLA New London Award for "Best Mixed-Use Scheme" as well as being shortlisted for an RTPI Award for Planning Excellence 2015 in the category for "Creating Economically Successful Places".

With this background, SCL is well placed to comment on the emerging Neighbourhood Development Plan.

The Vision for Camley Street and Core Objectives – Areas of Support

We support a number of the strategic objectives of the draft Neighbourhood Development Plan and believe there is common ground in respect of the desire to make the most efficient use of the available sites on Camley Street and unlock the benefits of redevelopment, particularly given the proximity of these sites to Kings Cross and the Knowledge Quarter. We support the following key issues and strategic proposals of the draft Neighbourhood Development Plan:

- Recognising that the opportunities and potential benefits that new development could bring should also benefit residents and businesses who already live and work in the area
- Providing opportunities for existing and new businesses to grow and flourish
- Deliver new, innovative, mixed-use building typologies that allow existing and new employment uses to co-exist, whilst enabling the successful intensification of a particular site
- Provide new, high-quality dwellings offering genuinely affordable homes as part of new mixed-use building typologies

- Provide flexible uses that are suitable for a wide range of small and large companies, including affordable workspaces for a range of small businesses
- Recognising 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 (Policy CS DQ3)
- 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 and engender and sustain a sense of community
- Providing the social infrastructure required to improve well-being and quality of life across the neighbourhood, accessible to all residents
- Improving the quality and range of green spaces across the neighbourhood, including green linkages and permeability through the Camley Street sites, which 101, 102 and 103 Camley Street have begun to facilitate
- Improving the quality of the local environment in terms of design, landscape improvements and pedestrian and cyclist comfort and accessibility

We trust the CSNF recognises that the Camley Street Gateway Sites (101, 102 and 103 Camley Street) together deliver on a number of these stated objectives and proposals.

Concerns and Objections

Whilst we therefore support a significant number of the stated vision proposals and core objectives, we make the following more specific comments as well as raise several concerns:

Policy / Paragraph	Comment
Core Objective 1: Employment	<p>We agree that development should ensure the neighbourhood's continued function as a place of employment but disagree with the specific emphasis on light industrial, although acknowledge that there is an intention to create new space for "other commercial occupiers".</p> <p>The adopted Local Plan states that the key emerging priorities for the Camley Street area include "creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town" and "making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and <u>employment floor space</u>".</p> <p>The Local Plan vision for Camley Street does not state that new employment space need be "light industrial", and indeed in building on Camley Street's location adjacent to King's Cross Central and close to Camden Town as well as the Knowledge Quarter, there should be greater emphasis in Core Objective 1 and throughout the document on a range of employment including educational uses. This is not to say developments cannot innovatively incorporate flexible</p>

	<p>commercial spaces capable of accommodating light industrial, studio and maker spaces.</p> <p>We support the statement that 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 – this has been successfully incorporated at 101, 102 and 103 Camley Street. Likewise, the promotion of working from home or providing opportunities for residents to find places to work within the development.</p>
<p>Policy CS EM1 and EM2</p>	<p>We disagree with the specific requirement that development must ensure that the amount of existing <u>B1(c)</u> light industrial employment floor space and <u>B8</u> storage and distribution space present on a site is, as a minimum, maintained and preferably increased.</p> <p>The Cedar Way Industrial Estate is not a Strategic Industrial Location. As the CSNF recognises in its introductory text, the Neighbourhood Development Plan needs to be consistent with the adopted Local Plan. The relevant policy here is E2. Paragraph 5.34 of the adopted Local Plan states that regarding Policy E2, the terms ‘business’ and ‘employment’ are used to refer to the uses in B use class and other unclassified uses of similar nature. Although Policy E2 states that LBC will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided the level of employment floorspace is increased or at least maintained, this is not specifically restricted to B1c and / or B8 as proposed by draft Policy CS EM1.</p> <p>We do not disagree with the intention that redevelopment retains existing businesses on site <i>as far as possible</i>, and in particular industry, light industry, and warehouse / logistic uses that support the functioning of the CAZ or the local economy, as this is consistent with the Local Plan. However, as drafted, both Policies CS EM1 and EM2 are rigidly restrictive.</p> <p>Planning policy should be flexible to changing market circumstances, and so the draft Neighbourhood Development Plan should mirror the Local Plan by acknowledging that the existing businesses premises may be redeveloped for non-business use where the site or building is no longer suitable for its existing business use; and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been explored over an appropriate period of time.</p> <p>Policy should also acknowledge that there may be circumstances where continued industrial use may not be compatible with other planned uses and aspirations for the regeneration of the area and / or wider planning benefits of a particular development.</p> <p>Whilst we have supported the inclusion of affordable workspace within the Camley Street Gateway redevelopments, we strongly disagree with the statement at EM1 that “<i>development must ensure that any new B1(c) (light-industrial) floor space</i></p>

	<p><i>provided is charged at average Greater London rental rates at the time of development”.</i></p> <p>We also strongly object to the requirements at EM2 where it is stated that “<i>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</i>”; and “<i>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</i>”.</p> <p>It cannot be within the remit of a Neighbourhood Development Plan to set rental controls. The Local Plan states that proposals for higher intensity redevelopment of employment sites include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace <i>where viable</i>. The requirement that <u>any</u> new B1(c) (light-industrial) floor space provided is charged at average Greater London rental rates at the time of development is not provided for by the adopted Local Plan. Nor is there an absolute requirement to make an offer of equivalent replacement space as part of the business and industrial space provision in any redevelopment proposals to existing businesses, as the commercial terms need to be considered and understood. These requirements are overly market restrictive and do not reflect the flexibility offered by paragraph 5.44 of the Local Plan.</p>
Policy CS HO1	<p>The statement that all developments proposing a residential element will be expected to contribute to the borough’s affordable housing need by “delivering the maximum viable quantum of affordable housing” is consistent with the Council’s planning policies.</p> <p>However, draft Policy CS HO1 then states that this should be a minimum of 50% on publicly owned land, 35% on all other land and an aspiration of achieving 100%. This is contrary to the adopted Local Plan and should be amended.</p> <p>The Local Plan states that the Council will seek to negotiate the maximum reasonable amount of affordable housing from developments. An affordable housing target of 50% applies only to developments with capacity for 25 or more additional dwellings, and 50% is a “target”, not a “minimum”.</p> <p>Policy H4 states that in considering whether affordable housing provision should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate (including therefore whether a less than target provision is acceptable), the Council will take into account, amongst other criterion, the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and whether an alternative approach could better meet the objectives of this policy and the Local Plan.</p>

	<p>We do not consider that the Neighbourhood Development Plan can impose “minimum” affordable housing levels where its application is inconsistent with the Local Plan, including the sliding scale approach provided by the Local Plan. Policy CS HO1 should be amended to be consistent with the Local Plan.</p> <p>The reference to a minimum of 50% affordable housing on publicly owned land should be removed. The Mayor of London’s Viability SPG does set a higher affordable housing threshold of 50% on publicly owned land to qualify for the Fast Track Route, however this is different from requiring a minimum of 50% affordable housing on publicly owned land. The Mayor of London’s higher threshold for the Fast Track Route simply means that development on publicly owned land may be subject to more rigorous viability assessment in determining the maximum quantum of affordable housing that can be provided, rather than mandating a minimum provision of 50% affordable housing.</p> <p>Furthermore, the Mayor’s approach to the affordable housing ‘threshold’ on publicly owned land is explained in the separate Practice Note dated July 2018. This includes an explanation, amongst other caveats, that on some sites the freehold land interest may be in public ownership, whereas a private landowner may hold a long leasehold interest. In this instance control of the land is primarily in private hands. For these reasons, where the public sector land interest is in the form of a freehold or similar interest and a long leasehold is in place which is not held by the public landowner, the 35% threshold would apply in relation to the Fast Track Route. This context applies to much of Camley Street.</p> <p>The reference to a minimum of 50% affordable housing on publicly owned land should be deleted from the draft CSNF because the interpretation is inconsistent with Mayor of London policy and does not reflect the nuances of the application of the Mayor’s approach.</p>
Policy CS HO2	<p>We disagree that all proposals to redevelop single-use non-residential areas into mixed-use developments should provide at least 50% of all additional floorspace as self-contained housing.</p> <p>We also disagree that all proposals to redevelop commercial areas into mixed-use development should provide 50% of all additional floor space 1,000sqm or more as self-contained housing.</p> <p>Whilst we support the strategic objective of mixed-use development including new homes and note the wording of Policies H1 and H2 of the Local Plan, it is clearly overly restrictive to mandate that developments in these situations always provide half their floor area as self-contained housing without regard to site circumstances. This limits the contribution sites may make to other uses of public benefit, such as other employment, educational uses and community uses.</p> <p>As per the Local Plan, the supporting text should note that the Council will consider whether self-contained housing is required as part of a mix of uses taking into account the character of the development and site circumstances etc.</p>

Policy CS HO3	<p>We agree with the support offered by the draft Neighbourhood Development Plan for student accommodation integrated into mixed-use development that includes accommodation for other residents.</p> <p>We disagree however with the restrictions at a-e of Policy HO3 and do not consider that this approach is consistent with the Council's policies, in particular the restriction that at least 90% of new housing should be provided as permanent self-contained homes (use class C3).</p> <p>Policy H9 of the Local Plan states that the Council will seek a supply of student housing to <u>meet or exceed</u> Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development meets the criteria at a-j of Policy H9.</p> <p>Camley Street is strategically positioned near higher education institutes and the Knowledge Quarter. Higher education institutes play a key role in Camden's economy and culture, and the draft Neighbourhood Development Plan should not seek to restrict student accommodation where this is inconsistent with the Local Plan and in particular at Camley Street where its strategic location lends itself to serve the higher education institutes and Knowledge Quarter through the provision of student accommodation.</p> <p>There is an opportunity for Camley Street to provide links to the higher education institutes and for these establishments to form a positive part of the Neighbourhood Plan area. Greater emphasis should be placed in the Neighbourhood Development Plan on the opportunity to provide higher educational and university facilities at Camley Street (i.e. not just student housing but other teaching and associated facilities).</p>
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In summary, some of the CSNF's proposals and strategic objectives are supported. We consider that the redevelopment of the Camley Street 'Gateway Sites' at 101, 102 and 103 Camley Street already help to facilitate a number of these strategic objectives. However, we consider that there are detailed policy points proposed by the draft Neighbourhood Development Plan that will cumulatively render much of the regeneration of Camley Street unviable, and there needs to be greater flexibility in the proposed detailed policy application. Many of these policies are inconsistent with Camden and Mayoral planning policy and cannot be sound. Examples include the cumulative impact of requests for predominance of light industrial space, business space rental restrictions mandated affordable housing requirements and restrictions on student housing.

We trust that these comments will be considered by the CSNF and its advisors and the London Borough of Camden. We would be grateful if you could keep SCL advised as the Neighbourhood Development Plan progresses.

Triggs, Andrew

From: Shirley Richmond [REDACTED]
Sent: 21 October 2019 10:47
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camley Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan Area.

Yours sincerely

Shirley Richmond
[REDACTED]

Sent from my iPad

Triggs, Andrew

From: Planning South [REDACTED]
Sent: 16 September 2019 14:58
To: PlanningPolicy
Subject: RE: Camley Street Neighbourhood Plan consultation

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Admin Team



E: Planning.south@sportengland.org



Triggs, Andrew

From: stefania gatta [REDACTED]
Sent: 26 September 2019 15:48
To: PlanningPolicy
Subject: CAMLEY STREET NEIGHBORHOOD DEVELOPMENT PLAN

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madame

I work at postal code NW1 8SR and I agree with the Camley Street Neighborhood Development Plan because I support the building of 100% affordable housing and the retention of the existing local employment.

Kind regards

Stefania Gatta

Triggs, Andrew

From: [REDACTED]
Sent: 19 October 2019 14:05
To: PlanningPolicy
Subject: Camley Street neighbourhood plan

I am a resident of Elm Village and have been aware of this proposal for a number of years. I wish to register my support for the project.

Stella Timmins

[REDACTED]

Triggs, Andrew

From: Stephen Gane [REDACTED]
Sent: 26 October 2019 22:45
To: PlanningPolicy
Subject: Fwd: Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

> Dear Camden Planning Policy Team,

>

> I support the Camley Street Neighbourhood Plan and think it should be adopted. I live in the Camley Street Plan Area (Barker Drive).

>

> Stephen Gane
[REDACTED]

Triggs, Andrew

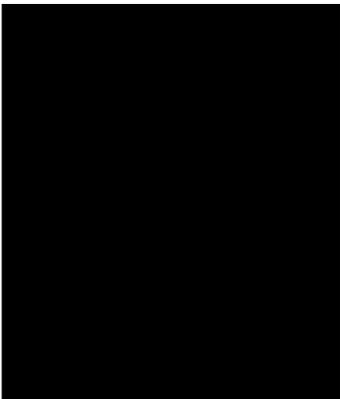
From: Susan Cokyll [REDACTED]
Sent: 21 October 2019 10:30
To: PlanningPolicy
Subject: I support the Camley Street Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy Team

I support the Camley Street Neighbourhood Plan and think it should be adopted.
I live in the Camley Street Plan Area.

Susan Cokyll



Triggs, Andrew

From: Terry Furby [REDACTED]
Sent: 20 September 2019 13:14
To: PlanningPolicy

Follow Up Flag: Follow up
Flag Status: Flagged

- I agree with the Camley Street Neighbourhood Development Plan because I support the retention of the existing businesses and their varied employment



Sent by email: planningpolicy@camden.gov.uk

thameswaterplanningpolicy@savills.com



0118 9520 503

24 October 2019

London Borough of Camden – Camley Street Neighbourhood Development Plan – Submission Version

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the London Borough of Camden and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the draft Neighbourhood Plan:

General Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the Revised National Planning Policy Framework (NPPF), February 2019, states: **“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”**

Paragraph 28 relates to non-strategic policies and states: **“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”**

Paragraph 26 of the revised NPPF goes on to state: **“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”**

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that: **“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).**

New Charging Schedule

For information, the way water and wastewater infrastructure will be delivered has changed. From the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local

reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

Specific Comments

In light of the changes which took effect in April 2018, and which are set out above, and as the sites are currently not allocated in the Local Plan, we would request that a paragraph is included in the Neighbourhood Plan which states:

“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

Thames Water encourages developers to use our free pre-planning service (<https://www.thameswater.co.uk/preplanning>). This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't.

The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.”

We hope this is of assistance. If you have any questions please do not hesitate to contact Carmelle Textor on the above number.

Yours sincerely

Thames Water Utilities Ltd

Triggs, Andrew

From: Thomas Bailly [REDACTED]
Sent: 25 October 2019 13:09
To: PlanningPolicy
Subject: Support for the Camley St Neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Camden Planning Policy team

As a resident of the Camley St Plan Area, I'd like to express my support for the Camley St Neighbourhood plan. I believe the Plan provides an adequate and thoughtful approach to affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development.

I look forward to seeing the independent examiner's comments, and should like to be informed on the Council's decision on the examiner's recommendations.

Yours sincerely
Thomas Bailly

[REDACTED]

Triggs, Andrew

From: Winnie Wong [REDACTED]
Sent: 20 October 2019 23:12
To: PlanningPolicy
Subject: Camley Street Neighbourhood Plan

Dear Camden Planning Policy Team

I write to confirm that I do believe that the Camley Street Neighbourhood Plan as submitted to Camden meets the 'basic conditions' requirement as set out in legislation. I thus, support the Camley Street Neighbourhood Plan and think it should be adopted.

I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations. I would be willing to participate in a public hearing should the examiner decide to hold one.

I live/work in the Camley Street Plan Area.

Yours sincerely

Winnie Wong
[REDACTED]

Triggs, Andrew

From: PlanningPolicy
Sent: 04 November 2019 11:55
To: Triggs, Andrew
Subject: FW: Camley Street Neighborhood Plan

Hi Andrew,

Please see below an additional comment on the Camley Street Neighbourhood Plan.

I have responded and will file now.

AK

From: Bec Hill [REDACTED]
Sent: 02 November 2019 11:57
To: PlanningPolicy <PlanningPolicy@camden.gov.uk>
Subject: Camley Street Neighborhood Plan

Dear Camden Planning Policy Team,

I support the Camley Street Neighbourhood Plan and think it should be adopted. I have lived in the Camley Street Plan area for 10 years (5 years at 133 Weavers Way and 5 years and counting at [REDACTED])

I write to confirm that I believe the Camley Street Neighbourhood Plan as submitted to Camden meets the "basic conditions" requirement as set out in legislation. The aims of the area are, I believe, fully in harmony with Camden's, the Greater London Authority's and the UK government's policies with regard to such matters as affordable housing, the maintenance of a diversity of employment in London, and the urgent need for sustainable and environmentally responsible development. I look forward to reading the independent examiner's comments on the Plan in due course, and I should like to be informed of the Council's decision on the examiner's recommendations.

I would be willing to participate in a public hearing should the examiner decide to hold one.

Yours sincerely

Rebecca Hill
[REDACTED]
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Comedian / Presenter / Doodler
bechillcomedian.com

