

# INDEPENDENT EXAMINATION OF THE CAMLEY STREET NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

John Richmond  
Secretary of the Camley Street Neighbourhood Forum

Andrew Triggs  
London Borough of Camden

Examination Ref: 02/JK/CSNP

28 November 2019

Dear Mr Richmond and Mr Triggs

## CAMLEY STREET NEIGHBOURHOOD PLAN EXAMINATION

After reading the Neighbourhood Development Plan (NDP) and its supporting evidence including the responses to the Regulation 16 consultation exercise, I have identified a number of matters which I request the Forum to consider further. At this stage, I recognise that there is significant support in the local community for the overall objectives and vision set out in the Camley Street NDP, with more than 50 responses to the Regulation 16 consultation exercise commenting favourably on the Plan.

However, a number of important issues were raised by Regulation 16 responses suggesting that key policies in the NDP may not meet the Basic Conditions for neighbourhood planning. Camden Council (the Council), the local planning authority for the area, commented that the NDP *“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”*. Nevertheless, the Council is among those who have raised objections to specific policies and other parts of the Plan, and have reinforced my view that some modifications to the NDP will be needed for it to satisfy the statutory requirements.

The following is a brief summary of the matters on which I wish to receive additional information from the Forum:

1. A number of respondents consider that Policies CS EM1: Employment Floorspace Provision and CS EM2: Retention of Existing Businesses are too restrictive. I note from the Consultation Statement that “where feasible” was added to a number of the policy criteria, in response to earlier criticisms, but I am not satisfied that this overcomes the specific and detailed questions raised about the policy requirements. There are allegations that the policies lack general conformity with the development plan and fail to meet the Basic Conditions. Is the Forum able to suggest revised policy wording to address these issues? *(Recent comments of particular relevance were made by Camden Council – as a local landowner and as the local planning authority, the Mayor of London, CBREGI, Nicholas Taylor and Associates for Fraserview Investments Limited, Shaw Corporation Limited, and Savills plc for Metropolitan Properties, as well as Camden Town Unlimited, Anne Wooding and Gary Baverstock).*
2. My attention was drawn to work being carried out by Camden Council to produce a Masterplan for Camley Street and Supplementary Planning Guidance. What is the Forum’s view on the lack of alignment between these emerging documents and the NDP, and how

might these emerging new documents be suitably referenced (*for example on Page 28 of the NDP*)?

3. What is the Forums view in respect of Policies CS HO1: Affordable Housing Provision and CS HO2: Residential Provision within Mixed Use Development, given the concerns raised around issues with the general conformity with the Local Plan, and with the New London Plan? (*Regulation 16 responses from Camden Council, the Mayor of London, Metropolitan Properties, Shaw Corporation Limited, CBREGI, and Camden Town Unlimited include detailed comments and proposed changes*).
4. Camden Cycling Campaign and the Canal and River Trust seek modifications relating to Sustainable Transport, Green Infrastructure and Design Quality. Historic England and the Mayor of London are critical of Policy CS DQ3: Proposals for Tall Buildings, for a lack of clarity and potential impact assessment. How might the NDP be modified to address these concerns?
5. The Council argued that the section dealing with Local Community and Social Needs did not distinguish between community facilities and commercial premises, and this could make the policy inoperable. How might Policy CS CSN1 be modified?
6. The Council included comments on the clarity and accuracy of the content of the NDP, beginning with Figure. 1, which does not identify all the land in which the Council has a freehold interest. It would assist the examination if the Forum would put forward any factual corrections to ensure that the Plan would be used effectively.

I would be grateful for a response to these questions within **3 weeks** of receipt of this letter.

Subject to the response I receive from the Forum, the next stage may potentially necessitate the Forum consulting Camden Council's planning department, and possibly other organisations who have raised objections to aspects of the NDP, with a view to the production of a Statement of Common Ground.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter is placed on the Camley Street Neighbourhood Forum and Local Authority websites.

Thank you in advance for your assistance.

Your sincerely

*Jill Kingaby*

Examiner