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# **Report on Camley Street Neighbourhood Development Plan 2019-2034**

**An Examination undertaken for London Borough of Camden Council,  
with the support of the Camley Street Neighbourhood Forum, on the July  
2019 submission version of the Plan.**

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## **Main Findings - Executive Summary**

From my examination of the Camley Street Neighbourhood Development Plan (the Plan/CSNDP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Camley Street Neighbourhood Forum (CSNF);
- The Plan has been prepared for an area properly designated – the Camley Street Neighbourhood Area as shown on Figure 1;
- The Plan specifies the period to which it is to take effect – 2019-2034; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### *Camley Street Neighbourhood Development Plan 2019-2034*

1.1 The area covered by the Plan contains Camley Street at its centre. This main road extends from Goods Way, serving St Pancras International and King's Cross railway stations in the south, to Agar Grove in the north. Regent's Canal also crosses the Plan area, forming much of the area's north-western and south-eastern boundaries. As observed in the Plan, the Camley Street area is isolated by the strategic transport links of the Regent's Canal and railway lines, yet it is within a short distance of the centre of London and the area around King's Cross which is undergoing significant change.<sup>1</sup> The Camley Street area accommodates a small number of residents (just over 1,000 according to the 2011 Census) and a cluster of small businesses (notably along Camley Street and Cedar Way and beside the railway lines), many of which supply Central London's economy. The southern part of the Plan area contains part of the Regent's Canal designated Conservation Area with a number of listed buildings and other heritage assets. In addition to Regent's Canal which

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<sup>1</sup> Camden Local Plan – paragraph 2.21 shows London Plan targets for Camden's growth areas: King's Cross Opportunity Area – 1,900 (minimum homes 2011-31) and 25,000 (indicative jobs 2011-31).

is a designated Green Chain and Corridor and Site of Metropolitan Importance for Nature Conservation, the area includes Camley Street Natural Park, a designated Local Nature Reserve.

- 1.2 The CSNF was designated in February 2014 and re-designated in May 2019 by the London Borough of Camden Council (Camden Council/the Council), to take forward the production of a neighbourhood development plan for the area. The Forum set its objective for the Plan to make the neighbourhood: “*an area that’s economically vibrant, socially connected and secure the greenest, safest place to live and work it possibly can be*”.<sup>2</sup> The submitted Consultation Statement sets out a timeline of key events from 2012 onwards, when a small group of business representatives first met to discuss the potential for neighbourhood planning in the Camley Street area. Meetings and events organised by the Forum focussed initially on ‘area designation’, then on ‘evidence base consultation’, leading in 2016 to ‘producing the draft neighbourhood plan’ and thereafter in 2018 and 2019 to informal and regulatory consultation with the community.

#### *The Independent Examiner*

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the CSNDP by Camden Council, with the agreement of the CSNF.
- 1.4 I am a chartered town planner and former government Planning Inspector, with previous experience examining neighbourhood plans within London and elsewhere in England. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

#### *The Scope of the Examination*

- 1.5 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

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<sup>2</sup> Camley Street Neighbourhood Development Plan (2019-34) Draft – Consultation Statement.

1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:

- Whether the Plan meets the Basic Conditions;
- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development';
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
  - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### *The Basic Conditions*

1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;

- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>3</sup>

## **2. Approach to the Examination**

### *Planning Policy Context*

2.1 The Plan area is located within the London Borough of Camden. The Development Plan, not including documents relating to excluded minerals and waste development, comprises the London Plan [2016] and the London Borough of Camden Local Plan [2017]. The Mayor of London published a draft new London Plan for consultation in December 2017, which has been examined by a panel of Inspectors. The Inspectors issued their report and recommendations to the Mayor of London in October 2019. The Mayor issued his intention to publish the new London Plan to the Secretary of State on 9 December 2019, with a statement of reasons for any of the Inspectors' recommendations which the Mayor does not wish to accept. Publication of the final London Plan is expected in March 2020.

2.2 The emerging new London Plan is not yet part of the Development Plan for the Camley Street area, with which the Basic Conditions for neighbourhood planning require general conformity with its strategic policies. However, national Planning Practice Guidance (PPG)<sup>4</sup> advises that the reasoning and evidence informing an emerging plan may be relevant to the consideration of the Basic Conditions against which a neighbourhood plan is tested. Recognising that the draft London Plan has reached an advanced stage of preparation and is close to adoption, I have taken it into account in my examination in accordance with the advice in the PPG.

2.3 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The PPG offers guidance on how this

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<sup>3</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

<sup>4</sup> PPG Reference ID: 41-009-20190509.

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policy should be implemented. A revised NPPF was published on 19 February 2019, and all references in this report are to the February 2019 NPPF.<sup>5</sup>

### *Submitted Documents*

- 2.4 I have considered all policy, guidance and other reference documents which I consider relevant to the examination, including those submitted which comprise:
- the CSNDP 2019-2034, submission version [July 2019];
  - Figure 1 of the Plan (as modified and referenced in the Appendix to this report), which identifies the area to which the proposed Neighbourhood Development Plan relates;
  - the Consultation Statement, [August 2019];
  - the Basic Conditions Statement, [June 2019];
  - all the representations that have been made in accordance with the Regulation 16 consultation;
  - the Strategic Environmental Assessment (SEA) Screening Opinion prepared by Camden Council, November 2018;
  - the Habitats Regulations Assessment (HRA) Screening Opinion prepared by Camden Council, November 2018;
  - the Equalities Impact Assessment prepared by Camden Council [March 2019];
  - Camley Street Neighbourhood Plan Viability Study, April 2018; and
  - the request for additional clarification sought in my letter of 28 November 2019 and the responses dated 19 December 2019 provided by the Forum and 10 January 2020 provided by Camden Council Planning Services.<sup>6</sup>

### *Site Visit*

- 2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 18 November 2019 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

### *Written Representations with or without Public Hearing*

- 2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to a referendum.

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<sup>5</sup> See paragraph 214 of the NPPF. The Plan was submitted under Regulation 15 to the local planning authority after 24 January 2019.

<sup>6</sup> All the documents referred to in this list are on Camden Council's web site.

View at: <https://www.camden.gov.uk/web/guest/camley-street-neighbourhood-forum>

- 2.7 As indicated above, on 28 November 2019 I wrote to the CSNF requesting answers to a number of questions arising from my reading of the consultation responses. The CSNF replied on 19 December 2019 and Camden Council Planning Services on 10 January 2020, providing additional information which has assisted my examination. A number of consultees stated that they would be willing to participate in public hearings, should the examiner decide to hold them. I am grateful for these offers, but have concluded that hearings would be unnecessary.

#### *Modifications*

- 2.8 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

### **3. Procedural Compliance and Human Rights**

#### *Qualifying Body and Neighbourhood Plan Area*

- 3.1 The CSNDP has been prepared and submitted for examination by the CSNF, which is a qualifying body for an area that was designated by the London Borough of Camden Council on 21 February 2014. After 5 years in operation, the Forum re-applied to continue its designation. The Council consulted local residents and other stakeholders in Spring 2019, receiving 30 responses. The area was re-designated on 10 May 2019.
- 3.2 It is the only Neighbourhood Plan for the Camley Street area, and does not relate to land outside the designated Neighbourhood Plan Area.

#### *Plan Period*

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2019 to 2034.

#### *Neighbourhood Plan Preparation and Consultation*

- 3.4 Consultation with local residents and businesses began in 2012, with invitations to a Wassailing party in February 2013. About 100 people attended and agreed informally to proceed with the production of a neighbourhood plan. The first meeting with Camden Council's planning officers took place in April 2013. Consultation on the Forum's constitution and area designation began in October 2013.
- 3.5 Following designation of the area and the CSNF in 2014, evidence gathering began and drop-in events were held for local people to discuss

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and comment on the identified key topics for planning the area's future. An initial draft Neighbourhood Plan was sent to Camden Council for comment in March 2016. A revised draft was published on the Forum's website in May 2017, and an open discussion event with residents, businesses and professional architects was held in January 2018.

- 3.6 A refined draft Plan underwent publicity and consultation in accordance with Regulation 14<sup>7</sup>, between November 2018 and January 2019. Some 115 responses were received from residents, business, local employees, landowners and other stakeholders including statutory bodies. Final revisions were made to the CSNDP between January and May 2019 in order to produce the submission version of the Plan, in July 2019. Consultation under Regulation 16 was undertaken between September and October 2019. Some 74 responses were received, and I have taken account of them in examining the Plan.
- 3.7 I have had regard for the comment on behalf of Frasersview Investment Limited that not all landowners were openly consulted on the CSNDP. However, Frasersview submitted a detailed consultation response at the Regulation 16 stage, as did Camden Council, Asset Strategy and Valuations (LBC ASV) section, which is a major local landowner. I am satisfied that the consultation process has been sufficiently extensive and wide-ranging, and has enabled interested landowners to make comments on the emerging Plan. The consultation process has met the legal requirements, complying with the defined procedures and has had regard for the advice in the Government's PPG for neighbourhood planning.

#### *Development and Use of Land*

- 3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

#### *Excluded Development*

- 3.9 The Plan does not include provisions and policies for 'excluded development'.

#### *Human Rights*

- 3.10 Camden Council has not alleged that the CSNDP would breach Human Rights (within the meaning of the Human Rights Act 1998). The Council carried out an Equalities Impact Assessment of the Plan which concluded that, overall, it provided a positive vision for the neighbourhood and was likely to promote social, economic and environmental wellbeing for most

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<sup>7</sup> The 2012 Regulations.

in the community. From my independent assessment, I am satisfied that the Plan will not breach human rights.

#### **4. Compliance with the Basic Conditions**

##### *EU Obligations*

- 4.1 The Neighbourhood Plan was screened for SEA by Camden Council, which found that it was unlikely to have significant environmental effects. The statutory consultation bodies, Historic England, Natural England and the Environment Agency agreed with Camden Council. Having read the Strategic Environmental Assessment Screening Opinion, I support this conclusion.
- 4.2 The CSNDP was further screened for HRA, which found that the Plan is likely to have some positive environmental outcomes. This is by virtue of the attention it gives to improving green infrastructure and the public realm within the Camley Street area, although the impact of the Plan on the Natura 2000 sites is considered most likely to be neutral. Based on my independent consideration on the information provided, I agree.

##### *Main Issues*

- 4.3 My assessment of the CSNDP's compliance with the Basic Conditions is set out under two main headings:
- General issues of compliance of the Plan, as a whole; and
  - Specific issues of compliance of the Plan policies.

##### *General Issues of Compliance*

- 4.4 The CSNDP is a clearly structured document which is relatively easy to read and comprehend. The introduction describes the Camley Street area, its current land uses and history, economic, demographic, transport and other characteristics. It refers to some strategic planning matters and mentions Camden's proposed Supplementary Planning Document (SPD) for the wider Camley Street Growth Area and King's Cross Opportunity Area (as identified in the London Plan 2012). It also describes the position of the Neighbourhood Plan within the planning policy hierarchy.
- 4.5 Section 2 of the Plan contains Figure 1 which illustrates the extent of the CSNDP area and the key current characteristics. It is self-evident, in my opinion, that Figure 1 illustrates existing land uses and I note the acknowledgement that land ownership boundaries are not exact. The area is undergoing change, however; for example, there has been recent

redevelopment at 101, 102 and 103 Camley Street. It seems appropriate to me to show these sites within the “mixed use areas” on Figure 1. However, Camden Council pointed out that the Figure does not accurately show all the land in its ownership. The Forum provided an amended Figure 1 which addresses this point, although I agree with Camden that (i) the key to Figure 1 should be modified to clarify that freehold and land ownership relate to employment sites, and (ii) the extent of Cedar Way industrial estate should be shown more clearly. A new Figure 1 should be substituted for the earlier map, as recommended in **PM1**.

- 4.6 In addition, I propose that the text in paragraph 2.12 should be modified, to state that part of the CSNDP area lies within the designated Regent’s Canal Conservation Area. Hence, any proposals for development within that area, which is illustrated on Figure 43 of the Plan, should pay special attention to preserving or enhancing the character or appearance of the area.<sup>8</sup> This modification, **PM2**, is needed so that regard is had for national planning policy, and so that readers and users of the Plan are fully aware of the status of the area.
- 4.7 Section 3 of the Plan sets out the key issues for the Plan area and explains how these key issues have been identified and refined over time, as a result of ongoing engagement with local residents and businesses. CSNDP proposals, listed on Page 18, follow logically from the assessment of key issues and lead on to the Vision for the future of the area. This is set out in section 4, and the six Core Objectives are given in section 5. Specific policies are addressed in section 6 under the Core Objectives. I support the approach linking the Vision to objectives and policies. However, I recommend that the first sentence of Core Objective 1: Employment is re-written to confirm that “the neighbourhood’s existing employment function and its role as a place that supports a diverse and rich mix of light industrial businesses will continue”. This modification, **PM3**, is needed for clarity<sup>9</sup> and to contribute to the achievement of sustainable development.
- 4.8 Metropolitan Properties Company Limited argued that the only realistic option for securing long-term benefits and meaningful regeneration of the area was through predominantly residential led development. It claimed that industrial redevelopment would not come forward on its own, and would need to be heavily subsidised by residential development. I appreciate the challenges which the Vision for Camley Street and its proposed spatial strategy will face, but given the expressed aims of the local community and the location of the area, close to London’s Central Activities Zone (CAZ), King’s Cross and the Knowledge Quarter, I shall not recommend changes to the Vision or thrust of the Core Objectives.

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<sup>8</sup> In accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

<sup>9</sup> PPG Reference ID: 41-041-20140306.

Providing the modifications described above are made, I conclude that sections 1-5 provide a clear context and rationale for the forthcoming policies in section 6.

- 4.9 I am satisfied therefore that, as proposed to be modified (and subject to the detailed modifications set out below), in general terms the Plan makes a contribution to sustainable development, is in general conformity with the strategic policies of the Local Plan and has regard to national policies and advice.

#### *Specific Issues of Compliance of the Plan Policies*

- 4.10 The introductory paragraphs to section 6 explain how the CSNDP's policies will be used in decision-making, once the Plan has been made. I appreciate that paragraph 6.1 is a brief summary of the Basic Conditions which neighbourhood plans have to meet. However, it is important that readers and users of the Plan have an accurate understanding as to how the CSNDP policies relate to Camden, London and national policies. Therefore, having regard for national policy, I propose to modify and extend paragraph 6.1, as in **PM4**.

#### *Employment (EM Policies)*

- 4.11 Policy CS EM1 sets out criteria for development which would involve the redevelopment of existing employment sites. The policy seeks to achieve the Plan's Core Objective 1, supporting the neighbourhood's existing employment function and the growth of a diverse and rich mix of light industrial businesses.
- 4.12 Fraserview, which has a long leasehold interest in 106 Camley Street, referred to a potential masterplan for nos. 104-136 Camley Street which make up the commercial core of the CSNDP area. Paragraph 2.69 of the Camden Local Plan acknowledges that the current employment premises in Camley Street fail to make the most efficient use of land. It adds, however, that the area's isolation and relative inaccessibility need to be addressed alongside any development change. Paragraph 2.71 of the Local Plan states that Camden Council will produce a Vision/Planning framework to guide growth and change in the area in future. Fraserview contend that the CSNDP is premature in the light of Camden Council's proposed new document and other work which will set out aspirations for the wider Camley Street growth area.
- 4.13 LBC ASV, in its Regulation 16 response, described progress on regeneration schemes for its land at 120-136 Camley Street and 3-30 Cedar Way. It referred to the Council's Community Investment Programme designed to boost new Council homes and jobs, and I note that the Key Diagram in the Local Plan shows Camley Street as a

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Community Investment Programme regeneration area. In response to my questions of 28 November 2019, the Forum reported that Camden Council's proposed SPD was timed to follow the submission of the CSNDP. Also, from reading the Canalside to Camley Street draft SPD, I appreciate that it will cover a wider area than the Camley Street area. The Forum has the opportunity to comment on the emerging SPD to secure its compatibility with the CSNDP. Camden Council helpfully pointed out that the SPD would be separate from the masterplan referenced by Frasersview, which would be produced by the Council as a landowner with adjacent landowners. I am therefore satisfied that the CSNDP is not premature, and consider that it should set out employment policies, so long as they are in general conformity with the strategic policies of the Camden Local Plan and meet the other Basic Conditions for neighbourhood planning.

- 4.14 The Forum explained that it does not intend to frustrate the potential of the existing employment sites to deliver additional uses and functions. However, businesses which have an important and symbiotic relationship with the CAZ should not be frustrated or removed from the area. Having regard for the draft new London Plan, I note that its Table 6.2 places the London Borough of Camden in the "retain capacity", where the loss of employment sites should be resisted and new development supported. Paragraph 6.4.4 of the draft London Plan states that more than 1,300 hectares of industrial land in the city was released to other uses between 2001 to 2015. Research indicates that there will be a positive new demand for industrial land in London between 2016 and 2041. Paragraph 2.72 of the Local Plan includes key emerging priorities for the Camley Street area, beginning with *"creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town"*. The last key priority is to make *"more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floorspace"*.
- 4.15 The Forum put forward revised wording of Policy CS EM1 in its letter to me, dated 19 December 2019. In brief, the amendments widen the scope of the policy encouraging B2 (general industrial) use as well as B1(c) and B8 uses. The revised wording also omits reference to "average Greater London rental rates", but seeks a proportion of floorspace to be provided at affordable rents, where viable. The Panel of Inspectors for the draft London Plan recommended the deletion of references to rents, because attempting to control rental levels of market properties is not justified or consistent with national planning policy. The revised Policy CS EM1 would, however, encourage small and medium-sized enterprises where feasible and a proportion of floorspace to be provided at affordable rents, where viable. It would also address concerns raised by the Council about the role of specialist advisers in managing affordable workspaces.

- 4.16 I broadly support the revised version of Policy CS EM1, but propose that some flexibility is introduced to meet the Council's observation that the policy would not always enable the decision-maker to consider the wider benefits of specific proposals, or permit development through "multi-site proposals", as described in paragraph 2.14 of the Local Plan. In its letter of 10 January 2020, the Council proposed changes to the Forum's amended version of Policy CS EM1 to (i) allow for circumstances where continuing use of an employment site is no longer suitable or viable; (ii) add flexibility to criterion b) to make it deliverable and applicable to large rather than all development proposals; (iii) remove the reference to "low-cost industrial and related...." space from criterion b) and rely on c) to address the policy for small and medium-sized enterprises. I agree that the policy should be modified to take account of these comments.
- 4.17 In my assessment of Policy CS EM1, I have also considered the emerging London Plan's Policies E2: Providing suitable business space; E3: Affordable workspace; E4: Land for industry, logistics and services to support London's economic function, and E7: Industrial intensification, co-location and substitution. With modifications, Policy CS EM1 should align with the draft London Plan policies. I recommend that Policy CS EM 1 and the supporting text in paragraph 6.4.1 are modified to reflect the Forum's and Council's proposed revisions, with minor wording changes from me to enable some flexibility, as shown in **PM5**. The modification is necessary for general conformity with strategic Policies E1 and E2 of the Local Plan and having regard for the NPPF's section 6: Building a strong, competitive economy. The modification should also contribute to the achievement of sustainable development.
- 4.18 CBRE Global Investors has an interest in 104 Camley Street and is exploring opportunities for the redevelopment of the site, shown on Figure 14 as DXC Technology. I see no reason to remove Figure 14, even though the site may undergo redevelopment in the future. Camden Council objected to Policy CS EM2 – Retention of Existing Businesses, because it seeks to guarantee that all existing businesses, if displaced, be found an alternative replacement site, ideally within the Camley Street area. I agree that it is not the role of planning policy to give such guarantees to specific businesses and that the policy, as proposed for modification by the Forum in its letter of 19 December 2019, does not have sufficient regard for this aspect of national planning policy.
- 4.19 Policy CS EM2 has also been criticised for implying that subsidised rents should be extended to the protected businesses listed in paragraph 6.7.7. The Council contends that protecting existing occupiers and setting rents will make it impossible to apply the Vision set for Camley Street in Policy G1 (Delivery and Location of Growth) of the Local Plan. The Forum put forward a revised Policy CS EM2 to address these concerns. However, I consider that the policy should be modified further, and in addition, the

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reference in the last sentence to “average Greater London rental levels”, should be removed.

- 4.20 Fairview Investment Limited raised the problem of continuity when redevelopment required existing businesses to move off-site prior to construction. It referred to a report from Camden Council in July 2019 regarding the redevelopment of 120-136 Camley Street and 3-30 Cedar Way, in which the Council proposed to develop a business support plan. This would work with existing businesses and help find alternative accommodation, possibly outside the Borough, with an opportunity to return and enter into new leases when new employment spaces were available. I consider it unnecessary to set this out in the CSNDP, but appreciate that a business support plan could assist the Forum in taking forward its employment policies and communicating with businesses. **PM6** shows modifications to the policy and supporting text which I recommend as necessary for general conformity with the strategic Local Plan policies, and having regard for national planning policy. I conclude that the Employment policies in the CSNDP will meet the Basic Conditions, as long as the above proposed modifications are made.

#### *Local Community and Social Needs (Policy CS CSN1)*

- 4.21 Policy CS CSN1- Social Infrastructure Provision, expects major development proposals to provide necessary community facilities/social infrastructure. Paragraph 6.8 defines “social infrastructure” as “*the provision and management of facilities that support social services which typically include: healthcare provision, educational uses, play and recreational facilities, public and civic facilities, and cultural and faith-based facilities*”. The supporting text then reports that nearly half of residents in the area, when surveyed in 2015, expressed dissatisfaction with the area’s retail offer. Paragraph 6.9.5 sets out key priorities for social infrastructure funding and includes the provision of new retail space, although retail is not included in the earlier definition of “social infrastructure”. I saw on my site visit that there are few shops in the area, apart from the Co-op supermarket and Camden Garden store. I appreciate that provision of new retail floorspace as part of a major development proposal, especially one that included new housing development, could benefit the area.
- 4.22 I am surprised that there is no reference to retail provision in paragraph 6.8.1. Section 8 of the NPPF, Promoting healthy and safe communities, describes community facilities “*such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, and other local services*”. I recommend that the first sentence in paragraph 6.8.1 is modified so that it has regard for the NPPF, and so that there is more consistency between sub-sections 6.8 and 6.9 of the CSNDP. I also note that paragraph 6.9.5 includes improved connections

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for pedestrians and cyclists, new bus-stops and improvements to the canal towpath as key priorities for the local community. Transport infrastructure is clearly a separate (if interrelated) matter to social infrastructure, and is addressed later in the Plan under Sustainable Transport. For clarity, a cross-reference to this section should be added to paragraph 6.9.5.

- 4.23 I understand the desire to protect social infrastructure provision, especially when significant redevelopment is undertaken. However, the final sentence of Policy CS CSN1 is very restrictive, and not in general conformity with the strategic policies of the Local Plan, notably Policies C3 Cultural and Leisure Facilities and C4 Public Houses. These policies and the supporting text recognise that, as times change, some facilities including identified community assets, will close or re-locate. I therefore recommend that some allowance is made in the CSNDP policy for the loss of facilities where exceptional circumstances can be demonstrated, so that general conformity with the strategic Local Plan policies is secured. **PM7** would achieve these modifications so that Policy CS CSN1 and its supporting text meet the Basic Conditions.

#### *Housing (HO Policies)*

- 4.24 The Mayor of London welcomed the proactive approach to housing delivery in the CSNDP. However, he contended that the Plan should set out a clear housing target for the neighbourhood area to contribute to Camden's 10 year housing target. If Camden Council is unable to provide a target for the area, the Mayor pointed out that the PPG advises the Forum to use the neighbourhood planning toolkit to derive one. In the Camley Street area, future delivery of new housing is expected to result from the re-use of brownfield sites and their more intensive, mixed use, redevelopment. I appreciate the difficulty of establishing a quantitative target for new housing in this neighbourhood, which already accommodates a large variety of land uses. Camden Council has not proposed that the Plan should include a target. I also note the following from the Government's PPG: The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated area, the neighbourhood body does not have to make specific provision for housing, or seek to allocate sites.<sup>10</sup> In this context, I shall not recommend that the CSNDP sets a specific housing target.

- 4.25 The first sentence of paragraph 6.10.1 refers to "*the identified mixed-use area on figure 40...*". However, Figure 40 highlights existing green spaces and does not show a mixed-use area. Figure 45 shows an area for mixed-use redevelopment on the east side of Camley Street, and paragraph

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<sup>10</sup> PPG Reference ID: 41-104-20190509.

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6.10.1 should therefore be amended to refer to Figure 45, as I propose in **PM8**.

- 4.26 Policy CS HO1 expects development proposals with a residential element to contribute to the Borough's affordable housing need. The Mayor of London welcomes the "*draft policy's move towards the threshold approach*" for affordable housing. This approach should limit the need for viability assessment to be undertaken for every housing development scheme, and should help delivery of much-needed new housing. However, I consider that the affordable housing criterion in the submission version of the CSNDP seeking "*a minimum of 50% on publicly owned land and 35% on all other land and an aspiration of achieving 100%*" differs from Policy H4 of the Camden Local Plan which includes 50% as a target for schemes of 25 or more dwellings, not as a minimum figure for all schemes. The Forum's submitted Viability Study updated in April 2018 explained that viability assessment is not an exact science; it involves high-level modelling and broad assumptions.
- 4.27 The Study concluded that the affordable housing target of 50% was ambitious but would not put development in the area at serious risk. It could require a developer's profits to fall below 20% of Gross Development Value, or could in some cases require a developer to seek a high proportion of intermediate products, rather than social-rented ones, to be built. Having regard for the observations made by the Shaw Corporation Limited, and Metropolitan Property Companies Limited, I accept that some sites may have particular constraints and be unable to deliver as much as 50% affordable housing. Combining light industrial and residential uses will require careful design with potentially costly mechanisms to separate the two (such as podiums). I consider that Policy CS HO1 should omit the word "*minimum*" from criterion a) and state that "*it aims for 50% on publicly owned land ....*". I agree that the policy should also differentiate between schemes for 25 or more dwellings and smaller schemes. This modification, **PM9**, would secure general conformity with Policy H4 of the Local Plan.
- 4.28 The "*desired affordable mix*" of 60% London affordable (or similar) rent and 40% London living rent (or similar) in Policy CS HO1 is in general conformity with the "*guideline mix*" of 60% social-affordable rented and 40% intermediate rented housing, in the Local Plan's Policy H4, and similar to the preferred tenure split in Policy H7 of the draft London Plan. The Plan allows for viability assessments to be submitted in support of individual proposals, so that the policy should not be unduly restrictive. I note that the Camley Street area Viability Assessment was based on a mix of 60% social affordable rented and 40% intermediate housing.
- 4.29 Appendix One of the document submitted by the Forum to me on 19 December 2019 includes a modified version of Policy CS HO1, which aims

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to align the affordable housing policy with the draft new London Plan's Policy H5 rather than Camden Local Plan's Policy H4. This would add references to the London Plan's 'fast track' route to thresholds for affordable housing, and alter the desired affordable housing mix to 70% London Affordable (or similar) rent, 30% London Living Rent (or similar), in place of the earlier 60/40% split. I agree with Camden Council that this amendment would place the policy out of general conformity with Policy H4 of the Local Plan. New local viability evidence would be required, in my view, to support the higher level requirement for 70% London Affordable rent in the Camley Street area. In my opinion, local people and stakeholders should also be consulted if such a policy change were to be taken forward. The draft new London Plan is not yet a part of the Development Plan for the Camley Street area, whereas Camden Local Plan currently is.

- 4.30 Policy CS HO1 b) seeks a range of different unit sizes and housing types, including 3 and 4 bedroom houses suitable for families, units suitable for older people and those with a disability; as well as innovative housing design to support home working. I consider the approach to be in general conformity with Policies H1 and H2 of the Local Plan, which aim to maximise housing supply and make self-contained housing a land use priority. I support the modification to criterion b), put forward by the Forum in its Appendix One, which is a response to earlier comments from Camden Council. I also support the proposal to move criterion c) to Policy HO2. I conclude that Policy CS HO1 and its supporting text should be modified, as in **PM9**, so that it is in general conformity with strategic Local Plan Policy H4 and meets the Basic Conditions.
- 4.31 Policy H2 is referenced in Policy CS HO2 of the CSNDP. I have taken account of the suggestion that the Plan should specify in detail some of the criteria in the Local Plan's Policy H2 regarding the suitability of self-contained housing in mixed use schemes. I agree that Policy H2 should be useful for prospective developers in the Camley Street area. However, Policy H2 is referenced on Page 33 of the CSNDP as well as CS HO2, and I shall not recommend that its details are repeated in the Plan. It was also proposed that the wording of the policy should be "tweaked" to clarify whether 50% of all additional floorspace referred to additional floorspace for housing or floorspace for all uses. In order to be in general conformity with Policy H2 of Camden Local Plan, and to add clarity, I consider that Policy CS HO2 should be reworded as in **PM10**.
- 4.32 The Mayor of London welcomed the reference to the Agent of Change Principle in the supporting text (paragraph 6.13.3). I have considered the suggestion that this text should be included in Policy HO2, but consider that the cross-reference in the text to the draft London Plan is sufficient.

- 4.33 Policy CS HO3 adopts a fairly restrictive approach to providing new student accommodation. I have considered whether this is reasonable given Camley Street's proximity to Central London and the "Knowledge Quarter" or cluster of cultural, educational and research institutions based around King's Cross, Euston and Bloomsbury.<sup>11</sup> Shaw Corporation Limited pointed out the opportunity for the Camley Street area to provide higher education and university facilities, not just student housing. Such proposals would need to be considered in terms of the employment policies.
- 4.34 Paragraph 6.14.2 of the Plan welcomes student accommodation as part of a "blended socio-economic demographic", but seeks to resist the provision of large, single-use blocks which are unoccupied for parts of the year. It is explained in paragraphs 6.15.1 to 6.15.9 of the Plan that student housing is significant, and expanding rapidly in this part of Camden. Policy CS HO3 seeks 90% of new homes to be provided as self-contained homes, which would allow for up to 10% as new student accommodation. This ambition would not appear overly restrictive in view of recent completions and Strategic Housing Land Availability Assessment (SHLAA) data. The policy will require careful monitoring and managing, so that the numbers are applied appropriately. However, the Borough already monitors planning permissions and housing developments through its SHLAA. The existing system should enable the Forum to select the best sites and monitor progress on the implementation of Policy CS HO3. I consider that Policy HO3 meets the Basic Conditions and need not be modified. Providing the above proposed modifications are made to the housing policies in the CSNDP, I conclude that they will meet the Basic Conditions.

#### *Sustainable Transport (TR Policies)*

- 4.35 The CSNDP includes two policies on Sustainable Transport. Policy CS TR1 addresses the management of industrial traffic, likely to be a main issue for the area as existing industry is retained and new industry grows, with intensification and more mixed use development. Policy CS TR2 aims to encourage walking and cycling, and improve the safety and accessibility of the area's infrastructure. The thrust of these policies reflects the character of the area, in my view, and has regard for section 9. Promoting sustainable development, in the NPPF. The policies are also in general conformity with Policy T1 Prioritising walking, cycling and public transport, and Policy T4 Sustainable movement of goods and materials in the Camden Local Plan, as well as with paragraph 10.31, which encourages

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<sup>11</sup> Major institutions nearby include University College-London University, the British Library, University of the Arts, Wellcome Trust, Francis Crick Institute and Google, among others.

businesses to consider using the Regent's Canal for the movement of goods and materials.

- 4.36 The Canal & River Trust supports Policy CS TR1 which encourages use of the Regent's Canal for freight movements, and Policy CS TR2 which states that opportunities to enhance the Regent's Canal should be explored when new development in the area is proposed. The Trust suggested that the Plan should address one or two specific issues of towpath accessibility, but I am satisfied that the CSNDP provides sufficient information, and need not be modified in this regard. The Shaw Corporation Ltd, with experience from developments at 101, 102 & 103 Camley Street, pointed out that significant public realm improvements along the Regent's Canal towpath and a new pedestrian footbridge, among other things, have been secured through their development schemes.
- 4.37 It was suggested by a Regulation 16 respondent that Camley Street should be better connected with Agar Grove, notably for pedestrians, cyclists and buses. Camden Cycling Campaign wanted more prominence to be given to the Camley-Agar pedestrian and cycle link. I consider that Figure 45 adequately highlights opportunities for better connectivity, including between Agar Grove and the Plan area. Policy CS TR2 should enable proposals to enhance sustainable transport in the area to be looked at more closely, in the context of future large development proposals. I conclude that the policies for sustainable transport in the Plan meet the Basic Conditions and need not be modified.

#### *Green Infrastructure (GI Policies)*

- 4.38 The LBC ASV representation argued that the policies for green infrastructure were unsubstantiated, there being limited evidence of poor access to green and open space locally. However, as the Camley Street area is expected to undergo redevelopment and intensification, I consider that it is appropriate for policies to protect and enhance existing open spaces, and encourage new provision. Policy GI1 aims to protect and enhance existing open spaces, partly by seeking financial contributions from new developments. The policy covers a wide range of matters including trees and green corridors, and the supporting text describes the availability of open spaces across the area. I consider that paragraph 6.21.7 provides sufficient information about the aim to promote the Camden High Line. Policy GI1 has regard for the NPPF Open space and recreation, paragraphs 96-98, and should contribute to the achievement of sustainable development.
- 4.39 The Canal & River Trust made no objection to Policies GI2 and GI3, but stated that it would wish to discuss any proposals for 'greening' the canal towpath or promoting the waterways for nature and wildlife. It would also be happy to discuss with the Forum canal volunteering or local adoption

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opportunities. I consider that a reference to engagement with the Canal & River Trust should be added to paragraph 6.21.9 of the Plan given the importance of the canal and its towpath to local green infrastructure. In addition, the reference to the Regent's Canal Conservation Area in 6.21.6 should be corrected. The modification, **PM11**, should be made to contribute to the achievement of sustainable development. I conclude that with this modification, the section of the Plan addressing Green Infrastructure will meet the Basic Conditions.

#### *Design Quality (DQ Policies)*

- 4.40 This final section of the CSNDP contains policies to promote high quality design in new development: Responding to places (Policy CS DQ1); promoting Connectivity, Accessibility and Legibility (Policy CS DQ2); and assessing Proposals for Tall Buildings (Policy CS DQ3). The Camden Local Plan includes Policies D1 Design and D2 Heritage which provide a significant number of criteria for prospective developments, so as to secure high quality design. Although it is suggested that the Local Plan policies deal more than adequately with design matters, it seems to me that Camley Street has special characteristics which merit more local policies. The sub-headings in Policy CS DQ1 address matters which are all specifically relevant to the area.
- 4.41 It was alleged by the LBC ASV that the requirement to prevent overshadowing was potentially extremely onerous. I consider that overshadowing of existing residential properties could be seriously harmful to existing occupiers, but some new overshadowing across the area may be inevitable if intensification is to be achieved. The Mayor of London proposed that Policy CS DQ1 should refer to the Agent of Change principle to ensure that building designs protect new and existing occupants and businesses from pollution and disturbance. Accordingly, I consider that a reference to Policy D12 in the draft new London Plan should be added to Page 54 of the CSNDP.
- 4.42 I shall also amend the Landscape and ecology requirements in Policy CS DQ1 to clarify which green and open spaces should be protected, with reference to the Camden Local Plan and Policies Map. I consider that the Architectural and Historic context, and the supporting text in 6.27.5, should acknowledge the presence of Regent's Canal Conservation Area. Thames Water advised that developers would need to consider the effect which new developments would have on water capacity and wastewater networks. It proposed that a reference to its free pre-planning service be added to the Plan. In order to achieve sustainable development and good design, I propose additional text after paragraph 6.27.6 to reference Thames Water. Policy CS DQ1 and its supporting text should be modified as in **PM12**, having regard for national policy, for general conformity with the strategic Local Plan and to help achieve sustainable development.

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- 4.43 There is some overlap between Policy CS DQ2 and the Transport policies, but I consider that improvements to connectivity within the Plan area are an important requirement. I agree that small scale development may have negligible impact on the issue, and accept that the policy should be modified to state: "*New development, where appropriate, ...*". Figure 45 shows opportunities for new connections in relation to Policy CS DQ2, and should assist policy implementation without being too prescriptive, in my opinion. As long as the wording of Policy CS DQ2 is modified in accordance with **PM13**, it will help secure good design and meet the Basic Conditions.
- 4.44 Historic England expressed concern that the CSNDP is not specific about the amount and scale of growth anticipated in the area. Its approach could result in tall buildings which have a harmful effect on strategic views and an undesirable canyon effect. Inappropriate tall buildings would be in conflict with Policy 7.12.D.a of the London Plan 2016, and Policy HC4D1 of the draft new London Plan, it is argued. Concern is raised that, if the mixed use redevelopment area develops as shown in Figure 46, there could be harm to the strategically important views across the area, as shown in Figure 47. The importance of views towards St Paul's Cathedral from King's Cross was emphasised. I accept that it is not feasible for the CSNDP to give specific requirements as to what would constitute acceptable heights for new buildings for every site in the area. However, the Forum and Camden Council proposed an additional criterion in Policy DQ3 requiring applicants to provide visual representations of their proposals for tall buildings, showing the effect on strategic views. I shall recommend that Policy CS DQ3 is changed accordingly. Also, the supporting text should confirm that Figure 46 is only an illustrative drawing as to how the mixed use redevelopment area might develop over the time period of the Plan, and that any tall buildings would have to meet the specific requirements of Policy CS DQ3 and Local Plan Policy D1.
- 4.45 In addition, criterion j) Policy CS DQ3 – Proposals for Tall Buildings requires some re-wording, so that the impact on the designated Regent's Canal Conservation Area is considered in accordance with national planning policy, and so that the strategic views from Parliament Hill and Kenwood House & Gardens across the area towards the south-east are given greater protection. Also, I consider that Elm Village should be mentioned in paragraph 5.31.1 which describes the wider King's Cross development context. The numbering of paragraphs 5.31.1 - 5.31.3 should be modified too. **PM14** would secure all these modifications to Policy CS DQ3 and the supporting text and figure, and is necessary for the achievement of sustainable development and general conformity with the strategic policies of the Local Plan and London Plan. I conclude that the section of the Plan addressing design quality will meet the Basic Conditions, providing all the above proposed modifications are made.

- 4.46 Accordingly, on the evidence before me, with the recommended modifications **PM1** to **PM14** I consider that the policies within the CSNDP are in general conformity with the strategic policies of the Development Plan, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## 5. Conclusions

### *Summary*

- 5.1 The Camley Street Neighbourhood Development Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it, as well as the responses to my letter of 28 November 2019 from the Forum and Camden Council.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### *The Referendum and its Area*

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The CSNDP, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan area, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary, for the purposes of any future referendum on the Plan, should be the boundary of the designated Neighbourhood Plan Area.

### *Overview*

- 5.4 I recognise the hard work which the Forum has put into preparing its Neighbourhood Plan, and engaging with the local community, over many years. I also acknowledge that the area has a diverse range of land uses from railway land and London's best-known canal to industry, housing, St Pancras Coroner's Court and green open space. Located close to the centre of London, the area is already undergoing change, and further redevelopment is expected in the future. The CSNDP aims to provide for the optimum future development of its area, to meet the needs and wishes of existing residents and businesses as well as those of future newcomers and stakeholders. I commend the Forum for producing this Plan which should provide a good starting-point for promoting sustainable

growth in the area, for retaining its existing assets, and managing future development in a balanced way.

*Jill Kingaby*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 5	<p>Figure 1</p> <p>Modify the diagram as proposed by the Forum and shown in the attachment to its letter to the Examiner dated 19<sup>th</sup> December 2019. In addition, modify the key to clarify that freehold and land ownership relate to employment sites, and modify Figure 1 to clarify the boundary of Cedar Way industrial estate.</p>
PM2	Page 6	<p>Paragraph 2.12 The Regent's Canal <b><i>is a designated Conservation Area, as shown in Figure 43, where the character and appearance of the area should be preserved or enhanced as well as</i></b> a designated Green Chain .....</p>
PM3	Pages 20 and 22	<p>Core Objective 1: Employment</p> <p>Development will ensure that the neighbourhood's existing employment function and <b><i>its role as</i></b> a place that supports .....</p>
PM4	Page 22	<p>Paragraph 6.1 Camden Council uses .....Provided that the policies <b><i>in the Camley Street Neighbourhood Development Plan</i></b> are well-evidenced and <b><i>in general conformity with the strategic policies of the adopted</i></b> <del>to</del> Camden <b><i>Local Plan</i></b>, and <b><i>the London Plan</i></b>, and <b><i>have regard for</i></b> national adopted policy <b><i>and meet the other Basic Conditions for neighbourhood planning</i></b>, they will become part of the statutory development plan for the Camley Street Neighbourhood area. ....</p>
PM5	Page 24	<p>Policy CS EM1 – Employment Floorspace Provision</p>

	<p>Modify paragraph 6.4.1 to read:</p> <p>Any redevelopment proposal for a site containing existing employment uses <del>will be required to</del> <b><i>should consider how, if possible, it can</i></b> retain and possibly 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 <b><i>and, where possible, meet the design and layout needs of</i></b> existing <b><i>contemporary</i></b>-businesses. (<del>none of which</del> .....at which rents are charged)</p> <p>Delete the existing policy and substitute the following:</p> <p><b><i>Development proposals involving the redevelopment and/or intensification of existing employment sites:</i></b></p> <ul style="list-style-type: none"> <li><b><i>a) Should ensure that an equivalent amount of employment floorspace is maintained and preferably increased where feasible.</i></b></li> <li><b><i>b) Should ensure that a significant proportion of any new employment floorspace in a major development proposal would meet the varied operational requirements of light and general industry (B1c and B2), storage and logistics/distribution (B8), flexible (B1c/B2/B8) hybrid space, and space for micro, small and medium-sized enterprises.</i></b></li> <li><b><i>c) Should consider providing additional class B use space for small and medium-sized enterprises (SMEs), where feasible, a proportion of which should be suited to meeting both start-ups and move-on space; and</i></b></li> <li><b><i>d) Should ensure that a proportion of the employment space is provided at affordable rents, where viable.</i></b></li> </ul> <p><b><i>Where affordable workspace is provided on-site, management by a specialist provider should be considered to support</i></b></p>
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		<p><b>existing and small businesses. The provider should be identified prior to implementation of the development, in order to ensure that the space caters for specific needs.</b></p> <p><b>The development of employment premises and sites for non-business use will be resisted unless the criteria a. and b. in Policy E2 of the Camden Local Plan are met.</b></p>
PM6	Pages 28 - 30	<p>Policy CS EM2 – Retention of Existing Businesses</p> <p>Delete the existing policy and substitute the following:</p> <p><b>Premises and sites in existing business use in the Camley Street area will be protected, and the uses retained on site in redevelopment schemes, as far as is possible. Those existing businesses that both offer employment opportunity to local residents and support the functioning of the CAZ should be offered appropriate alternative space, as part of the business and industrial space provision in any redevelopment intensification proposals. Where existing businesses wish to remain on site, efforts should be made to integrate them into the overall redevelopment scheme.</b></p> <p><b>Should any businesses vacate their existing employment sites when redevelopment takes place, the total net floorspace vacated should be offered first to comparable business and industrial operators.</b></p> <p>Delete paragraph 6.7.6</p> <p>Rename Table 2: List of <b>current important local</b> protected businesses</p> <p>Delete the footnote regarding Current Greater London Average Rental Rates</p>

PM7	Page 31	<p>Paragraph 6.8.1 'Social infrastructure' can be broadly defined ...contribute to quality of life. <b><i>The National Planning Policy Framework (p.92) also supports positive planning for community facilities, which include the above items of social infrastructure, as well as local shops.</i></b> The Forum recognises ...necessary social infrastructure <b><i>and local shops,</i></b> in order to enhance ....</p> <p>Policy CS CSN1 – Social Infrastructure Provision</p> <p>Developers of major proposals ...</p> <p>Any proposal that will result in the loss of or significant harm to identified existing community assets should be refused <b><i>resisted, unless the assets can be suitably re-located within the area, or special circumstances, such as a major decline in demand, can be demonstrated to show that the asset is no longer required.</i></b></p> <p>Paragraph 6.9.5</p> <p>The key priorities....are:</p> <ul style="list-style-type: none"> <li>• Improved connections ...and street lighting. <b><i>Policy CS TR2 sets out principles for development to encourage walking and cycling provision;</i></b></li> </ul>
PM8	Page 33	<p>Paragraph 6.10.1 Whilst Policy CS HO1 applies across .... identified mixed use area on figure <del>40</del><b>45</b> provides .....</p>
PM9	Page 33	<p>Policy CS HO1 – Affordable Housing Provision</p> <p>Where appropriate <b><i>required,</i></b> developments proposing ... housing need by (<del>as defined by LBC Local Plan Policy H4</del>)</p> <p>a) Delivering the maximum viable quantum of affordable housing on site <b><i>and aspiring to achieve up to 100%:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Where 25 or more homes are proposed,</i></b> delivering 50% on</li> </ul>

		<p>publicly owned land and 35% on all other land;</p> <ul style="list-style-type: none"> <li>• <b>When failing to meet the above thresholds</b>, viability assessments submitted <b>will need to be submitted</b> in support of schemes, <b>which</b> will be subject to scrutiny and made publicly available;</li> <li>• The desired affordable mix is 60% London Affordable (or similar) rent, 40% London Living Rent (or similar).</li> </ul> <p>b) Providing a range... suitable for families, and homes suitable for older people and people with disabilities. <del>homes suitable for families, adaptable units for older people and suitable housing for those with a disability subject to locally assessed need.</del></p> <p>Criterion c) should be moved to Policy HO2.</p> <p>Paragraph 6.11.2, add a sentence to the end:  <b>Affordable housing will be required on sites where the number of new homes provided exceeds the thresholds established in Policy H4 of the Camden Local Plan.</b></p> <p>Paragraph 6.11.3, last sentence: For this reason, ... 100% affordable units, and <b>an</b> <del>minimum</del> expectation of 50% ...</p> <p>Delete paragraph 6.11.7 and modify 6.11.8 as follows: <del>The</del> <b>Camden's Strategic Housing Market Assessment</b> identifies a mix of dwellings ...</p>
PM10	Page 36	<p>Policy CS HO2 – Residential Provision within Mixed Use Development</p> <p>Proposals to redevelop sites that currently support industrial uses, into mixed-use developments, <b>particularly on sites of 1,000 sqm floorspace or more</b>, should provide at least 50% of all additional floorspace created, <del>of 1,000sqm or more,</del> <b>for</b></p>

		<p><b>housing</b>, as self-contained housing where residential development is demonstrated .....</p> <p><b><i>Innovative housing design that supports home working will be encouraged.</i></b></p>
PM11	Page 49	<p>Paragraph 6.21.6 penultimate sentence: All trees located within the Regent’s Canal Conservation <b>Area</b> and those protected .....</p> <p>Paragraph 6.21.9 Add a sentence to the end: <b><i>The Canal &amp; River Trust which owns and manages this part of the Regent’s Canal and its towpath welcomes ongoing engagement with the Council and other stakeholders to secure enhancements to the waterway corridor.</i></b></p>
PM12	Pages 54, 55	<p>Policy CS DQ1</p> <p>All development proposals should....</p> <p><i>Existing residential....</i> Thus, any new development should <b><i>be designed to avoid</i></b> minimise its impact by preventing overshadowing, <b><i>as far as possible</i></b>, and an unacceptable .....</p> <p><i>Architectural and historic context:</i> <b><i>Preserve or enhance the character and appearance of Regent’s Canal Conservation Area, and its setting.</i></b> Preserve and enhance the settings of <b><i>other</i></b> existing heritage .....</p> <p><i>Landscape and ecology:</i> Retain existing formal and informal green and open spaces <b><i>designated through Camden Local Plan and shown on the Policies Map</i></b> and seek to enhance ...<b><i>In addition, the value of undesignated green and open spaces should be considered and, where clearly important for amenity or biodiversity, retained or re-provided, subject to the wider benefits of development schemes.</i></b> Explore opportunities.....</p> <p>Conformity with other policies.....</p> <p><b>Draft New London Plan</b></p>

		<p>D1 ...D2 <b>D12(Agent of Change Principle).</b></p> <p>Paragraph 6.27.5 Notable heritage assets .....Plan) include: <b>The Conservation Area</b>, The Constitution pub .....</p> <p>6.27.6 ....</p> <p><b>6.27.7 Developers need to consider the net increase in water and waste water demand to serve their developments, and any impact the developments may have further down the network. Thames Water offers a free pre-planning service- <a href="https://thameswater.co.uk/preplanning">https://thameswater.co.uk/preplanning</a> to assist developers at an early stage.</b></p>
PM13	Page 58	<p>Policy CS DQ2 – Connectivity, Accessibility and Legibility</p> <p>Modify the second sentence: New development, <b>where appropriate</b>, should help facilitate ...</p>
PM14	Page 60	<p>Policy CS DQ3 – Proposals for Tall Buildings</p> <p>j) Preserve or enhance the <b>character and appearance of Regent’s Canal Conservation Area and its setting.</b> Preserve or enhance <b>the area’s</b> heritage assets and the views ...including conservation areas: .....</p> <p>In addition, any tall buildings....existing amenity. <b>All new development proposals should provide accurate visual representations that illustrate the impact of the development on the strategic views crossing the neighbourhood plan area.</b></p> <p>6.31 Proposals for Tall Buildings</p> <p>Modify the numbering of paragraphs 5.31.1 to 5.31.3 (to 6.31.1.to 6.31.3).</p> <p>5.31.1 The wider King’s Cross ....Maiden Lane, Agar Grove, <b>Elm Village</b> .....</p> <p>5.31.3 Figure 45 .... Kenwood House. <b>Figure 46 provides an initial illustrative drawing</b></p>

		<b><i>of future development in the Camley Street area. The height, massing and interrelationship of any new buildings on these sites would need to be assessed against the criteria in Policies CS DQ1, 2 &amp; 3, and against Policy D1 of Camden Local Plan.</i></b>
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