

## **Part 3 – Early engagement undertaken to inform the preparation of the draft new Camden Local Plan**

This consultation statement summarises the consultation and engagement that has been undertaken to date to inform the development of the draft new Local Plan.

The consultation statement is split into three sections:

- Section 1 details the consultation and engagement undertaken as part of the call for views held from late 2022 to early 2023, summarises the comments made and sets out the Council's response to these.
- Section 2 provides a summary of the workshop undertaken with students from Regent High School in Spring 2023.
- Section 3 details the consultation and engagement on the draft Site Allocations Local Plan that was undertaken both in 2020 and in late 2021/ early 2022, prior to the decision being made by the Council to take forward the draft site allocations as part of the review of the Local Plan

### **Section 1 - Call for Views**

A call for views was held on commonplace from the 4 November 2022 to the 13 January 2023 ([Community Forum - Camden Local Plan Review - Commonplace](#)). The purpose of this engagement was to enable residents, businesses, and community groups to share their views on the current Local Plan and set out their key priorities for the future, to help shape our planning policies moving forward. Responses were also invited via email and hard copies of the commonplace survey were placed in all Camden's libraries.

The initial engagement on the Local Plan review was widely advertised through the following channels:

- An email sent to our consultation database (895 contacts) and Members. We also asked other services to email their contacts;
- We are Camden consultation page;
- Planning policy webpages and a news article on the Council's website;
- The Council's social media platforms, including Facebook and Twitter;
- Posters sent to libraries and community centres to display;
- A press release was sent to local newspapers, which resulted in an article in the Ham and High;
- An advert in the Ham and High and Camden New Journal;
- A short article about the engagement included in the November Business Newsletter and the VAC Newsletter;
- A banner on the planning pages of the Council's website and at the end of email alerts sent out by Development Management;
- Article in our Planning Policy Newsletter.

In total we received approximately 1,500 comments from 247 respondents. Of these,

187 respondents commented through commonplace and 60 respondents commented via email. Just over half of the individual comments received, however, were made via email. Over the consultation period, there were also over 3,200 visitors to commonplace site.

A wide range of responses were received to the consultation, however, the topic areas that generated the most comments overall (in terms of total number of comments made via commonplace and email) were:

- Challenges and Opportunities (264 comments received from 123 respondents);
- Climate Change (251 comments received from 52 respondents); and
- Natural Environment (147 comments received from 43 respondents).

As part of the engagement we also asked respondents on commonplace to drop a pin on an interactive map of Camden and tell us about 'Your Neighbourhood', in terms of what they like about their local area / what makes it special, and how they would like it to change in the next 5 years and 15 years. We received 176 responses to these questions, covering all wards. A summary of these responses is set out below.

We also asked respondents to tell us what they thought the main priorities should be for the new Local Plan. The top four priorities were:

- Housing and affordable housing provision;
- Climate change and sustainability;
- Social infrastructure provision; and
- Health and wellbeing.

A summary of the comments made as part of the initial consultation on the Local Plan review and the Council's response is set out below.

## **Summary of Comments and Council's Response**

### **Representations on 'A New Local Plan'**

In total 61 representations were made on 'a new local plan' by 31 consultees. Of these, 36 representations were received via commonplace and 25 representations were received via email. 8 agreements were also received through commonplace.

#### **How easy is it to find and access the Local Plan on the Council's website?**

- The majority of responses (43%) found it very easy/easy to find and access the Local Plan on the Council's website.

#### **How can we improve the design and layout of the Local Plan and make it easier to read?**

- Create a summary document to accompany the Plan.
- Include more graphic design.
- Should be provided as a single document.
- Not clear how to read the Plan.
- Captions on photos with explanation.

- Include signposting in the Plan.
- Set out what the plan means for different parts of the Borough.
- The Local Plan ought to be concise, strategic and visual, with detail contained within the Camden Planning Guidance.
- The Plan should be wholly interactive, digitally interactive.

### **How can we make the Local Plan more interactive and accessible?**

- Should present the Plan as an interactive pdf which can be saved and edited as one goes along.
- Add it to the front-page menu that comes up when any enquirer goes to the main Camden website.
- Draft Local Plan should be a downloadable one single PDF document, rather than an online page-by-subject format which is confusing.
- Provide a summary of the Plan.
- Write in plain English.
- Future planning policy maps should be provided as part of an online interactive map (rather than just .pdf version) to make it easier / clearer to understand what planning designations a site might be subject to.
- Future evidence base / evidence submitted to the Planning Inspectorate as part of any future review should be clearly accessible to the public to help applicants understand how either the Council or the Planning Inspectorate is interpreting policy requirements or expectations.

### **Council Response**

- The draft new Local Plan will continue to set out the planning framework for managing development in Camden, with more detailed provided in the Camden Planning Guidance. The Plan also signposts to other strategies, policies and guidance where relevant.
- The Plan takes an area based approach to support and guide the delivery of new development in the borough, focussing on the areas of South Camden, Central Camden, West Camden and North Camden. Within each area site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities together with necessary infrastructure.
- The draft new Local Plan will be designed to include maps, photos and graphics, to make it more visual.
- The draft new Local Plan will be available to view as a single document, either online via the Council's website (as a pdf) or on deposit at Camden's Council run libraries (as a physical document).
- A summary of the Local Plan will be available to view on the Council's website when it is published for consultation and engagement.
- The current Local Plan is accompanied by an interactive Planning Policies map which is published on this Council's website. This will be updated as part of the Local Plan review to reflect the Council's new planning policies. An interactive

map of the proposed site allocations will also be published when we consult on the draft Local Plan.

- The updated evidence base produced to support the preparation of the Plan will be published on the Council's website as part of the consultation and engagement on the draft new Local Plan.

## **Representations on Your Neighbourhood**

In total 176 representations were made on 'Your Neighbourhood' by 60 consultees. Of these, 147 representations were received via commonplace and 29 representations were received via email. 30 agreements were also submitted through commonplace.

- When asked how connected they felt to their local area, 92% of respondents on commonplace stated they felt either connected or very connected to their local area. (57 people responded to this question)
- When asked how safe and welcoming their local area was, 55% of respondents on commonplace described their local area as either safe and welcoming or very safe and welcoming. (53 people responded to this question)
- When asked 'What do you like about your local area and what makes it special?' respondents cited:
  - The parks and open spaces in the borough
  - Proximity to the city and Camden's accessible location
  - Sense of history and heritage
  - High quality architecture
  - Good transport links
  - Good mix of uses
  - Low density living
  - Diverse and mixed community
  - Good sense of community - 'Village' atmosphere
  - Well served by social infrastructure
  - Good primary schools
  - Variety of shops and restaurants, including independent retailers
- Respondents were then asked 'How would you like your local area to change in the next five years and the next 15 years?'. A summary of the changes respondents would like to see in their areas, in the future, is set out below:

### **Transport and Streets**

- Reduced traffic
- Pedestrians and cyclists to take priority
- Reduced car parking spaces
- Reduced pollution
- Improved step free access at stations
- More cycle lanes and safer cycle parking
- More EV charging points
- Safer streets
- Cleaner streets

- Improve safety and security (better street lighting, more CCTV cameras, better policing, reduce vandalism)
- Improved road network

#### High Streets and Retail

- More support for independent retailers, restaurants & street markets
- More outdoor dining
- Improve the environment in the borough's high streets and centres
- No more betting shops

#### Natural Environment

- Provide more publicly accessible open spaces
- Ensure better maintenance of open space
- More wildlife conservation
- Provide better links between open spaces
- Plant more trees/ street trees and do more to protect existing ones

#### Housing

- Greater support for the homeless
- More controls on freeholders and landlords to require them to maintain properties
- Ensure that Camden builds well designed and good quality housing
- More genuinely affordable / social housing
- Avoid the displacement of local people
- Provide a mix of housing to enable families to stay in the area
- No more infill flats and building on estates
- More residential accommodation built and less office space
- No overcrowding or oversized development

#### Design

- No more tall buildings
- Improve the quality of development coming forward in Camden
- All buildings should be accessible and pavements smooth and hazard free

#### Economy

- Provide more affordable workspace
- Protect local businesses
- Develop a circular economy to create sustainable business, jobs and training

#### Sustainability

- Buildings should be refurbished rather than demolished
- Existing buildings should be made more energy resilient
- Address air quality and rising temperatures
- Provide more SuDs (sustainable urban drainage systems) to reduce flooding

#### Community

- Provide more bins and more frequent waste collection services
- Provide more health, education and community facilities as part of new developments

- Ensure community buildings are re-provided when they are lost
- Improve library services
- Provide more youth clubs and safe places for young people
- Retain and upgrade public toilets
- More enforcement of anti-social behaviour, fly tipping etc.
- More participatory democracy
- Reduce impact on residents from construction sites

## **Council Response**

- The Plan sets out the future development needs for Camden. These have been updated to take into account our latest evidence in relation to the numbers of additional homes, office floorspace and retail floorspace that we need to plan for over the Plan period to 2041.
- The Plan takes a more area-based approach to support and guide the delivery of new development in the borough, with sections on South Camden, Central Camden, West Camden and North Camden.
- The area strategies proposed for the South, Central, West and North areas of Camden set out the Council's approach to the delivery and location of new homes, jobs, retail and leisure uses, and infrastructure in each of these areas, in line with the Plan's vision and objectives.
- The Plan incorporates and updates the site allocations from the draft Site Allocations Local Plan into the Local Plan. These are grouped by area.
- The overarching strategy sets out our proposed approach to delivering healthy and sustainable development', which seeks to ensure that new development coming forward in Camden makes a positive contribution to the borough, to deliver the vision and objectives of the Local Plan, the ambitions, missions and challenges of We Make Camden and the Good Life Camden framework.
- The comments made by respondents in relation to how they would like their areas to change in the future are picked up in the revised policies in the draft new Local Plan, which has been updated to cover -
  - Housing: this chapter includes policies relating to maximizing housing supply; the provision of affordable housing; meeting the housing needs of specific groups; and housing choice and mix.
  - Climate change: this chapter includes policies relating to prioritising the re-purposing, refurbishment and re-use of buildings over demolition; energy reduction in existing buildings; delivering zero carbon development; minimizing waste and prioritizing the re-use of resources; promoting a circular economy; reducing whole life carbon emissions; managing flood risk and drainage.
  - Local economy: this chapter includes policies relating to the delivery of a successful and inclusive economy; affordable workspace provision; the provision and protection of offices; industrial land; hotels and tourism; retail and town centres; markets; hot food take-aways, betting shops and delivery led food business; and the protection and enhancement of cultural facilities.
  - Communities: this chapter includes policies relating to improving health and wellbeing; the protection and enhancement of social and community

infrastructure; the protection and provision of open space; food growing; and the protection of public houses.

- Natural Environment: this chapter includes policies relating to the conservation and enhancement of the natural environment; delivering biodiversity enhancements; tree planting and protection; and protecting water quality.
- Design: this chapter includes policies relating to achieving design excellence; tall buildings; the design of housing; extensions and alterations; heritage; basements; shopfronts; and advertisements.
- Amenity: this chapter includes policies relating to protecting amenity; safety and security; noise pollution (agent of change principle) and air quality.
- Sustainable Transport: this chapter includes policies relating the delivery of safe, healthy and sustainable transport in Camden; prioritizing walking, wheeling and cycling; public transport; parking and car-free development; and the sustainable movement of goods services and materials.
- Delivery and Monitoring: this chapter sets out the Council's approach to the delivery and monitoring of development in Camden, with reference to section 106 agreements and the Community Infrastructure Levy.

## **Representations on Challenges and Opportunities**

In total 264 representations were made on the challenges and opportunities by 123 consultees. Of these, 229 representations were received via commonplace and 35 representations were received via email. 5 agreements were also submitted through commonplace.

### **Should the Local Plan use the same vision as the Council's corporate strategy 'We Make Camden'?**

- 35% of respondents through commonplace thought that the Local Plan should use the same vision as the Corporate Strategy, 45% of respondents thought that maybe the Local Plan should use the same vision as the Corporate Strategy, and the remaining 20% of respondents thought that the Local Plan should set out its own vision.

### **What else should be included in the vision for the new Local Plan?**

Respondents highlighted that the vision for the Local Plan should also reference:

- Spatial Strategy – including the Council's overall ambitions for growth and where new development will be focused.
- Climate Change – including responding to the climate emergency, improving air quality, promoting sustainability, the need to enable properties in conservation areas to adapt to mitigate against climate change, and promoting retrofit over demolition.
- Health and Wellbeing – including the need to influence the wider determinants of health, reduce health inequalities and improve quality of life.

- Natural Environment – including promoting biodiversity, planning for nature, protecting and enhancing open spaces, and the creation of new open spaces.
- Public realm – including improving the environment, keeping streets clean, and improving safety and security.
- Social Infrastructure – including providing opportunities for sport and fitness, and providing more school places and health care facilities.
- Local economy – including emphasising that Camden is part of a world city and a nationally important economy, the role of the CAZ and how the Council intends to support and strengthen this, recognition of the role of the Knowledge Quarter, support for small businesses and the provision of vibrant town centres.
- Housing – including planning for older people, promoting and strengthening housing delivery (including affordable housing delivery), providing a range of housing types, and tackling homelessness.
- Transport – including reducing congestion on the roads, improving roads for cyclists – making Camden more friendly for cyclists, delivering sustainable transport and providing more busses.
- Design – including protecting Camden’s heritage and cultural identity, enabling high quality design and place making and restricting tall buildings.

Respondents also felt that the vision in the Local Plan should -

- Be specific and measurable
- Reflect the needs of the borough
- Recognise competing priorities and how these can be balanced against each other
- Be accompanied by strategic objectives
- Recognise the different identities of each area in the borough

### **What should be the main priorities for the Local Plan?**

The top four priorities for the Local Plan selected by Commonplace respondents were:

- Housing and affordable housing
- Climate change and sustainability
- Social infrastructure provision
- Health and wellbeing

The top four priorities selected by those who responded by email were:

- Climate change and sustainability
- Housing and affordable housing
- Design and place making
- Economic growth, jobs and training



## **Other comments**

- The Council is one of the guardians of the borough and has a duty to protect and conserve the environment for all.
- Recognition needs to be given to the status of neighbourhood plans in the decision making process and this needs to be emphasised in the Local Plan.
- Metrics should be used for policies and objectives to measure and monitor outputs / delivery.

## **Council Response**

- To reflect the Council's corporate vision and assist with the delivery of the Council's priorities the draft new Local Plan uses the same vision as We Make Camden.
- The vision is supported by a set of nine objectives which reflect the ambitions, missions and challenges set out in We Make Camden.
- The draft new Local Plan sets out the development strategy for the borough. The Plan takes an area based approach to support and guide the delivery of new development in the borough, focussing on the areas of South Camden, Central Camden, West Camden and North Camden. Within each area site allocations have also been identified, in accordance with the Council's development strategy, to deliver new homes, jobs, open space, health and community facilities, leisure, retail and recreation opportunities together with necessary infrastructure.
- The draft new Local Plan has been updated to cover a range of topics, with a full list of policy areas covered, provided in the response to the 'Your Neighbourhood' comments above.
- The Local Plan recognises the role of neighbourhood planning in Camden and the relationship between the Local Plan and Neighbourhood Plans is explained in the introduction to the Plan. The area strategies for the South, Central, North and Western areas of Camden also highlight where Neighbourhood Plans have been made and that they should be used to inform and guide development in those neighbourhood areas.
- A set of updated monitoring indicators will be published in due course. These will be used to monitor the effectiveness of the Plan once adopted.

## **Representations on Sharing the Benefits of New Development**

In total 134 representations were made on 'sharing the benefits of new development' by 39 consultees. Of these, 48 representations were received via commonplace and 86 representations were received via email. 6 agreements were also submitted through commonplace.

## **Do you have any comments on the Local Plan's current approach to delivering new development?**

- A greater level of community engagement is needed in the planning process.

- The current approach is too prescriptive and does not take into account the preferences and needs of existing local communities.
- New development needs to be supported by the right infrastructure.
- Need to plan for an ageing population.
- Support current approach to securing CIL and S106.
- More social housing is needed.
- More investment in public transport.
- Opportunities to share the benefits from new development have been limited.
- Developments need to deliver the community benefits promised.
- Opposition to the development of the O2 centre at West Hampstead.
- Need to consider the recent updates to the Building Regulations in relation to Fire Safety.
- There should be less focus on delivering growth.
- Restrict locations for tall buildings.
- Support the Council's strategy to direct significant new development to growth areas and highly accessible town centre locations, and to promote sustainable developments in accessible locations.
- Sometimes it is difficult to understand what the priority land use is in an area as conflicting priorities seem to apply.
- Given the borough's central London location, the whole borough ought to be considered in principle capable of delivering new development.
- Important to optimise opportunities to deliver new homes and commercial spaces in highly accessible locations and on under used, inefficient, sites.
- Avoid the over-densification of sites, particularly when out of character with surrounding area.

### **What should our future Local Plan policies on delivering new development cover?**

- Policies should deliver what residents want.
- Delivering beautiful places.
- Restrictions on the locations of tall buildings.
- Ensuring that development is in keeping with its surroundings.
- Creating cohesive communities and delivering a diverse mix of housing.
- Delivering new infrastructure.
- Securing more affordable housing.
- Enhancing open spaces and delivering greater levels of natural habitat.
- Promoting sustainable growth.
- Promoting a circular economy.
- Support for the role of the arts and culture in Camden.
- Emphasis on retrofitting and re-use over demolition.
- Support the knowledge based economy.
- Identify the benefits that new development in an area will deliver and demonstrate that those benefits will be delivered.
- Promote a construction code of conduct.
- Apply the Agent of Change Principle across all aspects of development.

- In the context of Class E, make explicit that any planning application will be considered as if it were for the most impactful use within the Class.
- Need for effective enforcement of consents.
- A flexible approach should be taken to allow individual scheme circumstances to be taken into account.
- More certainty around financial contributions sought as part of the development, which should be evidenced and justified.
- Encourage infrastructure investment, housing and employment across the Borough in a sustainable manner.
- Promote and strengthen Camden's nationally important economy.
- Promote the use of CIL to maximise physical and socio-economic improvements across the area and resolve existing constraints.
- There should be a spatial element to where the most significant new development should be focussed, such as key growth areas and town centres, areas located along key transport routes and locations with a high PTAL rating.
- The new Local Plan should help facilitate development as much as possible.
- Given the land constraints within Camden, there should be a recognition of the opportunities presented by more efficiently developing existing sites for a wider range of uses and innovative models for re-providing services on existing sites.
- Maintain the current policy approach.
- Growth targets for both new housing and new jobs must be updated to the London Plan and the supporting evidence base to the Local Plan Review. The new Plan should encourage exceeding housing and job targets where possible.
- Need to consider the cumulative burden of policies, obligations and other requirements which will be applied to Euston.
- Consideration should be given to expanding the Kentish Town Regis Road Growth Area to include the Murphy's Yard site given it represents one of the largest upcoming regeneration opportunities.
- The Plan should strongly support the retention in the borough of teaching/academic uses by institutions such as UCL, avoiding the need for them to look for alternative locations outside the borough.
- Policy should support the need for temporary decants while buildings are being refurbished or to respond to unexpected peaks in demand.

**How can the Local Plan ensure that we are capturing and sharing the benefits of new development across Camden, to best meet the needs of our communities?**

- Greater emphasis on public engagement to ensure residents can engage in new schemes coming forward in Camden.
- Planners and developers should engage with local communities in a meaningful way to find out what their needs are and the best ways to meet them.
- Enforcing s106 obligations.
- Direct high-density development at town centres and highly accessible locations to provide much needed housing and employment opportunity for the borough.
- Mixed use needs include a range of spaces, rents/charges.

- The “benefits” of development have to offset the “disbenefits”. It is essential that those living closest to development feel the greatest benefit as this is where the effects of environmental pollution – noise, dust, light – are being felt
- Ensure the code of construction for a site is enforced and that sites are developed considerably.
- Too often the costs of development are borne by the less well off, and the benefits pass the majority of people by. There should be a clearer assessment of the costs to the community of major development.
- The Plan should set out area constraints, what benefits new development in the area will deliver and how this will meet the needs of the area.
- The Plan should set out do minimum and do maximum options for sites.
- The new Local Plan should help facilitate the delivery of development.
- Planning policies should not include onerous standards or requirements which will prevent the optimisation of sites and compromise the delivery of housing across London.
- Policy requirements should be tested to ensure they are viable and deliverable.
- Policy should ensure that community benefits are directly linked to a development and sufficiently flexible to take into account individual site circumstances.
- The Local Plan must be able to take into account the viability and deliverability of development.
- Policy should be flexible enough to allow off site provision and financial contributions in appropriate circumstances, which could better meet the needs of local communities, e.g. for housing and affordable workspace.
- The Plan should recognise that not all sites within the Borough can deliver the same mix of housing, or can support greater leisure and night time uses.

### **Other comments**

- The Council needs to do more to protect residential amenity in areas where there is a tension between housing and night time economy uses.
- Different parts of the Borough have different identities and this needs to be reflected in the Plan.
- The Local Plan expects development coming forward in growth areas to be comprehensively master planned. However, this is a very inflexible approach. Piecemeal redevelopment proposals should be considered an acceptable approach in-principle within Growth Areas.

### **Council Response**

- To inform the preparation of the draft new Local Plan the Council held a call for views from November 22 to January 23. These comments have been used to shape the new and updated policies in the draft new Local Plan.
- As part of the preparation of the new Local Plan the Council is required by the Government to formally consult residents, business and key stakeholders twice – first at Regulation 18 stage on the draft Plan and second at Regulation 19 stage on the final draft Local Plan. To find out more about how we will consult residents, businesses and key stakeholders in the preparation of the Local Plan

then please see the Council's Statement of Community Involvement [1](https://www.camden.gov.uk) ([camden.gov.uk](https://www.camden.gov.uk))

- Appendix 1 of the draft new Plan identifies the infrastructure required to help support the delivery of development in Camden over the Plan period. The draft site allocation policies also set out the infrastructure requirements for specific sites.
- The Plan includes a variety of policies that will help to plan for an ageing population, for example H8 helps to meet the housing needs for older people and D3 (Design of Housing) also requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2).
- The Plan seeks to maximise the supply of affordable housing in Camden and sets an affordable housing target of 50% on developments with capacity for 25 or more additional dwellings.
- As required by the London Plan, to inform the approach to tall buildings in the draft new Local Plan the Council has undertaken a Building Heights Study. This identifies potential locations in the borough where tall buildings may be an appropriate form of development, subject to a number of considerations.
- The Plan sets out the future development needs for Camden. These have been updated to take into account our latest evidence in relation to the numbers of additional homes, office floorspace and retail floorspace that we need to plan for over the Plan period to 2041.
- The Plan takes a more area-based approach to support and guide the delivery of new development in the borough, with sections on South Camden, Central Camden, West Camden and North Camden.
- The area strategies proposed for the South, Central, West and North areas of Camden set out the Council's approach to the delivery and location of new homes, jobs, retail and leisure uses, and infrastructure in each of these areas, in line with the Plan's vision and objectives.
- The Plan incorporates and updates the site allocations from the draft Site Allocations Local Plan into the Local Plan. These are grouped by area.
- The overarching strategy sets out our proposed approach to delivering healthy and sustainable development', which seeks to ensure that new development coming forward in Camden makes a positive contribution to the borough, to deliver the vision and objectives of the Local Plan, the ambitions, missions and challenges of We Make Camden and the Good Life Camden framework.
- The Plan continues to require developers to optimise opportunities to deliver new homes and commercial spaces in highly accessible locations and on under used, inefficient, sites. It also continues to require sites to be brought forward comprehensively and states that piecemeal development will not be supported.
- The draft new Local Plan has been updated to cover a range of topics, with a full list of policy areas covered provided in the response to the 'Your Neighbourhood' comments above.
- The draft new Local Plan continues to protect the amenity of neighbouring occupiers (see Policy A1) to reduce the adverse impacts of development on communities and support health and well-being.

- The draft policies in the Plan have been subject to viability assessment and this assessment will be published alongside the draft new Local Plan.
- Policy IE6 Supporting Town Centres and High Streets sets out the Council's approach to protecting and enhancing the role and character of each of Camden's centres. The retail and town centres policy has been updated to reflect recent changes in national policy. Detailed frontage controls in centres have been replaced (as they are no longer enforceable following the introduction of use Class E), with clear expectations retained for active ground floor uses. A wider range of town centre uses are also encouraged including childcare, affordable workspace, sharing economy etc.
- It is important that piecemeal proposals for individual sites and schemes do not prejudice comprehensive redevelopment or the delivery of any of the ambitions for the area. It is therefore appropriate that the allocation resists development schemes that come forward before the area is comprehensively redeveloped that would prejudice the achievement of future aspirations for the site.

## **Representations on Housing**

In total 110 representations were made on housing by 40 consultees. Of these, 28 representations were received via commonplace and 82 representations were received via email.

3 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to delivering housing delivery?**

- Do more to tackle vacant homes and short-stay/Air BnB housing.
- Do more to secure family homes at prices people can afford. Dense high-rise housing suits a limited range of household types, too much new housing is only suitable for single people.
- Continue to resist the loss of small homes by merging units.
- Recognise that Camden can't accommodate everyone who wants to live in the borough without building to unacceptable heights.
- Will there be enough social infrastructure (e.g. schools and healthcare) to support the amount of housing proposed?
- Developers shouldn't get away with providing low percentages of affordable housing.
- Commercial development should be prioritised in Camden's Central London Area and Knowledge Quarter, the current mixed-use Policy H2 undermines their success. A financial contribution to housing elsewhere could be secured instead.
- High density housing should be prioritised for accessible brownfield sites outside Central London and the Knowledge Quarter, including existing employment sites.
- The current plan doesn't do enough to promote Build to Rent housing, which would diversify the housing offer in the borough and is needed for young people who can't afford to buy.

- The current plan places too many restrictions on student housing.

### **What should our future Local Plan policies on housing delivery and housing need cover?**

- The focus should move from new build homes to making the best of existing homes by reducing vacancy, extending, retrofitting and improving sustainability and quality.
- More accessible housing should be provided for older people and disabled people.
- The impact of housing on future social and health care needs should be considered.
- Do more to tackle vacant homes and short-stay/ Air BnB housing.
- Do more to secure family homes at prices people can afford, dense high-rise housing suits a limited range of household types, too much new housing is only suitable for single people.
- Affordable housing targets should be set so they are viable to deliver without limiting overall housing delivery.
- Commercial development should be prioritised in Camden's Central London Area and Knowledge Quarter, the current mixed-use Policy H2 undermines their success. A financial contribution to housing elsewhere could be secured instead.
- High density housing should be prioritised for accessible brownfield sites outside Central London and the Knowledge Quarter, including existing employment sites.
- Policy should recognise that smaller private homes are needed to keep young people in Camden and are more affordable than large private homes.
- Policy should promote diverse and emerging housing typologies including build to rent, senior living, student housing and co-living.
- Future policies should be founded on a robust evidence base including the 2021 Census and considering the full range of housing tenures and types.

### **How can the Local Plan deliver more homes and make sure they meet the needs of residents in terms of housing type, size, accessibility and affordability in Camden?**

- Use planning powers to resist excessive densities and ensure all necessary infrastructure is provided.
- Focus on smaller sites delivering 5-6 storey developments, large sites dominated by high rise development are controversial and prone to a protracted process of planning and delivery.
- Provide a suitable range of housing types for each community so that existing residents have access to suitable housing at different stages in their lives.
- Do more to secure family homes at prices people can afford, dense high-rise housing suits a limited range of household types, too much new housing is only suitable for single people.
- Future policies should be founded on a robust evidence base including the 2021 Census and considering the full range of housing tenures and types.
- Provide greater flexibility for a range of intermediate housing types.
- Provide flexibility for developments to respond to changes in the housing market.

- Commercial development should be prioritised in Camden's Central London Area and Knowledge Quarter, the current mixed-use Policy H2 undermines their success. A financial contribution to housing elsewhere could be secured instead.
- High density housing should be prioritised for accessible brownfield sites outside Central London and the Knowledge Quarter, including existing employment sites.
- Follow the London Plan's design-led approach to optimising housing density for each site.

### **Other comments received**

- Follow the London Plan's approach to public land and allow the 50% affordable housing target to be considered across TfL's entire portfolio.
- The housing situation has got worse since adoption of the 2017 Local Plan, a Housing Strategy is needed to coordinate the Council's powers and deliver creative solutions to overcrowding including options for older people and for home buyers.
- A new SHMA is needed to provide evidence of needs across tenures and age groups and provide a tool for lobbying Government for flexible funding. The SHMA should also look at the needs for gypsy and traveller accommodation, including those who have been forced to live in settled accommodation and wish to return to sites.

### **Council Response**

- Policy H1 states that, to meet the borough's housing target, the Council will seek to secure a sufficient supply of homes to meet the needs of existing and future households in Camden by, amongst other things, working to return vacant homes to use and ensure that new homes are occupied.
- The Plan resists the permanent conversion of residential floorspace to short-stay accommodation through Policies H1 and H3.
- The draft plan states that the Council will work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of our community and support the delivery of services, and that we will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development (Policy SC2)
- Proposed Policy H6 states that, when negotiating the types of housing included in developments in Camden, the Council will seek provision suitable for families with children, older people, people with disabilities, service families, people wishing to build their own homes and Camden's traveller community. The Council will require a range of dwelling sizes in accordance with Policy H7 including a mix of large and small (studio flats, 1-bedroom and 2-bedroom) homes. Other policies will also encourage the delivery of larger homes, such as Policy H3.
- Policy H3 resists the net loss of all residential floorspace, and resists the development of existing housing which would involve the net loss of two or more homes. Policy H1 states the Council will resist very large homes (which often arise from merging units). These have an impact on the ability of the borough to meet its housing targets as the sites are often capable of accommodating a much larger number of smaller homes, including smaller family homes.



- Policy SC2 states that the Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of new development.
- Policy H4 sets out the Council's policy approach to maximising the supply of affordable housing. It states that the Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable, and promotes a guideline mix of affordable housing types of 60% low-cost rented housing and 40% intermediate housing. Policy H4 states that in considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will take into account the economics and financial viability of the development including any particular costs associated with it.
- The draft Local Plan has been viability tested to ensure that the policies do not act as an impediment to the delivery of development.
- The London Plan 2021 sets a threshold of 50% for publicly owned land and industrial land and a 35% threshold in most other cases. Considering the 2021 thresholds in tandem with Local Plan Policy H4, the 50% threshold will generally be relevant to schemes on public or industrial land with capacity for 25 or more additional homes, while the 35% threshold will generally be relevant to other schemes with capacity for 18 or more additional homes.
- Policy H5 sets out the Council's policy approach to protecting and improving affordable housing.
- The Local Plan update proposes to retain the current mixed-use approach (policy H2), which was found sound by the Inspector at the previous Local Plan examination. Securing housing as part of a mixed-use scheme is a way of meeting some of the Council's housing needs whilst also meeting other needs, such as providing jobs, services and facilities. It is not considered that this approach undermines the success of Central London or the Knowledge Quarter.
- The provision of 'super-prime' large homes has an impact on the ability of the borough to meet its housing supply targets as the sites for these developments are often capable of accommodating a much larger number of smaller units.
- In accordance with the London Plan, the Local Plan identifies locations where tall buildings may be an appropriate form of development, subject to meeting specific policy criteria and the other requirements of Plan.
- Policy H4 supports the provision of Build to Rent housing, purpose-built student accommodation, and large-scale purpose-built shared living, and seeks a contribution towards on-site affordable housing where feasible.
- The Local Plan seeks a supply of student housing to meet or exceed Camden's target and ensure this meets genuine need for such accommodation and does not create a harmful concentration or cause harm to nearby residential amenity. It also protects existing student housing unless it is replaced, no longer needed or sub-standard. We do not consider the policy places too many restrictions on such development.
- Policy H8 will set out the Councils strategy for specialist housing, including housing for older and disabled people. Policy D1 states that the Council will require that development meets the highest practicable standards of accessible and inclusive design so it can be used safely, easily and with dignity by all.

- The Plan aims protect, improve and increase the existing stock of affordable housing in Camden, and to maintain and improve the mix of affordable housing types and sizes (Policy H4).
- Policy DM1 states that the Council will deliver the vision, objectives and policies of the Local Plan by, amongst other things, using CIL, planning contributions and legal agreements where appropriate to: support sustainable development; secure the infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- Conflicting views on density were received during the consultation. The London Plan forms part of all borough development plans and therefore developments in Camden should be in accordance with London Plan Policy D3 'Optimising site capacity through the design-led approach'. Proposed Local Plan policy DS1 seeks to ensure that land is used efficiently and that a development makes best use of its site. Proposed Policy D1 requires development to respond positively and sensitively to local context and character through layout, orientation, scale, height, bulk massing, proportion.
- The London Plan 2021, which forms part of the borough's development plan, states in Policy H2 that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making. Camden Council support the delivery of small sites through the development management process, by identifying and allocating appropriate small sites for residential development through the plan-making process, and by listing small sites on the brownfield register. Furthermore, Policy H1 of the draft Local Plan seeks to maximise housing supply from all sites.
- Any update to the Council's Housing Strategy would be separate to the review of the Local Plan.
- The Local Plan will be supported by an up-to-date evidence base, which will include an update of housing needs.
- The Plan will require development to support the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building. It will require developments to achieve net zero carbon emissions, optimise resource efficiency, and be designed to be resilient to climate change (Policy SD1).
- Policy CC1 states that the Council will prioritise and enable the repurposing and re-use of existing buildings over demolition. Applicants will be required to justify proposed partial or full demolition.

## **Representations on the Local Economy**

In total 109 representations were made on the local economy by 15 consultees. Of these, 13 representations were received via commonplace and 96 representations were received via email. 3 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to economic development?**

- Some developers considered the employment policies in the Local Plan are overly restrictive and should be more flexible to allow alternative land uses, based on individual site characteristics and constraints

- Outside of the CAZ, Knowledge Quarter and town centres, remove automatic protections for employment sites
- The Local Plan mixed-use policy risks jeopardising success of the CAZ and Knowledge Quarter
- The Plan should be giving 'significant support' for the CAZ and Knowledge Quarter in line with London Plan
- Affordable workspace requirements should be justified and based on evidence. Policy for affordable workspace should take account of site conditions and viability
- Re-use/development of office buildings: support a wider range of employment generating business uses and support for mixed/composite uses
- Employment policies should focus on numbers/types of jobs rather than being focussed on protection of floorspace for specific land uses
- Review marketing requirements for surplus / historic office spaces to make conversion to residential easier as often difficult to upgrade such premises to meet modern employment requirements. Reduce the duration of marketing in such cases to 6 months
- For marketing exercises: allow a wider range of employment/business uses to be taken into account
- Give more support for residential on upper floors, i.e. Seven Dials
- Review Locally Significant Industrial Site (LSIS) designation for Murphy's Yard to ensure optimal placemaking and community benefits can be realised
- Review employment and training contributions applicable to education uses. Currently the plan does not recognise the university's existing apprenticeship and bursary programmes. Education uses also contribute to the economy and can deliver the same/more jobs.
- Anti-car/parking policies are detrimental to local centres

#### **What should our future Local Plan policies on economic development cover?**

- Developers: review the 'blanket' approach to protection of employment sites, support mix of uses with some floorspace re-provided
- Demand for Bloomsbury's education and R&D facilities (particularly life sciences) to be met at Euston / north of Euston Road
- High demand for sufficient 'grow on' laboratory space
- Calls for greater recognition of science and innovation and educational uses (supporting R&D and life sciences provision)
- Meeting Camden's housing targets means employment policies should be flexible, taking account of site and economic circumstances and the demand and supply pipeline
- Continue to meet growth in office space in the CAZ, growth areas and town centres and support the intensification of employment sites
- In the Knowledge Quarter area, commercial floorspace should be prioritised for priority growth sectors
- Where industrial floorspace is to be re-provided: light industrial uses can form an important function in Gospel Oak and Kentish Town delivering significant placemaking benefits and can operate with lesser environmental impact

- Remove plot ratio requirements in Kentish Town for industrial sites
- Definitions of 'business' and 'employment' should be widened to provide policy support for hotels and leisure uses
- In place of marketing, require a commercial market report to consider the prospects of reletting
- Give priority for retaining offices in proximity to mainline stations with more flexibility for protecting elsewhere
- Provide a supportive framework for temporary education permissions and temporary decants
- Some residents requested that intensification of Tottenham Court Road/ Holborn corridors is ceased
- Increasing the size of the economy for its own sake will not bring about beneficial change / improve wellbeing

### **How can the Local Plan deliver a strong, sustainable and inclusive local economy?**

- The quality and nature of some employment sites are now outdated and no longer work in terms of their location
- Changing patterns of economic activity resulting from Brexit, the Covid pandemic and uncertainties in the global economy
- Approach to retention and retrofit vs demolition, including industrial sites
- Making business/industrial sites greener
- Make Kentish Town and West Kentish Town a centre for the circular economy in London by building on the Regis Road Recycling Centre, Library of Things and Fixing Factory to create sustainable businesses, jobs and training
- Optimising sites, particularly those that are allocated, brownfield sites or those within town centres and growth areas
- The importance of affordable workspace is critical for local communities
- Retaining 'traditional' jobs: support construction skills and retain light industrial sites (such as Camley Street)
- The quantum of office floorspace required having regard to home working arrangements and office demand in a post-pandemic world. The role of a wider range of business types and activities

### **Other comments**

- There are many professional services companies often based in small premises around the borough. Such businesses are frequently very specialised with high-skilled staff. Allowing or encouraging change of use too easily (perhaps in pursuit of housing as an over-riding priority) could result in businesses are squeezed out and the buzz of the area replaced by bland uniformity

## Council Response

- The draft new Local Plan's policies on the economy seek to maximise opportunities for Camden residents, businesses and the voluntary sector to contribute to and share in the Borough's economic growth.
- The proposed policies seek to ensure a continued supply of office, industrial and warehousing land and premises to meet needs, and deliver growth and innovation while securing commitments from schemes focussed upon social, economic and environmental outcomes.
- Whilst the Plan seeks to protect employment land and uses, it also provides sufficient flexibility to allow for the loss of offices and industrial land where justified against the criteria set out in the Plan.
- The draft new Local Plan continues to seek to maximise the supply of self-contained housing from mixed use schemes (Policy H2), as this forms an important part of our strategy for boosting housing supply in Camden and providing mixed and balanced communities, particularly in the South of the borough. We consider that this approach helps to sustain and contribute to the success of the CAZ and the Knowledge Quarter, rather than jeopardising them.
- The Council will continue to steer office provision towards the Central Activities Zone and other centres commensurate with their size and function. This will contribute to the vitality of centres and enable the further development of existing clusters of firms. A significant component of this supply will be from allocations set out within the draft Local Plan.
- The Plan proposes a new approach to the provision of affordable workspace, that will also enable us to pool financial contributions (secured in lieu of provision) and provide affordable workspace in more convenient locations if that delivers a better outcome. This approach has been tested as part of the viability study for the Local Plan.
- The Plan supports the refurbishment, re-purposing and reuse of existing buildings over demolition (Policy CC2).
- The Plan tends to focus on land uses rather than jobs, as planning can influence land uses and floorspaces, but not numbers and types of jobs (although this is affected by the uses and floorspace provided).
- Policy IE1 of the draft new Local Plan aims to support residents seeking work to access jobs, skills, education and training opportunities.
- As part of future updates to our Camden Planning Guidance on employment we will review employment and training contributions applicable to education uses, recognising the university's existing apprenticeship and bursary programmes.
- The marketing requirements for surplus/ obsolete offices have been reviewed as part of the Local Plan review and the Plan now states that marketing should be conducted over a minimum of a 12 month period and by at least 2 agents with knowledge of the local property markets (Policy IE2). 6 months is considered to be too short a period to undertake a marketing exercise in.
- Camden has a small but important stock of industrial land. About a quarter of the borough's industrial supply is within the Industry Area in Kentish Town designated on the Local Plan Policies Map. This designation is equivalent to

Locally Significant Sites (LSIS), used in the London Plan to describe sites with particular importance for industrial and related functions. The Council's strategy is to manage and protect the supply of industrial and warehousing land. Where the Local Plan proposes the development of existing industrial land, this must form part of a comprehensive and intensified employment-led approach (Policy IE3). The Council does not propose to remove the designated industry area from the Local Plan policies map.

- The Plan prioritises walking, wheeling and cycling and requires new development in Camden to be car free in line with the objectives set out in the Camden Transport Strategy. Camden is a highly accessible borough and the town centres, neighbourhood centres and high streets in the borough are accessible by a variety of modes of transport. It is considered that limiting car use in Camden should have a positive impact on the environment of our centres, in terms of improving air quality, and should also make them safer for people to move around.
- The Plan recognises that the CAZ and the Knowledge Quarter centred on Kings X and Euston will continue to be the main focus for employment development in Camden. The Plan supports the Knowledge Quarter to thrive as a hub of innovation and knowledge intensive industries in line with the KQ2050 Strategy, recognising the demand for research and development and life sciences provision in the borough.
- In response to the changing demands of office tenants, the approach to the provision and protection of offices in the Plan has been updated to give more flexibility in considering the future use of vacant offices, including for housing (Policy IE2).
- Policy CC2 of the plan seeks to encourage the re-use of buildings over demolition.
- The Plan supports businesses and enterprises of all types and sizes for a variety of business activities, while prioritising the delivery of space for key growth sectors, research-based activities and start-ups, smaller businesses and social enterprises. Further to this the Plan expects larger schemes to provide a range of unit sizes to increase the supply of space available for smaller businesses and entrepreneurs (Policy IE1).
- The Plan sets out the Council's strategy in relation to hotels and visitor accommodation. The Council will steer additional provision to areas of the Central Activities Zone where there are already concentrations of these uses and to sites within designated town centre boundaries. Policy IE5 deals with tourist and visitor attractions such as museums, galleries and music venues.
- We do not consider that definitions of business and employment as defined by the Plan should include hotel and leisure uses.
- The Plan states that we will apply our design policies to ensure that new workspace is well laid out, functions well for its intended users and can adapt to changing working practices (Policy IE1).
- The Plan requires development to be designed to make the most efficient use of Camden's limited land (Policy DS1).

- Policy IE1 states that the Council will work with landowners and developers to bring forward comprehensive mixed-use regeneration proposals that provide for the intensification of under-utilised sites/land to deliver employment uses and other priority uses.
- Kentish Town is identified as a key growth area within Camden. Development at Kentish Town will mainly be delivered through site allocations at Regis Road and the Murphy Site. These existing employment sites will be intensified to deliver a new neighbourhood that provides a mix of uses, including industry and other employment uses that will generate jobs, in addition to much needed housing and community and social infrastructure. The Council will seek to secure training contributions from development coming forward in this area in line with Policy IE1.

## **Representations on Retail and High Streets**

In total 36 representations were made on high streets and centres by 18 consultees. Of these, 13 representations were received via commonplace and 23 representations were received via email.

### **Do you have any comments on the Local Plan's current approach to high streets and centres?**

- Residents' preference for modest improvement schemes over large/major redevelopments
- Developers' expectation that policy will be set in the context of London Plan's requirements for densification / optimisation
- Acknowledging the evolution of high streets: existing Plan focusses heavily on retail and shops
- Frontage controls have been superseded
- Giving more focus to improving the quality of the environment / street scene: shopfronts, traffic, greenery, impacts of night-time economy etc.
- Provision of affordable retail space as well as maker space
- Ensuring sufficient provision for independents
- Ensuring adequate parking (on street) for people with disabilities / people without a mobility badge but have limited mobility

### **What should our future Local Plan policies on high streets and centres cover?**

- Encouraging a greater mix of uses in centres
- Reducing incentives for converting pubs and launderettes
- Tackling noise and pollution in high streets
- Expectation that town centres sites support high-density, mixed-use in appropriate locations
- Going beyond traditional retail to deliver placemaking: beauty, health and fitness, leisure, cultural, creative, education and community uses
- Protection of traditional/long-established retail and food and drink outlets and LGBT services

- Consideration of the spending/multipliers of ground floor uses when negotiating contributions
- Consideration of Evening and Night Time Economy

### **How can the Local Plan support Camden's high streets, centres, and markets to remain vibrant and dynamic focuses for the community in the future?**

- Fitzrovia now has a monoculture of cafes, restaurants and premises serving alcohol leading to noise and ASB
- Addressing problems associated with the increased number of out of hour deliveries from café and restaurant businesses. Also more waste collections out of hours
- Policy for high streets should be flexible to support innovation and evolution in the work-from-home era

### **Other comments**

- Provide policy for railway arches – many in Camden are vacant but would be able to support a diverse range of business sizes and uses
- Hot food takeaways can be valuable community assets particularly in the current cost of living crisis where some poorer families cannot afford the cost of buying food or cost of gas/electricity to cook food

### **Council Response**

- The draft new Local Plan supports the provision of at least 2,500sqm of additional retail floorspace to provide for and maintain a range of shopping opportunities, to meet the essential needs of local communities.
- The Local Plan focuses on sustaining and enhancing centres, having regard to their distinctive roles, character and accessibility while allowing beneficial change that meets local needs and priorities.
- The site allocations in the Local Plan identify some sites in the CAZ and in designated town centres where further retail and leisure uses are likely to be accommodated, often through mixed-use developments. This includes the provision of low-cost retail space as part of the planning consent for the 02 in Finchley Road.
- The approach to town centres and high streets has been updated to reflect recent changes in national policy. Detailed frontage controls in centres have been replaced (as they are no longer enforceable following the introduction of use Class E), with clear expectations retained for active ground floor uses. A wider range of town centre uses are also encouraged including childcare, affordable workspace, sharing economy etc.
- Following the introduction of use Class E by the government, the Council has also used its planning powers to protect commercial, business and service premises (within planning use Class E) in a number of areas in the borough, through the introduction of Article 4 Directions, to restrict permitted development rights to change from use Class E to use Class C3 (dwelling houses). We are unable to prevent changes of use within Class E however, which includes a



variety of uses including shops, offices, food and drink establishments, financial and professional services, creches, GPs and indoor sports facilities.

- The Council has also made an Article 4 Direction to restrict the change of use of a building from a launderette to use Class C3 (dwelling house), to protect launderettes.
- The Council recognises that the quality of the environment and public realm in the borough's town centres and high streets can have a significant impact on how well a centre performs and the Plan states that we will seek to secure contributions towards improving the public realm in our centres (Policy IE6). Further guidance on the health of our centres and potential environmental improvements that could be delivered is set out in the Camden Planning Guidance on Town Centres.
- The Plan supports the use of vacant shops for uses, including affordable workspace, circular economy uses (such as repair shops), artist studios and cultural activities.
- With regards to the promotion of independent uses in our centres Policy IE6 Supporting Town Centres and High Streets seeks to protect and enhance the distinctive character of our centres and also seeks to sustain specialist shopping areas, where there are higher concentrations of independent retailers. The policy also seeks to restrict proposals for the formation of larger units where a centres has an established role in accommodating independent and specialist retail.
- Policy A3 (Air Quality) and Policy A4 (Noise Pollution) address air quality and noise issues.
- Policy A4 (Noise Pollution) seeks to minimise the impact on local amenity from deliveries.
- Policy IE6 on supporting town centres and high streets has also been updated to support efforts to widen the range of evening and night-time economy uses, where this will benefit local residents and people working night shifts. The approach proposes that additional floorspace for such activity should be focussed in Camden Town town centre, designated Central London Frontages and in areas of the Central Activities Zone with established concentrations of such uses.
- Whilst we acknowledge the role that hot food takeaways can play in the community, it is widely accepted that they do not offer healthy food choices. Given the concerns about increasing levels of obesity in Camden, the Plan proposes to manage hot food takeaways in Camden on the basis of local evidence, to minimise harm to health and well-being.
- Policy SC2 sets out the Council's strategy for the protection of social and community infrastructure, recognising the valuable service that these spaces offer to Camden's communities.
- Policy SC6 Public houses seeks to protect public houses which are of community value, recognising the role that they play in the community and how they often serve the needs of protected groups.
- Whilst the Council doesn't have a specific policy on railway arches, the re-use of vacant railway arches to support a diverse range of businesses would be supported by Policy IE1 Supporting a Sustainable and Inclusive Economy, subject to wider considerations and conformity with other policies in the Plan.

## Representations on Climate Change

In total 251 representations were made on climate change by 52 consultees. Of these, 79 representations were received via commonplace and 172 representations were received via email.

30 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to climate change and sustainability?**

- The climate crisis should be at the heart of the plan as a prominent and overriding theme
- Policies CC1 and CC2 should place greater emphasis on the role of natural solutions
- Can CC2a (the protection of existing green spaces and promoting new appropriate green infrastructure) include private gardens?
- Current Local Plan is devoid of metrics to measure the plans success in helping to deliver climate and ecological emergency targets
- Not permitting gas boilers by 2035
- Make it clear what is allowable without planning permission, minimising the need for planning permission, ensuring that conservation standards are not overly demanding
- Measure, for new developments and refurbishments, the carbon emissions from construction, renewable energy, and sq m of roofs, floors, walls insulated
- For new buildings Camden needs to set the highest standard for energy efficiency and require heat pumps and renewables
- Adaptation of existing housing stock is not mentioned. Change policy to allow external cladding to all walls and installation of double / triple glazing where frames on street are like for like do not require planning permission
- Metrics needed to calculate heat island effect for all developments to include area of hard surfaces added/removed, natural soft surface added/removed, water added/removed
- Not permit air conditioning or excessive mechanical plant – nature based cooling to be added to all developments
- Value of trees and tree planting in mitigating the heat island
- Further controls are needed to ensure that features such as green roofs are not removed post planning
- There must be a policy on retention and refurbishment of buildings
- Greater focus on embodied carbon in existing structures
- Future policies, whilst supporting retrofit first, should recognise that retrofit will not always be possible or the best outcome on every site and allow for redevelopment in appropriate circumstances
- Applications should be assessed on a case-by-case basis and take into account Whole Life Carbon Assessments, as well as the adaptability of a specific building
- Can the assessment of resource efficiency apply to developments under 500 sq m floorspace
- A preference also needs to be given to low carbon materials including timber and reused materials, and a requirement for a “circular economy statement” as

required by the GLA for major developments, should be introduced for a wider range of buildings.

- To enable better use of materials, Camden's site allocations plan should provide for a circular materials hub

#### Biodiversity

- Bird nesting boxes / swift bricks should be planned for in all new builds and old sites protected
- Policies need to be updated to reflect changes in national and London policy on biodiversity net gain, tree cover, access to green space, the urban greening factor, and nature recovery strategies
- Stop approving garden extensions and rooms

#### **What should our future Local Plan policies on climate change and sustainability cover?**

- Policy should also consider the constraints of individual sites when assessing sustainability requirements, such as listed buildings, and enable a flexible, proportionate, approach to be taken
- Policies could go further on Sustainability improvements to listed buildings, providing greater clarity and certainty for building owners
- New concepts like the liveable city, 15-minute city and ecosystem services calculations need to be included in a new version
- The plan should also cover the energy supply in Camden, as the movement away from natural gas and the investment in the grid will be important
- Measures to facilitate the installation of external shading on both commercial and residential buildings to cope with much hotter summers
- Regularly revisit conservation area statements to ensure that the detail of what needs to be conserved is at the level needed for retrofitting
- The Plan should have a stronger commitment to support refusal of applications that involve less sustainable solutions such as even partial demolition
- Prioritise retrofitting and improvement before demolition
- Any future policy should recognise that there are a range of factors which influence the feasibility of retrofit and refurbishment and that, in certain circumstances, more extensive deconstruction and redevelopment will continue to be required to ensure that site capacity is optimised

#### Biodiversity

- Setting a greater than the minimum target for Biodiversity Net Gain, incorporating the Urban Greening Factor and linking to the emerging Local Nature Recovery Strategies for London
- A presumption for the retention of all trees and urban hedgerows of value, with robust incorporation of required Root Protection Areas on development sites
- More 'wildlife' hedges in Camden's open spaces which again provide habitat for wild creatures and improve biodiversity

#### Water and Flood risk

- Incorporate water management and resilience within the updated policies, as well as strong encouragement for natural flood risk management solutions

- Promote the uptake of nature-based solutions to build resilience to climate impacts, such as flooding, drought and overheating, and to absorb and store greater quantities of carbon
- Technical comments made on secondary aquifers and groundwater protection by the Environment Agency.

**How can the Local Plan minimise carbon emissions, promote a circular economy, encourage the retrofit of buildings and maximise the use of renewable energy?**

- Do not grant consent for air conditioning plant
- Camden should make it absolutely clear what building changes are lawful without the need for planning permission
- Camden should focus on retro-fitting in improving its housing, due to the Greenhouse Gas emissions impact of replacing whole buildings, and the significant emissions impact of building high rise residential and other blocks
- Policy should ensure there will be adequate provision of space for waste separation and collection on development sites
- In relation to applications to extend or refurbish homes, a condition of giving planning permission should be that investment is also undertaken to bring the property up to an EPC rating C at minimum
- All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption

Mitigation

- Renewable energy sources should be incorporated more into new builds so that they become the norm, and investing in solar panels on older buildings
- Clarify that installation of solar panels on any roof falls within Permitted Development subject to the conditions; allow PV installation on churches, schools, commercial buildings, and other public buildings, without the need for planning permission; explore and encourage group PV installation with whole street installations by suggesting designs and approaches
- Objections to solar panels are overwhelmingly based on aesthetics, which is a subjective consideration, while mounted solar panels make little or no permanent change to the fabric of heritage buildings. Therefore, our policies should reflect a desire to 'lend our roofs' to the climate crisis in the short and medium term
- Where developers are unable to achieve net zero targets for new or refurbished buildings, they should be required to pay into an offset fund that enables energy saving or renewable energy generation of the same value

Adaptation

- Incorporating natural solutions such as tree shading and green roofs/walls is cost effective in addressing energy consumption
- Give positive encouragement to people to carry out obvious measures
- Allow solar shading of south and west facing windows, walls and roofs
- The plan must embrace significant change in both performance and appearance of housing to achieve energy efficiency in winter and protection from excessive heat in summer

- To avoid uncertainty, we propose that it be stated clearly that the Permitted Development Order 2015 applies in conservation areas

#### Resource efficiency

- Minimise demolition, maximise re-use/repurposing of existing buildings
- Underline the importance of retrofit and encourage the deep retrofit of existing buildings. The embodied energy of existing buildings needs to be taken into consideration, and retrofit should be the default position for developers
- New policies to take embodied carbon into account should apply to all developments; policies should be strongly worded to discourage demolition, and to require the evaluation of a refurbishment option against any demolition proposal; evaluation should include the embodied carbon of material removed not just that in new construction work
- Circular economy initiatives such as building material libraries within the borough should be considered by the Borough
- Requirements for circular economy statements as in the GLA plan, but for a wider range

#### **How can the Local Plan reduce surface water flooding, improve air quality and address overheating?**

- Public points for charging electric bicycles are needed
- Current policy does not provide clarity on the current technologies or their differences, such as active cooling (air conditioning) and ASHP. Further clarity on the types of heating and cooling would be helpful for applicants, to avoid the need for additional and costly reports which may not be required

#### Air quality

- Does there need to be some mention of reducing emissions from NRMM as mentioned in the draft Camden Clear Air Quality Action Plan? Is it the case that by 2025, all of Camden will need to meet Stage IV
- Minimise highly-polluting construction vehicles producing huge amounts of NOx and PM10/PM2.5, by minimising new build and maximising re-use/repurposing of existing structures
- More green spaces can reduce overheating and ambient temperatures and improve air quality.
- More bicycle friendly paths and lockable bike sheds for public use to improve the proportion of people who commute on bikes rather than cars

#### Overheating

- Ban air conditioning. Prioritise alternative cooling via passive cooling, reversible ground source heating or aerothermal methods
- Increasing use of tree planting, SUDS, rain gardens, urban hedgerows and green walls captures pollution, tackles the urban heat effect and absorbs CO2 as well as enhancing the urban landscape and connecting scarce natural habitats

#### Water

- There should be better collection and use of greywater to reduce the volume of water requiring energy intensive and expensive treatment and pumping

- Reduce existing hard standing and limit paved patios in favour of fully permeable surfaces
- Require natural water features - especially in areas with underground water
- Developers must be required to provide wholly adequate SUDS drainage and not to increase rainwater run-off from their site above the green-field level
- Thames Water made comments in relation to water and waste water infrastructure, waste water management, sewer flooding and water efficiency.

### **Council Response**

- The Plan has an overarching development strategy whereby the Council will require developments to achieve net zero carbon emissions, optimise resource efficiency, and be designed to be resilient to climate change (see Policy DS1). Consideration for adapting to meet the challenges of climate change, address the causes of the climate emergency and work towards becoming net-zero is integrated throughout the Plan.
- The Plan sets out several targets including: minimising carbon emissions over the lifespan of the building/s in accordance with GLA Whole Life Carbon benchmarks, embodied carbon, energy use intensity targets, space heating demand targets, BREEAM targets, biodiversity net gain and urban green factor targets.
- Policies CC1 promotes the circular economy by minimising waste, increasing re-use, and reducing whole life carbon emissions in developments. This would include the use of natural and low carbon materials. The Plan also states that development needs to move away from the traditional extraction of virgin materials, manufacture, construction, and disposal to approaches which intend to keep buildings, materials, and components in use as close to their original form as possible. The local authority do not consider a site allocation would be the most appropriate way of taking forward a circular materials hub/library.
- Policy CC1 states that the Council will prioritise and enable the repurposing and re-use of existing buildings over demolition. Applicants will be required to justify proposed partial or full demolition. Policy D5 recognises that that historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building.
- Policy CC3 will require new build major applications, or major applications which involve substantial demolition and rebuild, to submit a Circular Economy (CE) Statement, following GLA guidance.
- The planning balance between heritage conservation and energy efficient will be considered in the development management process on a case-by-case basis.
- The draft Local Plan explains which retrofitting measures do not require planning permission. These are set out in national legislation, known as permitted development rights. It is not within the power of the Local Planning Authority to expand development rights beyond national legislation.

- Policy CC8 resists applications that include active cooling (air conditioning) and non-essential mechanical plant. Policy CC8 will require applicants to incorporate measures to cool buildings using materials, finishes, and greening where feasible. The Plan states that external shading for naturally cooling is an option where such features will not significantly detract from the character and appearance of a conservation area or listed building. Camden's Energy efficiency and adaptation CPG provides further guidance on active cooling.
- The Plan recognises the function of trees to mitigate the effects of climate change throughout, including providing greater canopy cover for greater cooling effects (see Policy CC8).
- Draft Policy CC4 will require applicants for all new build development and all development proposing substantial demolition to submit a whole life carbon emissions assessment as part of the planning application.
- All developments are expected to optimise resource efficiency through the draft Local Plan. Policy CC1 states that all development in Camden should respond to the climate emergency by reducing whole life emissions, by taking a whole life carbon approach. Policy CC4 requires all development minimises carbon emissions over the lifespan of the building(s).
- The Council has applied BREEAM excellent for non-residential schemes of 500sqm or more floorspace since 2017.
- Policy NE2 promotes biodiversity enhancement features such as bird and bat boxes.
- Matters regarding biodiversity net gain, tree cover, access to green space, the urban greening factor, nature recovery strategies, water management and flood risk are to be covered in the draft Plan.
- Policy NE2 will require biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions, and will expect developments to achieve the Urban Greening Factor scores set out in the London Plan.
- Policy NE2 will expect development to realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local opportunities for biodiversity gains identified in the Council's Biodiversity Strategy and emerging Nature Recovery Network. These are the Council's strategies in relation to biodiversity and nature.
- Policy NE3 states that the Council will seek to protect existing trees and secure additional tree planting in the borough. The policy states that the Council require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction'. Camden's Trees CPG explains this will include identifying tree constraints and Root Protection Areas (RPAs) in the pre-planning and design stage. The CPG advises that developers should avoid development within a Root Protection Area, including the routing of underground services and drains.
- It is not considered appropriate or reasonable to prevent all rear extensions. Proposed policy D4 states that extensions must be subordinate to the building being extended or altered and deliver biodiversity enhancements.
- Regarding energy supply, the Council will require all proposed major development within any identified heat network areas to fully explore opportunities to connect to existing or future planned energy networks (see Policy CC7). The Council will also require new buildings to be fossil fuel free (that is, not

connected to the gas grid, use non-combustion energy systems), ultra-low energy, use low carbon heat, and contribute to the generation of renewable energy on-site (see Policy CC5).

- As set out above, Policy D5 sets out the Local Plan approach to retrofitting in heritage properties. The programme for reviewing Conservation Area Statements is not itself a Local Plan matter.
- Policy D1 states that developments provide appropriate facilities for the storage, separation, and collection of all types of waste and recycling.
- The Draft Plan states that, where solar panels require planning permission and listed building consent, these will be supported provided that they do not harm historic fabric or significance of a heritage asset when balanced against the wider public benefit of tackling the climate emergency.
- The Transport department have a number of planned infrastructure programmes. This includes borough wide micro-mobility schemes which extending the Council's network of dockless e-bike and e-scooter hire parking bays and introduce a network of green micro-mobility hubs (including e-bike and e-scooter hire bays, standard and cargo bike parking, and car clubs).
- Draft Policy T2 states the Council promote active travel by prioritising walking, wheeling, and cycling in the borough, to improve health and wellbeing, reduce harmful emissions, improve air quality, help to tackle climate change, and deliver sustainable communities. The Policy sets out a number of requirements from development in order to promote cycling in the borough and ensure a safe and accessible environment for cyclists.
- The draft Plan refers promotes the use of air source heat pumps. It states that where air source heat pumps are proposed, a whole house approach to energy reduction is encouraged to ensure retrofit improvements work well together. Planning permission is not required for air source heat pumps providing that they meet permitted development criteria. Camden's Energy efficiency and adaptation CPG provides further guidance on what air source heat pumps are, how they work, and what issues applicants should consider.
- Draft Policy A3 requires all development to demonstrate how they plan to meet the GLA emission standards for Non-Road-Mobile-Machinery. The Council will apply the emission standards for the Central Activities Zone across the whole borough.
- The Plan will promote new and enhanced public open spaces and recognises their contribution to climate change (see Policy SC3).
- The Plan will promote cycling in the borough and ensure a safe and accessible environment for cyclists (see Draft Policy D1 and Draft Policy T2).
- Draft Policy CC9 will require all new buildings to include rainwater harvesting appropriate to the scale and nature of the development. The Draft Policy will also require major developments and high, or intense, water use developments, such as hotels, hostels, and student housing, to include a grey water system, unless it is demonstrated to the Council's satisfaction that this is not feasible or practical.
- Policy CC12 states that the Council will require all development to include permeable surfaces and seek to replace non-permeable surfaces where feasible. Policy D4 states that proposals for extensions and alterations to houses and flats will be required to deliver biodiversity enhancements in line with Policy NE2 (Biodiversity). The Draft Local Plan will highlight that front gardens provide an



opportunity to provide soft landscaping (planting) which can improve biodiversity as well as enhancing the character and attractiveness of the area.

- Policy CC1 seeks to protect and enhance existing green spaces and water sources, protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure.
- The draft Local Plan states that through the planning process, the Council will resist the excessive loss of garden space recognising its value as a biodiversity resource, including its potential to deliver greater biodiversity value in the future.
- Policy CC12 states that the Council will seek to control surface water run-off from development to reduce the risk of flooding. The Council will:
  - require all development to include permeable surfaces, incorporate green and blue roofs, and seek to replace non-permeable surfaces where feasible.
  - Resist proposals including impermeable surfacing unless it can be demonstrated to the Council's satisfaction that this is unavoidable.
  - Require all major development to reduce surface water run off rates to greenfield run-off rates, through the application of Sustainable Drainage Systems, following the drainage hierarchy of the London Plan.
  - Require Sustainable Drainage Systems to be designed to provide multi-functional benefits and be integrated into the development.
  - Expect sustainable drainage system proposals to meet national and local guidance to ensure they are adequately designed, built and maintained for the lifetime of development.
  - Require a drainage report to be submitted with all major applications. A drainage report for basement developments and other vulnerable development (Annex 3 NPPF) is to be submitted in areas identified at risk of flooding (Policy CC11) and Policy D6 Basements).
- The Draft Local Plan will require proposals for extensions and alterations to deliver energy efficiency improvements
- The installation of gas boilers does not require planning permission.
- Planning conditions secure the retention of green roofs, where approved.
- The Draft Local Plan promotes the adaptation of existing building stock. It states that building alterations should use materials and be constructed to reduce energy demand. This can be achieved using a simple built form, high levels of insulation, draught proofing, reduced thermal bridges (areas such as window and door joinery which allow heat to pass through more easily), and high-performance windows. The draft Plan also promotes the use of solar photovoltaic panels and air source heat pumps.
- London Plan Policy SI4 states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. This forms part of Camden's development plan. The Draft Local Plan does not specifically set metrics for calculating heat island effect for developments.
- Technical comments from the Environment Agency and Thames Water have been considered in the Local Plan review.
- The draft Local Plan supports local centres with facilities and services easily accessible to the local community.

- Policy NE4 seeks to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health.
- Policy C11 states that the Council will seek to ensure that development addresses and reduces flood risk to mitigate the impact of flooding on Camden's communities, both now and in the future. The Policy sets out a number of requirements for developments in terms of flood risk management.
- Policy CC6 will require renewable energy generation on-site must match, or be in excess of, the predicted annual energy demand of the building (EUI). Where a development is unable to achieve the quantity of renewable energy generation on site, as outlined in the policy, the Council will expect an offset payment based on the cost of providing that capacity if the space had been available. The offset payment will be secured through a legal agreement.
- The Draft Local Plan states that the Council is supportive of external wall insulation on side and rear walls where they are not predominately visible from the street or wider view. Planning permission is generally not required for external wall insulation for dwelling houses (except for flats or homes in a conservation area), providing the materials used match the appearance of the original house.
- The Draft Local Plan states that installation of secondary, double or triple glazed windows is supported. Planning permission for window replacement is required where they do not match the material, colour, size and design of existing window frames and profile or it relates to a listed building or building covered by an Article 4 Direction.

## **Representations on the Natural Environment**

In total 159 representations were made on the Natural Environment by 44 consultees. Of these, 55 representations were received via commonplace and 104 representations were received via email.

6 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to open space and biodiversity?**

- There is not enough open space and biodiversity: it is cosmetic planting in new builds, not properly done to last and not taken care of thereafter
- Requirements for additional natural greenspace should apply to all sites
- Require biodiversity net gains from all planning applications, both large and small, including front and rear gardens, landscape applications, extensions, tree applications
- The new Plan should give more weight to the protection of trees and green spaces. The 2017 Plan seems to privilege development over trees and, in practice, developments rarely achieve "a net gain in biodiversity and a range of wider environmental benefits".
- Keep as much open space as possible in the borough
- Include protection for undesignated spaces in Local Plans. Local green and open spaces are often at risk if not identified in Local Plans.
- In Belsize, many families with young children have to walk long distances to access a park which has the facilities needed (such as a toilet)

- The provision of green space in the 02 development is inadequate
- New public parks, nature reserves and SINC's should be created in Areas of Deficiency such as Holborn and Covent Garden to ensure there is sufficient green space for local residents. This can include under-used roads/ even whole streets or sections of streets
- Local Plan should give clear guidance on the current levels of deficiency in access to open space and nature
- Biodiversity needs to be better protected - enforcement should be tougher (including tree maintenance) and there should be more tree officers
- The Local Plan overlooks urban species that use buildings rather than open space (except for a very fleeting mention), the same applies to the Biodiversity Strategy 2022 and the national "net gain" calculation
- The Local Plan must be totally prescriptive about the amounts of green space and biodiversity to be provided in new developments
- How will success against "a significant enhancement in the borough's biodiversity" be judged; it should be measured and tracked annually
- Set quantum of open space per resident for private and public open space (monitored in line with the London Survey Method open space surveys)
- Set metrics to track quantum of unpaved area and habitat coverage: hedgerows, ponds, living roofs etc
- Track numbers of species, e.g. butterflies, bats, amphibians
- Record/track nos. additional trees and vegetation per development
- The Plan should deliver enhancements to SINC's recommended by London Wildlife Trust
- Local Ecological Networks / green corridors should be mapped, protected and enhanced and their condition tracked (annual increases targeted). Green corridors of trees in back gardens make a significant contribution to wildlife habitats and biodiversity, air quality, noise abatement and privacy screening
- Provide a clear definition of the width of biodiversity corridors and the minimum distance a building must be from one to ensure useful wildlife habitat is retained
- Bodies of natural water should be mapped in plan, and changes tracked
- Trees in back gardens may have little 'amenity value,' however they can still be very important to residents of surrounding buildings and should be protected
- Give more protection of tall trees and their canopies due to their importance for climate change and biodiversity
- The Camden Tree Planting Strategy 2020-25 (adopted by the Council in 2021) commits to the more ambitious target of planting at least 600 trees per year, and this should be incorporated in the Local Plan
- The Council must not support developer/insurance company attempts to remove mature trees due to suspected (unproven) subsidence
- Map all veteran trees, where not already, and ensure they have TPO protection
- All tree works in conservation areas need to be notified to the Council in advance
- If any tree is removed, then it must be replaced by a tree that contributes to BNG
- Selection of trees/hedges should include consideration of their ability to support insects
- Excessive tree crown reduction in private gardens should be highlighted.
- Ecological harm from glyphosate use should also be noted

- Support planting of wildflower verges between the footway and the carriageway, where space permits
- The Council should identify any derelict green sites or disused playing fields, and work urgently to bring these back into use otherwise they will become vulnerable to sale to developers, e.g. Mortimer Terrace
- Estate regeneration 'infill' schemes should not build over estate green spaces and gardens. New housing should only be constructed on genuine previously developed brownfield land. Residents should not be left with inadequate provision of green and communal open space

### **What should our future Local Plan policies on open space and biodiversity cover?**

- Be more ambitious
- Cease all garden development, this is a frivolous use of the earth's material and fossil fuels
- ALL trees and vegetation are valuable and far too many have been destroyed by developers or even by public services
- Appropriate levels of tree protection cannot be provided with two Tree Officers. You need significantly to enhance your Tree Team
- Always prevent the loss of any tree, unless there is unassailable proof that felling is necessary. The wood should always be retained in the garden as habitat. Once it is realised that approval for tree-felling is given only very exceptionally, the requests should die down
- Strengthen wording in Plan, e.g. "The Council may request a construction management plan for developments adjoining or within sites of high nature conservation value in order to protect biodiversity", this must be a 'requirement'; "the retention of trees and vegetation of significant amenity, historic, cultural or ecological value", 'require' not seek; "minimise any adverse impacts from development on retained and proposed trees and vegetation", change to 'prevent'.
- Offsetting the capacity of trees lost as a result of the development to absorb carbon must be a policy requirement
- Provide more detail in Plan on wildlife - what species are at risk or are already extinct in Camden, what actions will be able benefit those species?
- Avoiding disturbance habitats and species: how will this be monitored effectively?
- Define an "excessive part of the garden"; have limitations on size, position and method of construction of garden buildings
- SINCs must be considered sacrosanct, they provide opportunities to deliver Biodiversity Net Gain
- Set out the approach to Biodiversity Net Gain (make mandatory for almost all planning applications). Apply 10% minimum as suggested by Government or a higher threshold. How will on-site/off-site approach to BNG work and how will it relate to S106 and CIL??
- Have targets greater than the statutory minimum on Biodiversity Net Gain
- Refer to the Local Nature Recovery Network. Be "more, bigger, better and more joined up"
- Include targets for tree cover

- Include targets for access to greenspace including natural greenspace in line with Natural England's ANGSt and Woodland Trust Woodland Access Standards
- Give preference for native tree species from UK sourced stock for biosecurity
- The biodiversity section is not easy to find in the 2017 Plan under "Protecting Amenity"
- Require swift bricks in new developments.
- Protection of nesting sites: treat buildings in the same way as vegetated habitats and requiring ecological surveys where red-listed bird species may be present and mitigation where necessary.
- All new developments should include open space which is open to all. This should have a minimum of hard landscaping and maximum greenscaping
- More control needed of building in gardens on boundary of Heath with a clear definition of openness with guidelines on distance/ height
- The preservation of trees should, in almost all circumstances, take precedence over boundary walls, fences and garden structures
- Promote "moveable" trees to enhance areas of Camden where permanent plantings may not be feasible, e.g., near Streeteries and Parklets
- Subsequent applications to remove trees after initial planning permission have been granted must be treated as stand-alone tree applications and be dealt with by Tree Officers
- Introduce a reporting requirement for developers on tree planting when landscaping works are complete
- Use pollution maps to inform prioritisation of tree planting
- Prioritise tree species known to improve air quality in areas with high pollution
- The allergenic nature of the tree should inform species selection
- Policies on amenity/open space requirements must be realistic for high-density schemes with flexibility applied to any targets to allow for the right spaces to be provided in the right location
- It is difficult to see how large extensions, consuming many metres of garden, could result in BNG of 10%
- Strengthen the Plan in light of the appeal Camden at Jack Straw's Castle, 2020/1828/P
- Camden's subsequent guidance on public open space includes a genuinely good new set of measures around how spaces will be managed and their public use ensured. These should be more explicitly stated in policies in the new Local Plan wherever possible, to take to the next level of effectiveness
- Control cats, they are killing too many birds; publicise this and make owners feel responsible

### **How can the Local Plan enhance biodiversity and make Camden greener?**

- Never chop a tree unless it is causing a real problem with proof of the problem provided
- There are some green areas that could be 'given' to local people for gardening
- There needs to be a long-term vision which is adequately funded and safeguarded against depletion because of short term funding crises
- Approach to enhancements- can this be extended to smaller sites?

- Encourage and support (e.g. with CIL) local greening initiatives such as KTNF's Green Gateways and TKT's rewilding projects. Involve local people as much as possible in planting and looking after trees in their street
- Engage school children and students with tree planting projects
- Have a unified plan for new green spaces & corridors. Develop and embed a Camden Nature Recovery Plan within the Local Plan, that also addresses how development contributions will help deliver upon it. Will need to identify land that won't be developed, but can be enhanced to help create viable ecological corridors connecting with SINC's, parks and other greenspaces. Camden should work with neighbourhood forums and associations as partners in its design of nature recovery networks
- Tax paved gardens
- Be tougher on developments encroaching on private gardens
- Prohibit artificial grass. Avoid plastic turfs, paving and buildings in gardens
- Management of Camden's parks and open spaces does not give regard to biodiversity
- Stop allowing residents to fell trees in Conservation Areas. Lobby for the S211 law to be changed to give Councils more powers in this regard
- Plant wildflowers at the base of street trees
- Hold annual 'Camden in Bloom' both Garden and Window-Box competitions
- Ensure that replacement planting of trees of equivalent value takes place or, if that is not possible, that a financial contribution is obtained to finance replanting by Camden Council in a nearby location
- The Council should not be developing overly prescriptive policies relating to open space and biodiversity: policies should have sufficient flexibility within them that enables the decision maker to consider the provision of open space and biodiversity on a site-by-site basis taking into account the competing needs of development sites and the requirements of other planning policies
- Requirements for 'additional trees' should be amended to reflect BNG
- Where proposals improve biodiversity, can the Plan promote 'reversing' the paving over of front gardens?
- 'Right tree for the right site': distinguish between "ecology" and 'biodiversity'
- Avoid erecting walls and barriers that stop movement of terrestrial wildlife; infill of gaps between buildings can have the same effect
- Ensure careful management of lighting – can reduce the activity and survival of nocturnal species like moths and bats
- Avoid disturbance/pollution of waters and drains leading onto the Heath
- Create 'shelters' for wildlife nesting, feeding and resting
- Encourage planting of fruit bearing trees and wildflower strips
- Build wildlife accessible ponds
- Gardens near to Heath – give priority to enhancing their biodiversity value and ecological character (they are corridors for wildlife)

### **Other comments**

- Paper provided on "Bringing the Heath home: A proposal for a biodiversity-rich corridor on a future Murphy's Yard development"

## Council Response

- Draft Policy SC3 Open Space has been updated to ensure our approach is expressed as clearly as possible on the protection of existing public open space and the provision of new spaces. The policy has been updated to integrate and refer to guidance set out in Camden's Open Space CPG. The policy provides additional guidance on the design and management of public open spaces to align with other policies in the Plan, particularly those relating to safety, inclusivity and accessibility, opportunities for sports and play, and mitigating the impact of climate change, as well as the requirement of management plans, landscaping schemes and landscape management plans. Policy SC3 requires developments, which meet certain thresholds, to contribute to the provision of new public open space. The term "public open space" is defined in the Plan as open space that can be used and enjoyed by all the community. Developments that provide public open space are required to make provision for its long-term management and maintenance. Policy D1 requires developments to incorporate outdoor amenity space. The Local Plan maps areas of open space deficiency and seeks to increase provision where possible.
- Policy SC3 safeguards open space on housing estates while allowing flexibility for the re-configuration of land uses. It sets out criteria that are taken into account when assessing development proposals.
- The Plan protects all designated public open spaces, which include Sites of Importance for Nature Conservation (SINC). The London Wildlife Trust has carried out a review of all SINCs as part of the Local Plan update. Policy SC3 on open space sets out how the Council will secure additional open space in the Borough and financial contributions to improve existing spaces, including areas of natural greenspace.
- It is not possible to protect every undesignated space in the Borough, however draft Plan Policy NE1 states the Council will protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible.
- Policy SC3 seeks temporary provision of public open space where opportunities arise. This could include on cleared, vacant or under-used sites
- The Local Plan will contain measurements for biodiversity including biodiversity net gain targets and urban greening factor. It also contains standards for the delivery of public open space.
- Policy NE2 will expect developments to achieve the Urban Greening Factor scores set out in the London Plan. In accordance with the Environment Act 2021 NE2 requires biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. Biodiversity net gain will apply from January 2024 for developments in the Town and Country Planning Act 1990, unless exempt. It will apply to small sites from April 2024. The government is due to publish further guidance and information on the operation of biodiversity net gain and metrics.
- In line with draft Plan Policy NE3 the Council will seek to protect existing trees and secure additional tree planting in the borough. The policy resists the loss of tree(s) of value and proposals which may threaten the continued wellbeing of such trees. The Council will make Tree Preservation Orders where necessary to protect specific trees of value.
- The policy ensures that where trees are to be retained on developments, they are positively integrated into the design and layout of a proposed scheme. Trees that

are to be retained are to be satisfactorily protected both during and following the demolition and construction phase of development in line with British Standards.

- Policy NE2 states that the Council will address the potential of both direct and indirect impacts on habitats and species such as light pollution (both spread and duration) and risk of disturbance. This will include artificial lighting.
- Policy NE3 states that the Council will require replacement trees and/or vegetation to be provided where the loss or harm to the wellbeing of significant trees and/or vegetation has been justified in the context of the proposed development. The Council will prioritise securing replacement trees on-site. Where it can be demonstrated to the Council's satisfaction that replacement trees and vegetation cannot be provided on-site, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site.
- Policy NE3 requires developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. A detailed landscaping scheme and landscape management plan must be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development. The acceptability of these details would be considered in the development management process and secured by way of planning condition. Any failure by an applicant to comply with the tree planting details submitted will be a matter for Planning Enforcement.
- In terms of strengthening the wording of the Plan in accordance with the suggestions received, Policy NE2 Biodiversity recognises that demolition and construction can pose a significant risk to habitats and species, including green corridors and expects construction management plans to provide information on how habitats will be protected during building work. Draft Policy NE3 states that the Council will resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The Plan has also been edited to ensure applicants minimise any adverse impacts from development on retained and proposed trees and vegetation *as far as possible*.
- Policy SC3 will require that new or enhanced public open space is designed, where appropriate, to provide free, publicly accessible toilets suitable for a range of users. It will also require new or enhanced public open space to be designed, where appropriate, to connect to and integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity.
- The planning application for the O2 redevelopment was considered by the Council's Planning Committee in Spring this year.
- Policy NE1 states that the Council will secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor. Policy SC3 ensures that new or enhanced public open space is designed, where appropriate, to connect to and integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Linear Open Space/ Habitat Corridors are identified on the Local Plan Policies map and protected. The Green Spaces department will publish a strategy named "Develop the Camden Nature Recovery Network: identify core areas, corridors and stepping stones" scheduled for Autumn 2023.



- Policy NE2 states that the Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the Borough. The Council will: expect development to realise benefits for biodiversity through layout, design and the materials used in their built and landscaping elements. Policy NE2 resists development where it is likely to worsen deficiencies in access to natural greenspace or result in unacceptable impacts on biodiversity in the neighbourhood.
- Policy NE2 seeks biodiversity enhancements commensurate with the scale of proposed residential and non-residential extensions and alterations, including the provision of species features such as bird and bat boxes.
- Policy NE2 will protect designated nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors and stepping stones.
- Policy NE2 states that the Council will consider the potential of both direct and indirect impacts on habitats and species such as shading, light pollution and risk of disturbance.
- The Council's Tree Planting Strategy has been referred to in the Plan, where relevant.
- The permissibility of removing trees is considered in the development management process, on a case-by-case basis.
- The TPO of trees and resourcing within the Tree team are not part of the Local Plan update. Tree works in conservation areas are part of a separate process. Tree applications are assessed on their own merits.
- The Council's emerging Nature Recovery Network (a network of designated and non-designated wildlife sites and corridors for wildlife) will map the opportunities where routes for wildlife can be improved or designated sites buffered through extending biodiverse planting and landscaping. Policy NE2 will expect development to realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local opportunities for biodiversity gains identified in the Council's Biodiversity Strategy and emerging Nature Recovery Network. These are the Council's strategies in relation to biodiversity and nature.
- There are numerous large private gardens adjacent to the Heath that are designated as open space. Controls relating to specific gardens on the boundary of the Heath is not considered appropriate in a borough-wide Local Plan and may be more appropriate for inclusion in a neighbourhood plan.
- The Local Plan states that through the planning process, the Council will resist the excessive loss of garden space recognising its value as a biodiversity resource, including its potential to deliver greater biodiversity value in the future. It will be a planning judgment on a case-by-case basis on whether development would result in the loss of an excessive part of the garden or garden space which contributes to the character of the townscape.
- Camden's Tree Planting Strategy 2020-2025 sets out the aim to increase the canopy cover by a minimum of 3.7% by 2045. This will partly be delivered by increasing planting on private land, and helping developers and residents make the correct decisions on planting trees, facilitated through the development plan.
- Camden's Tree Planting Strategy 2020-2025 states the main criteria for species selection is "the right tree for the right site", ages and species diversification.

Species that improve air quality and native species are also considered when possible. Trees triggering allergies is also acknowledged through species selection in Camden's Tree Planting Strategy 2020-2025. The 'right tree for the right place' approach is promoted in the Camden Planning Guidance: Trees (2019) and Local Plan update.

- Camden Planning Guidance: Public Open Space (2021) sets out distance thresholds for types of public open space.
- Certain protected species are protected by law. This includes all wild bird species, their eggs and nests.
- Matters relevant to openness in any particular case are a matter of planning judgement.
- In terms of monitoring, once a development has been completed, management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential. Monitoring can confirm that relevant environmental measures have been implemented successfully. Maintenance and monitoring may be secured through a planning condition or legal agreement in the event of an approval.
- The appeal decision for Jack Straw's Castle (appeal reference: APP/X5210/Y/20/3261841 & APP/X5210/W/20/3261840) was concerned with the provision of public open space. The Inspector determined that the size and quality of private outdoor space provided for the two dwellings to be inadequate in accordance with the standard of 9 sqm per resident. This standard is explicitly stated in Policy SC3 of the Local Plan update.
- The Local Plan update introduces a Food Growing policy which states that the Council will support food growing and community food growing in Camden.
- Policy T1 states that the Council will require development to contribute towards the delivery of highway greening measures.
- Involving the community in planting and caring for trees is an aim of the Camden Tree Planting Strategy 2020-2025, separate from the remit of the Local Plan update.
- A number of comments received are outside the scope of the Local Plan and/or the planning systems. These include:
  - Areas of biodiversity (taxing or requiring the reversal of paved gardens, banning artificial grass, the control of cats, Glyphosate use, detailing and/or tracking what species may be at risk or are already extinct in Camden and what actions will be taken, building ponds, set metrics to track quantum of unpaved area and habitat coverage)
  - Trees (Section 211 notices, any suggestions regarding Council-owned Street Tree planting, highways greening including planting of wildflower verges between the footway and the carriageway, KTNF's Green Gateways and TKT's rewilding projects, involving the community in tree planting, creating public plant-growing competitions, moveable trees, number of trees/vegetation planted).
- The context of specific development sites and applicability of the requirements of the development plan, are part of the planning balance in the development management process.
- Policy NE4 seeks to ensure that development avoids the pollution of groundwater sources to protect the water environment and public health.
- Waterways are included in the Local Plan definition of public open space.

- As part of the 'call for views' which took place as part of initial engagement on the Local Plan review there was an opportunity to submit additional open spaces for consideration for designation. No representations were received.
- Tree Preservation Orders are separate to the Local Plan process.
- The operation of policies takes into account the specifics of each individual proposal and location on a case by case basis.
- Excessive tree crown reduction in private gardens will not require permission in most instances.

## **Representations on Community, Health and Wellbeing**

In total 54 representations were made on community, health and wellbeing by 20 consultees. Of these, 12 representations were received via commonplace and 42 representations were received via email.

0 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to supporting communities, health and wellbeing?**

- General support for the current Local Plan's approach to health and wellbeing
- The existing plan quite rightly points to the health inequalities in the borough but the policies in the Plan have not closed the gap. More ambitious, specific, time-related policies are needed in the new plan to address health inequalities
- The Local Plan needs to ensure that local health care and transport links are an integral part of every community
- 'Lifetime communities' concept sounds good but what about people trapped in unsuitable housing (such as wheelchair users) – how do they live their life if there isn't adequate social housing
- Living and ageing well must properly reflect the needs of the elderly and less mobile
- Concerns about the O2 centre proposal and its impact on the area

### **What should our future Local Plan policies on supporting communities, health and wellbeing cover?**

- The Plan should be as explicit as possible in supporting and enabling Camden to achieve our objectives as a "population health borough" – one that is holistic and recognises the social determinants of health and is enabling of our ability to influence these positively through all levers available.
- The revised Plan should align with current health provider thinking on how to manage their estates and best deliver their services. Increasingly, NHS Trusts are reliant on the redevelopment of their own sites to fund improvements to services. Policy should recognise this and flexibly apply land use and other development management policies
- Developers should contribute towards additional social infrastructure to meet the needs of new populations in developments
- Improving security and CCTV in known crime spots
- Provision of green spaces in new developments

- The Plan should consider needs for sports and recreation including those run by the City Corporation (Hampstead Heath) and the Royal Parks
- Metropolitan Police proposed seeking Section 106 contributions towards policing infrastructure in connection with new major developments referable to the Mayor.
- The Local Plan should provide explicit support for healthcare facilities where they can meet an identified need, in line with the London Plan.
- The Local Plan should strongly support educational uses and the important role of UCL. This should be reflected in policy, including in the approach taken to changes of use and planning obligations where new educational uses are proposed.

### **How can the Local Plan create safe, strong and open communities and support good health and wellbeing?**

- Ensure the major health issues facing the borough are identified to help address the wider determinants of health.
- Important Health evidence base documents include: The Camden Joint Strategic Needs Assessment, Health and Wellbeing Strategy, the emerging strategies of the North Central London Integrated Care System and the Integrated Care Board and the Camden Borough Partnership.
- By including clear, measurable policies that protect local services, infrastructure, community facilities and green spaces.
- More creative thinking is needed on how new development funds the running costs of facilities.
- All new development should be required to mitigate its impact on (and/or demonstrably improve) health and social infrastructure
- The NHS North Central London Estates Strategy identifies Belsize Priory, Kilburn/West Hampstead, Gospel Oak, Bloomsbury and King's Cross as high growth areas potentially requiring capital investment for health infrastructure.
- The ICB is keen to work with the Council to secure additional capacity of healthcare accommodation to meet current and future need
- The expansion of capacity within existing health sites is often the preferred solution with developers' contributions secured to ensure this can happen in parallel with the new population arriving.
- Resist further loss of open space and green space.

### **Other comments received:**

- The Plan should mitigate mechanical plant's impact on residential amenity.
- Sport England consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the emerging Local Plan and these should be based on a robust and up-to-date evidence base, such as Playing Pitch and Built/Indoor Facility Strategies.
- The Local Plan could link to Active Design
- The Council should consider sports uses to be acceptable on employment sites
- The empty coin-op launderette on Cleveland Street should be protected and brought back into use.

- Public toilets could be delivered from planning gain and incorporated into any new development with running costs included. Toilets need to be open long hours, accessible to all and be staffed.
- Somers Town is sited between two growth areas. There is concern that health services are not keeping pace with population increases.

### **Council Response**

- The approach to improving health and wellbeing in the Plan has been updated to ensure we are taking a population health approach and reducing health inequalities, in line with the Council's Health and Wellbeing Strategy.
- The need to deliver healthy and sustainable communities is embedded throughout the Plan and many measures set out in other policies will also play a part in promoting population health and wellbeing and addressing health inequalities. This includes protecting existing, and requiring the provision of new, social infrastructure to support communities, and promoting healthy and sustainable transport.
- Policy H8 provides for supported housing specifically for older people, homeless people and vulnerable people. Other policies in the Plan (such as Policy H6 on housing choice and mix and Policy H7 on large and small homes) seek a range of housing suitable for general housing needs, including the needs of those older people who do not require supported housing. The supporting text to Policy H8 states that the Council will seek to maximise opportunities for people to live independently in their own homes or in homes designed to meet general housing needs. Policy H6 seeks to address the mobility issues by ensuring that new homes are designed to be accessible and adaptable and that a proportion of new homes are wheelchair adaptable or accessible dwellings.
- Policy SC1 will support the provision of new or improved health facilities, in line with the North Central London's Integrated Care System and NHS England's requirements. Within the Integrated Care System an estates team is responsible for all NHS health care buildings and facilities and must be consulted on any proposals for new or replacement public health care buildings in Camden.
- Policy SC2 states that the Council will work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of our community and support the delivery of services.
- Policy SC2 states that the Council will seek planning obligations to secure contributions towards new and improved social and community facilities and services to mitigate the impact of development. This would include healthcare facilities.
- The term social and community infrastructure in Policy SC2 includes healthcare facilities. Policy SC2 supports the provision of new, improved and extended social and community infrastructure proposals subject to criteria, and compliance with the other relevant policies in the Local Plan.
- The Plan acknowledges the important contribution educational institutions play in the success of the borough, including UCL. This is reflected in Policy SC2 which supports the provision of new, improved and extended social and community infrastructure and Policy H9 which supports purpose-built student accommodation, both subject to criteria.

- Policy SC2 requires new, improved or extended social and community infrastructure can demonstrate to the Council that funding arrangements are secured for the future maintenance and management of the facility.
- It also supports the provision of new, improved and extended social and community infrastructure where proposals can maximise opportunities for shared use and co-location of facilities, where practicable.
- Policy SC2 requires new, improved and extended social and community infrastructure, where practicable, to provide free, publicly accessible toilets, including Changing Places toilets where appropriate. Furthermore, Policy S6 of the London Plan 2021, which forms part of the development plan, requires large-scale developments that are open to the public to provide, and secure the future management of, free publicly accessible toilets.
- The term social and community infrastructure in Policy SC2 includes laundrettes. Laundrettes are therefore protected in accordance with this policy. It is not possible for the Local Plan to mandate that specific properties are brought back into use.
- The term social and community infrastructure in Policy SC2 includes indoor and outdoor sports and recreation facilities. Policy SC3 requires new or enhanced public open space to be designed to, where appropriate, provide opportunities for physical activity and play. The evidence base for sports and recreation is being reviewed and updated as part of the Local Plan review. The Plan promotes active travel and ensures the design of environments can help people to lead more physically active and healthy lives. This is in broad alignment with Sport's England's 'Active Design' principles. The location of new sports and recreation facilities would have to comply with the requirements of the relevant policies.
- Policy SC3 seeks to protect public open spaces and secure new and enhanced public open / green space from proposed developments that meet specific thresholds.
- Regarding Section 106 contributions for policing infrastructure, planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition and they meet relevant policies and the statutory tests (i.e. necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind).
- Policy A1 seeks to protect the quality of life of future and existing occupiers and neighbours in Camden. The Policy resists proposals that cause unacceptable harm to amenity, which includes consideration of noise and vibration levels. Policy A4 seeks to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life. These policies would apply to proposed mechanical plants.
- Policy A2 will require development to contribute to community safety and security. The Policy will require development to be designed to include security measures, where appropriate.
- Policy NE1 states that the Council will preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath. The Plan recognises the importance of designated open spaces such as parks, squares, and other amenity spaces.

- The planning application for the O2 redevelopment was considered by the Council's Planning Committee in Spring this year. The allocation for this site in the Local Plan reflects this decision.

## **Representations on Design and Placemaking**

In total 107 representations were made on design and placemaking by 23 consultees. Of these, 21 representations were received via commonplace and 86 representations were received via email.

2 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to design and placemaking?**

- Policy D1 is considered to be a good policy. Council should continue to promote seeking developments that integrate with their surroundings, respect the local context, are inclusive and accessible, require careful assessment of tall buildings, and provide housing with good natural light and insulation, and promote health and wellbeing of all residents.
- There needs to be a stronger presumption against over-development, to favour retention of human scale and contextual development, with an emphasis on retention of existing buildings.
- There should be restrictions on locations where tall buildings can be built (more than 8 storeys).
- Ensure there are no areas of green space deficiency
- Policy D1 - The policy should state that development that is not of good design will be refused
- In respect of policy D1 the following criteria should be added to include materials, heights, massing and landscape character and boundary treatment
- Policy should ensure important gaps between buildings in Conservation Areas are maintained at ground and upper-floor levels
- Policies should focus on place making as a whole and encourage and support inclusive, safe design ensuring all development is accessible to Camden's diverse communities. Safety, for all, should be embedded in the design of new development from inception.
- More reference needs to be made to meanwhile spaces in the long gaps before construction takes place where community initiatives can grow.

### **What should our future Local Plan policies on design and placemaking cover?**

- Resist and discourage overdevelopment on existing large sites in particular by large institutions
- Prioritise mid-rise building
- Restrictions on the locations where tall buildings (i.e.. more than 8 stories) can be built and provide guidance on where tall buildings may be appropriate
- In accordance with London Plan D9, tall building locations should be identified in the Local Plan and in individual site allocations. Suggested flexibility on heights rather than being prescriptive in order to take account of site-specific

circumstances and to be site specific so heights can be discussed through the planning application process. Tall building locations should be identified on a map.

- Tall buildings will need to have regard to their impact on their setting especially to avoid any negative impact on conservation areas in which they are sited or which they are adjacent.
- The future Local Plan policies should recognise that a lot of historic buildings and non-designated heritage assets within the Borough are no longer fit for purpose and promote a flexible approach to their redevelopment.
- The plan should provide shopfront policy and design guidance on increasing pop-up shops and meanwhile spaces
- Design and materials: policy text should include references to low/no carbon materials, like timber and recycled materials under a standard.
- Cultural: more plaques, signs denoting the historical significance of buildings or areas
- There should be clear policies to support the integration of new development with existing heritage assets. There should also be clear direction in respect of tall buildings, again ensuring that this does not become overly prescriptive and inadvertently stifle architectural expression.
- Policies in relation to design and placemaking should align themselves with London Plan Policy D3 specifically, which outlines a design-led approach to optimising site capacity.
- An update and review of Conservation Area Statements should be considered.
- Artificial lighting levels: could the Plan be clearer that this applies to residential development as well? Light pollution can also be problematic in lower density areas.
- Promoting the provision of associated high quality improved and functional public realm, including cycle parking should be covered
- Wording in general should be stronger than encourage
- Historically more weight has been given to conservation rather than climate mitigation. Words have to be found which redress the balance in terms of renewables and energy efficiency measures in the light of the climate emergency
- A clearer emphasis on a preference for refurbishment/retrofitting over demolition and rebuilding should be part of the policy, including in relation to heritage assets
- Need to promote inclusive access in historic buildings
- 'Lifetime neighbourhoods' requirements should be included in planning agreements.
- Guidance on protecting views within conservation areas not just to/from. Having regard to the impact on local views across the Borough and the streetscapes within the Borough
- Guidance on better protection of heritage assets in poorer areas and outside Conservation Areas
- Boroughs should undertake character assessments of their areas as part of plan-making.
- A presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.



## **How can the Local Plan promote good design and shape public spaces to be safe, accessible and welcoming for everyone?**

- Promoting the retention of human scale and better public realm, favouring pedestrians and cyclists
- Safety is the most factor that any design should consider.
- The design of any new spaces with public access created by new development, or affected by new development, should be designed to address all age groups, ranges of mobility, and safety in day-time and night-time. This affects seating, planting, lighting and other street furniture. Inclusive design should be promoted and aimed for with all groups considered.
- There should be more participatory options to allow local community participation and involvement in plan making.
- Higher density development should be encouraged in accessible locations
- An updated local list and open space list is required.
- We welcome the objective of 'ensuring our public spaces, public buildings and council-led developments reflect the shared history, culture and diversity of Camden'.

### **Other comments received:**

- Policy needs to ensure reference to importance of trees and their preservation within conservation areas and how these generally contribute to the character of the conservation area and, those which contribute positively, including in rear gardens
- Efforts to improve Conservation Area and Management Plans are recommended
- Reference to the potential that design codes may be developed and that these may be developed in conjunction with neighbourhood fora.
- Adding more on what the Council expects with regard to landscaping including considering introducing a biodiversity metric recommended.

### **Council Response:**

- It is proposed that the draft new Local Plan will retain and update Policy D1 and this will reflect the design matters mentioned in the representations received. The plan's approach to tall buildings will be set out in Policy D2.
- Proposed Policy D1:
  - requires that development responds positively and sensitively to local context and character through layout, orientation, scale, height, bulk massing, proportion, appearance and materials
  - states that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions
  - requires development to consider the use of sustainable materials and sets out design policies for the public realm
  - states that development will be required to respond to local views and preserve protected views.
- The Plan requires development to meet the highest practicable standards of accessible and inclusive design so it can be used safely, easily and with dignity by all; is safe and secure and is designed to minimise crime and antisocial behaviour.

- Policy D1 will require public spaces to be well located; be of a high quality; and be designed to be safe, secure, welcoming, uncluttered and accessible for all. Policy T1 states that the Council will prioritise walking, wheeling, and cycling.
- 'Lifetime neighbourhoods' are now referred to as 'inclusive neighbourhoods' in the London Plan 2021. The GLA states that inclusive neighbourhoods opens the concept of lifetime neighbourhoods out, in line with the principles of inclusive design to ensure that neighbourhoods are welcoming, barrier free and inclusive for everyone. The principles of inclusive design are considered in the draft Camden Local Plan. Policy D1 B viii states that the Council will require developments to meet the highest practicable standards of accessible and inclusive design so it can be used safely, easily and with dignity by all.
- Policy D2 states that the Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns). Policy D2 states that locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on the Policies Map. The Plan's approach to tall buildings needs to be in line with the London Plan and we have therefore identified locations where tall buildings may be suitable. Guidance on building heights for specific sites is set out in the relevant site allocation policies. The Council will assess proposals for tall buildings against proposed Policy D2 on tall buildings, the London Plan tall buildings policy and design criteria in Policy D1.
- Local Plan Policy D2 states that for proposals for tall buildings the Council will give particular attention to the historic context of the building's surroundings.
- Policy SC3 will protect existing and promote provision of new public open spaces.
- Policy D5 on heritage states that the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. This includes, where relevant, preserving gaps between buildings if they form part of the character or appearance of the area.
- Policy D5 protects heritage assets across the whole borough.
- Policy D5 states the Council will preserve trees and garden spaces which contribute to the character and appearance of a conservation area, or which provide a setting for Camden's architectural heritage.
- The Plan promotes the use of 'meanwhile' and temporary uses where opportunities arise in cleared, vacant or under-used sites.
- Policy CC1 states that the Council will prioritise and enable the repurposing and re-use of existing buildings over demolition. Policy D5 recognises that historic buildings including those in conservation areas can be sensitively adapted to meet the needs of climate change and energy saving while preserving their special interest and ensuring their long-term survival. In assessing applications for retrofitting sustainability measures to historic buildings the Council will take into consideration the public benefits gained from the improved energy efficiency of these buildings, including reduction of fuel poverty. These considerations will be weighed up against the degree to which proposals will change the appearance of the building, taking into consideration the scale of harm to appearance and the significance of the building.

- Policies CC1 promotes the circular economy by minimising waste, increasing re-use, and reducing while life carbon emissions in developments. This would include the use of natural and low carbon materials. The Plan states that development needs to move away from the traditional extraction of virgin materials, manufacture, construction, and disposal to approaches which intend to keep buildings, materials, and components in use as close to their original form as possible. In support of this Policy CC3 states that the council will require all developments to optimise resource efficiency by minimising the amount of materials required and using material with low embodied carbon content. All major development will require a Circular Economy Statement to demonstrate this. Separately, BREEAM also applies sub-targets of the available credits for materials.
- Plaques and signage will be supported where they comply with relevant policies in the Plan.
- Indicative capacities for allocated sites have been informed by a design-led approach when appropriate.
- Policy A1 states that when assessing planning applications, the Council will consider, amongst other things, impacts of artificial lighting levels. This is supported by the Council's Amenity CPG that certain artificial lights can cause a nuisance, which includes domestic security lighting, and that should be considered, and mitigated, in terms of its impact. Light itself, and minor domestic light fittings, are not subject to planning controls.
- Plan Policy T2 expects development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities.
- The Local Plan acknowledges that the listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.
- The Plan takes an area-based approach to support and guide new development in the borough.
- The Council will expect applicants to engage with local communities on the design of schemes as part of the planning application process. Communities can choose to use neighbourhood planning powers to prepare their own plans.
- The list of designated open spaces will be updated as part of the Local Plan review. The Local List does not form part of the Local Plan or its review.
- Policy NE2 Biodiversity will expect developments to achieve the Urban Greening Factor scores set out in the London Plan.
- Updates to Conservation Area Statements/ Appraisals /Management Strategies, Character Assessments and Design Codes do not form part of the Local Plan review. There is a Camden Character Study, which forms part of the evidence base.
- Policy SC3 requires developments, which meet certain thresholds, to contribute to the provision of new public open space in accordance with standards set out in the Local Plan. The term "public open space" is defined in the Plan as open space that can be used and enjoyed by all the community. Policy D1 also requires developments to incorporate outdoor amenity space. The Local Plan will map areas of open space deficiency.
- Policy D8 sets out the Local Plan's policy on shopfronts. Policy D8 will apply to meanwhile and pop-up uses, where relevant and appropriate. Policy D8:

- States that the Council will expect a high standard of design in new and altered shopfronts.
- Sets out design considerations in the planning assessment of new and altered shopfronts.
- Resists the removal of shop windows without a suitable replacement and ensures that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.
- Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention.

## **Representations on Sustainable Transport**

In total 96 representations were made on Sustainable Transport by 35 consultees. Of these, 49 representations were received via commonplace and 47 representations were received via email. 6 agreements were also received through commonplace.

### **Do you have any comments on the Local Plan's current approach to transport and movement?**

- Support for the existing approach to transport and movement within the current Local Plan, which seeks to prioritise walking, cycling and public transport as a means of sustainable travel.
- Support for the approach which seeks to make environments more pedestrian friendly.
- Need to recognise that not all people can partake in walking or cycling. Disabled people and elderly people may rely more on using the car.
- Planning obligations should include contributions to towards public transport, bus stops, shelters, signage, toilets, baby changing facilities, step free access etc.
- Support for 15-minute city approach – but need to explain what this is.
- Need to reduce street parking spaces in Camden and invest more in cycle lanes and better pedestrian pathways,
- The Plan makes no mention of LTN's or Safer School Neighbourhoods (School Streets)
- Transport strategy in the Plan needs to be updated to take account of changes over the last 5 years e.g. EV's, e-bikes, commuting, WFH, on-line shopping and leisure travel patterns. Para 10.23 references to Crossrail 1 project (Elizabeth Line) and West End Project
- Policy which restricts vehicle size, use and ownership would be welcome.
- Support for approach to promoting cycling and suggestions that the policies could go further by adopting the use of higher cycle parking standards and requesting a standard CIL/S106 contribution from development not able to implement them.
- There should be more flexibility with regards to cycle parking standards in central London.
- Contributions should be sought for all public transport modes, not just the bus network.

- There should be step-free access provision at all stations within Kentish Town

### **What should our future Local Plan policies on transport and movement cover?**

- Add garages in exchange for no new car permits like in Hampstead NP.
- Para 10.20 Re-developments – should be applied in practice.
- Continue to prioritise sustainable modes of travel in line with national and regional planning policy objectives.
- Reduce car ownership/use, promote pedestrianisation and conversion of single yellow lines to double yellow lines or 24/7 bus lanes or cycle lanes.
- Road junctions should be of the raised table format to slow cars down at junctions and make journeys easier and safer for pedestrians.
- Retention of all bus services with increased frequencies, more eco buses.
- More EV charging points and infrastructure for those without drives/garages.
- Access to key services.
- Consideration of the transport impact of a development must be focussed on improvement rather than simply not making things worse.
- Future policy should place greater emphasis on the role of electric vehicles (EVs) and associated EV fast charging facilities/infrastructure to reflect the modal shift in transport that is taking place.
- Plan should support the remodelling of existing petrol filling stations to facilitate new technologies such as electric vehicle charging stations or the provision of electric vehicle charging points.
- More street trees.
- The Plan should set out the strategy on how to make Camden car-free, reduce the noise and congestion by delivery trucks to make everyone, including the elderly and children, feel safer on streets.
- Pedestrians should have priority.
- Further consideration should be given to the cycle parking requirements for educational developments and how existing campus cycle parking can meet such requirements.
- Future planning policies should acknowledge that within the Bloomsbury Campus Area UCL's cycle strategy, and the extent of cycle parking capacity that has been provided across the campus, will be a material consideration in the determination of planning applications.
- The Plan should include higher requirements for cycle parking on site, and additional contributions for secure street parking for bikes.
- The Plan should promote alternatives to car use such as car clubs electric vehicle charging points

### **How can the Local Plan promote active travel, minimise car use and ensure the sustainable movement of goods and materials in the borough?**

- More point closures (LTNs) so freight by cycle is easier than by van, and taxi/car trips are less convenient.
- Removal of parking and a reduction in the number of permits issued.
- Reduce on and off-street parking.

- The PTAL in NW3 is poor. Without this being fixed, minimising car use is not possible.
- Use S106 to fund public transport improvements.
- Focus on the circular economy- free rides with cargo bikes, free ride sharing bike sharing options and better pedestrian paths.
- Promote sustainable travel and low energy transport.
- Improved joint working/partnerships with neighbouring boroughs is needed.
- Question should be more about how the plan can promote sustainable movement that increases healthiness etc.
- Having only these three promotions (walking, cycling and public transport) seems unlikely to cover all the bases and help allow people to make the right decision for travel/delivery.
- Transport infrastructure should not harm other valued aspects of our townscape – like green open space and heritage assets
- A cheap national and local transport system will enable and incentivise people to get around easily without cars.
- Para 10.19 states “Contributions may also be sought to improve Camden’s bus network where necessary. “change wording to ‘shall’ and ‘greatly’.
- Suggestions for a number of infrastructure projects that the Council should consider pursuing including, step free access to all stations within Kentish Town, rail network improvements and cycle infrastructure improvements.
- Deliveries should be made by small delivery vehicles.
- Deliveries should be carried out during the evening.
- The Council’s recent successful freight consolidation pilot should be promoted within the policy.
- Electric vehicles are increasingly being used to make deliveries.

#### **Other comments received:**

- 15-minute neighbourhoods are supported and the role that transport infrastructure plays in this is key.
- Local Plan should support appropriate higher density development on brownfield sites in and around transport infrastructure.
- HS1 aspires to increase both domestic and international passenger services at St Pancras. Space at St Pancras station is in high demand and platform capacity will become increasingly pressured.
- Potential pressures around St Pancras in terms of developments sites and the proposed Crossrail 2 station entrance.
- HS1 hold several development sites on Pancras Way and Camley Street which may come forward for development within the plan period
- Map 8 in Movement Chapter - include reference to HS1- key regional rail route from Stratford to Ebbsfleet
- Delivery of car-free and low-car development is a key priority.
- Flexibility needs to be built into future policy to enable innovative solutions to be developed in relation to servicing and deliveries.

- Limited access for blue badge parking based on identified demand should be the only exception.

### **Council Response**

- The draft new Local Plan continues to prioritise walking, cycling and public transport as sustainable means of travel.
- The draft new Local Plan has been updated to consider wheeling alongside walking and cycling.
- The draft new Local Plan makes reference to the need for streets to be designed to be attractive and safe; minimise opportunities for crime; and be inclusive and accessible for all, in line with the Healthy Streets approach (see Policy T1). Policy T2 also continues to require developments to contribute to improving the street environment.
- The Plan seeks to secure contributions to a wide range of transport infrastructure including step free access, bus provision, bus shelters, cycle ways, improvements to streets, pedestrianisation schemes, shared transport etc.
- The transport strategy set out in the Plan has been updated to reflect the Council's current transport infrastructure priorities for example the delivery of EV charging points, car clubs, micromobility hubs etc.
- The draft new Local Plan includes a new policy setting out the Council's approach to the delivery of shared transport infrastructure and services in Camden (see Policy T4)
- The draft new Local Plan continues to require new development to be car free to reduce car ownership and use (see Policy T5).
- The draft new Local Plan continues to ensure that cycle parking is provided in line with the standards set out in the London Plan. The London Plan cycle parking policy does not support flexibility unless higher levels of provision are made (see Policy T2).
- The Council favours contributions solely for the bus network as this is likely to provide more localised benefits to the community rather than becoming absorbed into Transport for London's central fund. Planning officers will also be in a stronger position to negotiate contributions to the bus network via S106 agreements as these can be tailored to the development.
- The Plan promotes step-free access to rail and tube stations in Camden and states that the Council will work with organisations seeking to implement such schemes at all Camden stations wherever possible. Where proposals exist to deliver step-free access these have been included in the Plan's Infrastructure Schedule at Appendix 1.
- The Plan has been updated to make reference to the need for developments to contribute towards the delivery of highways greening measures, including tree planting, pocket parks etc. (see Policy T1).
- The Plan sets out our approach to the sustainable movement of goods, services and materials, to help reduce the number of freight trips in Camden, and shift freight trips to cleaner and greener modes of transport (see Policy T6).

- In relation to deliveries, the Plan emphasises that these should be made via sustainable means using cargo bikes or electric vehicles and that deliveries should be made outside peak hours, to reduce congestion (Policy T6).
- The Plan has been updated to make reference to car clubs and states that the Council will work with car club operators to expand and improve the network of car club bays in the borough, including the provision of electric car club vehicles where possible (see Policy T4).
- The Plan has been updated to promote the use of cargo bikes and freight consolidation facilities, as part of our strategy to ensure the sustainable movement of goods, services and materials (see Policy T6).
- The Plan has been updated to align with and reflect the objectives set out in the Council's Transport Strategy (see Policy T1).
- The draft new Local Plan continues to promote development in highly accessible locations in the borough.
- The map in the transport chapter has been updated to refer to HS1.
- The Plan continues to support the provision of parking for disabled residents in new developments.
- Some of the comments made above go beyond what can be achieved by planning, for example the painting of yellow lines, retention of bus services and format of road junctions, and are therefore not covered in the Local Plan.

## **Section 2 - Workshop at Regent High School**

To inform the review of the Camden Local Plan officers held a workshop with students from Regent High School (RHS) on the 12th of June 2023. The workshop was with approximately 30 students: 15 year 10s, and 15 key stage 3 students.

The aim of the workshop was to find out what is important for young people in Camden in relation to their local environment, both now and in the future.

As part of the workshop the students were invited to work together to imagine what Camden will look like in 2033, thinking about housing, jobs, greenspaces, high streets and town centres, transport, buildings, neighbourhood community facilities, health and climate change.

At the end of the workshop the students were encouraged to feedback one key message to the group about how they would like Camden to change in the future.

A summary of the comments made as part of the workshop is set out below.

### **Homes**

The students wanted to live in a home which was well built, comfortable and had some alternative eco-friendly forms of energy. They thought that developments in Camden should use land more intensely and build higher. They wanted their homes to include:

- Lots of greenery and plants
- More rooms
- Space for outdoor activities, shared gardens
- More bins for recycling



### **Jobs**

The students thought that work in the future would be largely the same as it is now. The students were keen to have high paying, interesting, flexible jobs, and work shorter hours. They also wanted jobs that were not too far away from home.

They wanted to travel to work using:

- Active travel modes such as buses, electric cars, walking and cycling
- Air-conditioned buses

### **Neighbourhood**

The students wanted to live in neighbourhoods that were green, with large parks/open spaces and food growing spaces, clean, quiet, and peaceful. Activities that the students wanted to participate in, in their neighbourhoods included:

- Fun fairs, sports, football training, boat clubs, swimming
- Shopping, grocery shopping, cafes and art
- Growing your own food, gardening

### **Environment**

The students thought that we could create more space for nature in Camden by having more green spaces, parks, football pitches, gardens, planting trees, having less built environment, expanding open spaces already in Camden and having a zoo. The students thought we could respond to climate emergency by:

- Having more solar panels, trees and plants
- Reducing CO2 emissions from cars, expanding the ULEZ
- Recycling more

### **Key messages**

Key areas for action identified by the students included -

- Camden needs to be greener, with more trees and open spaces
- Land should be used more intensively, we should aim to build higher
- More sport, recreation and leisure uses are needed
- To improve quality of life, the quality of accommodation needs to improve in Camden

## Section 3 – Consultation on the Draft Site Allocations Local Plan

The Council published the Draft Camden Site Allocations Local Plan for comment between 13 February 2020 and 17 April 2020.

The consultation and engagement was open to local residents, businesses, landowners, workers, community groups and all those with an interest in the site allocations. A range of techniques were used to engage the public, and interested parties, to encourage feedback, including emails, public drop-in sessions, and the use of commonplace, a comprehensive online consultation platform.

The Commonplace website included an umbrella page with a map showing all site allocations and tiles linking to webpages on growth area and individual site allocations. A series of questions were posed for each area and site.

Link: <https://camdensiteallocations.commonplace.is/>

Following the 2020 consultation and engagement exercise, the Council received requests from local residents, community groups and councillors for another opportunity for them to influence the contents of the Plan. To allow interested parties a further opportunity to let us know their views, we hosted a well attended virtual public meeting on the Site Allocations Local Plan and launched two new commonplace consultations - one focused on policies for growth areas and individual sites, and the other focused on climate action in Camden. This period of further consultation and engagement started in November 2021 and ran until 24 January 2022.

During February and March 2022 the Council also undertook some face to face engagement with people living and working in the area. This was done by community researchers in the main growth areas and a separate report sets out the responses we received to this engagement. This can be viewed on our [website](#).

The Site Allocations Local Plan commonplace pages can be viewed at the links below:

Camden Site Allocations – [Commonplace for Growth Areas and individual sites](#)

Camden Site Allocations – [Commonplace for Climate action](#)

This report summarises the responses received from both of these consultation exercises. The report is set out following the same order as the sections in the draft Site Allocations Plan and includes summaries of responses received from both consultation and engagement periods, followed by the Council's response. Given the large number of responses received on the West Hampstead area through commonplace in 2021/22, these are summarised in Appendix 1 at the end of this report.

Since the consultation on the draft Site Allocations Local Plan the Council has taken the decision to progress a review of the 2017 Camden Local Plan. Site allocations are now being incorporated into the draft new Local Plan, rather than being taken forward in a separate allocations plan. The comments made as part of the previous

consultations on the draft Site Allocations Local Plan will be taken into account when updating the site allocation policies for inclusion in the new Local Plan.

## **Summary of Consultation Responses and Council's Response**

### **Section 3: Knowledge Quarter Innovation District**

#### **Policy KQ1 Supporting growth in the Knowledge Quarter Innovation District**

##### **2020 Consultation Responses (Email)**

###### General comments

- Request that the policy criteria be amended from 'must' to 'should' to allow more flexibility.
- There must be flexibility and opportunity for all parties involved to explore different ways for future developments to deliver on the council's high-level priorities and objectives.
- Draft policy addresses the type of economic growth wanted, but largely ignores the social and environmental objectives needed for sustainable growth.
- Policy should make a distinction between the sites in the CAZ and those that are not.
- The quantum and type of development proposed should reflect the strategic location of the site.

###### Policy wording

###### Part a) - collaborative working

- Agree with the need to work collaboratively but further clarity is required as to what this collaboration would entail and how it would be assessed.

###### Part b) – provision of appropriate floorspace

- Agree the type of floorspace being provided does need to appropriately reflect the current and emerging needs of the knowledge economy, but a flexible approach should be applied as it is likely that the need and the requirements for the type of floorspace will change frequently.
- Question how the requirement for provision of evidence to support the type of floorspace required would be monitored going forward to ensure that the floorspace proposed captures the needs and future demand for this floorspace.

###### Part c) - priority growth sectors

- Supportive of aspiration to prioritise the creation of suitable floorspace for priority growth sectors within districts such as life sciences, digital collections and machine learning
- Draft policy seems weighted towards life sciences, data and technology. It is important that the Knowledge Quarter remains balanced for creative spaces between disciplines to flourish.

#### Part d) - mix of spaces

- Request that parts (d) and (f) are merged and reworded to state: “Provide for a suitable mix of workspace types including business accelerators, start-up and move on spaces including affordable workspace as appropriate.”
- Recognise the importance of providing space to suit a mix of occupiers, however the type of workspace will differ from each site and should take account of the specifics of each proposal.

#### Part e) - flexible design for future reconfiguration

- Should include the word ‘new’ i.e., “e) ensure that new buildings are designed to ...”
- Agree with the principle that buildings should be designed to support future reconfiguration for different activities and where possible include flexible floorplates, plant room and mechanical and electrical systems that allow a change from offices to laboratories, ensuring that planning permissions are flexible is critical to the successfulness of these types of uses.

#### Part f) - affordable workspace requirement

- Request specific evidence is provided to justify the requirement of 20% of additional floor space as affordable. The target is not located within the Local Plan (2017). Policy E3 (Affordable Workspace) of the Draft London Plan states that specific affordable workspace policies should be set considering local evidence of need and viability. This has not been provided.
- The supporting text does not set out local evidence of need and viability. This should be included and made available as part of the evidence base
- Any requirement for affordable workspace should be applied flexibly so that it does not disincentivise the delivery of developments in the Knowledge Quarter and compromise Camden’s aim to support the growth of this area as a key knowledge and innovation hub. A flexible approach would also address market cycles and the ability for developments to viably accommodate such floorspace.
- This requirement would conflict with the operational needs of some uses such as the British Library and its operational constraints. Therefore the policy wording should reflect site specific requirements
- Requirement for such a significant quantum of affordable workspace is also likely to compromise the delivery of other planning benefits such as affordable housing, public realm and transport improvements and community benefits, many of which are sought and needed in the Knowledge Quarter area
- Needs to be flexible within any affordable workspace requirement to consider the type of floorspace being created, start-ups in the knowledge and innovation sector

may have a far greater level of occupational requirements than that of traditional office space making them more expensive to deliver

- Requirement to provide affordable workspace must be assessed in the balance and context of an individual site's requirements under specific site allocation policies and other relevant Local Plan policies.
- Policy should be sufficiently flexible to allow more detail to be provided through supplementary planning guidance and respond to the requirements of businesses.
- Welcome the aim to provide at least 20% of the additional employment floorspace as affordable workspace.
- Policy should be clear that the 20% additional employment floorspace as affordable workspace does not apply to additional industrial capacity unless it is demonstrated through this SALP process that such an approach would be viable.

#### Part g) contributing to reducing inequalities

- Requests that Camden define what would be expected to be included in a 'Social Value Framework'.
- Support that development in the area should also provide local benefits, which maximises social value and contributes to reducing inequalities and increasing life chances. This includes new social infrastructure.

#### Part h) provision of new physical and social infrastructure

- The requirement to contribute towards new physical and social infrastructure should be assessed on a site-by-site basis and subject to viability.

#### New homes

- Supporting text relating to new homes should refer directly to Policy H2.
- Want a development that ensures a sufficient number and range of homes provided to meet the needs of present and future generations. Would like new homes that ease overcrowding and homelessness in existing communities as well as supporting the Knowledge Quarter Innovation District.

#### Public realm enhancements

- Want a development that includes open spaces that consider current and future need and support existing and new communities' health and wellbeing.
- Want to see new high quality open spaces and green infrastructure that improve biodiversity and eliminate deprivation, so that every resident is within 280m of green and open space that is accessible 365 days of the year, and that every child can access a local play space.

#### Transportation improvements

- A target to reduce motor traffic should be included.
- Support the need to 'contribute to relevant infrastructure improvements, including to pedestrian and cyclist movement within, around and across the Euston Road corridor'.

- A Healthy Streets scheme is currently progressing for this location, and it will be important that developments in the area contribute if improvements are going to be delivered.
- Wording could potentially be expanded to explicitly cover contributions towards design development as well as implementation, and for developers to actively consider ways they could limit their impact on Euston Road, e.g. through innovative servicing strategies which make use of consolidation centres or out of hours deliveries etc.

#### Supporting text

- Request the following is added to the final sentence of paragraph 3.10: “This policy seeks to reinforce this point and ensure that all major proposals for employment, research and/or learning development within the innovation district contribute towards the provision of new homes. Whilst balancing competing land use needs, other priorities and relevant policy criteria.”
- Want development that contributes to protecting and enhancing our natural, built and historic environment.
- Development should minimise waste and pollution and mitigate and adapt to climate change. We expect development in this area to be zero carbon or, preferably, carbon positive.

### **2020 Consultation Responses (Commonplace)**

#### What development priorities do you think a policy for this area should focus on?

2 people representing Arlington Road Residents Association responded to this question supporting the following points:

- Improving how people move around the area, Environmental Improvements (2 responses)
- The general look and feel of the place

#### What changes do you think need to be made to make the policy more effective?

2 people representing Arlington Road Residents Association responded to this question

- To not focus on only one group of uses (laboratories)
- Fund pre school and primary schooling in the area to help ensure no one gets left behind
- Help residents get better / higher qualifications so they can join the Knowledge Quarter workforce as participants not just less well qualified service positions
- Reduce the area. Mornington Crescent should not be included. It is too wide for it to be meaningful
- Camden Town should not be designated within this policy

#### Infrastructure priorities

- Education, walking and cycling, health and wellbeing, open space and facilities for the young and elderly were identified as being important

## 2021/ 22 Consultation Responses (Email)

### Area boundary

- Object strongly to the proposals for the extension of the extent of the Knowledge Quarter.
- Need to recognise our local sense of place and heritage assets
- Agree with the criticism that the proposed area is too large: it should not include the areas to the north of Mornington Crescent or indeed of Amptill Square.
- Note that the map does not show the Euston Area redevelopment site which occupies a large area: this omission gives a misleading impression of development sites within the proposed Knowledge Quarter, revised Knowledge Quarter should not extend to the west of the Hampstead Road, again to protect local communities, housing, green open space, and heritage assets.
- Extension of the area as proposed also has other disadvantages and is in danger of becoming a diffuse and meaningless brand rather than a helpful guide to development.

### Policy approach

- A key characteristic of the Knowledge Quarter is that it is home to many institutions and headquarter buildings and this needs to be considered as it is often not possible to accommodate affordable workspace in a headquarter building where it is being designed for one tenant, particularly a headquarter building which will also have extensive laboratory and research facilities.
- Requirement for such a significant quantum of affordable workspace is also likely to compromise the delivery of other planning benefits such as affordable housing, public realm and transport improvements, and community benefits, many of which are sought and needed in the Knowledge Quarter area. A flexible approach is required, and the viability of each individual scheme needs to be considered and a balance made as to what is appropriate in each case.
- Request that Camden define what would be expected by 'Social Value Frameworks' and would welcome the opportunity to work with Camden to further develop the thinking around this. (Access Self-Storage , Global Holdings Management Group, SMBL)
- Reiterate that parts (d) and (f) are merged and reworded to state: "Provide for a suitable mix of workspace types including business incubators, accelerators, and grow on spaces including affordable workspace, where appropriate" to avoid disincentivising developers from optimising sites in the KQ.
- Following the adoption of the new London Plan we consider that, as a geographically focused key economic centre within the CAZ, the Knowledge Quarter Innovation District should be identified as a location that may be suitable for tall buildings. Paragraph 3.9.3 of the London Plan makes clear that in large areas of extensive change [such as the KQID] the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context.
- Query how the 20% affordable workspace policy expressed in KQ1 (Part F) has been formulated. The target is not currently included in the adopted Camden

Local Plan, and it is unclear how this relates to the evidence base documents published thus far.

- Recognise that large development proposals like that coming forward at Euston will have their own specific viability considerations. We would also suggest that the policy include suitable wording that clarifies that the amount of affordable workspace on individual schemes should be determined by reference to scheme viability.
- Location within the Knowledge Quarter has been used as a factor in justifying consents for significantly harmful planning applications, harming highly valued heritage assets and against the needs and concerns of local people.

## **2021/22 Consultation Responses (Commonplace)**

### What development priorities are the most important in terms of the area policy?

8 people responded to this question:

- Improvements to walking and cycling routes was the highest priority
- Access to jobs for local people and improvements to open space were then next highest.
- Access to education was important

### What specific points do you think should be included in the policy?

8 people responded to this question raising the following points:

- Promoting affordable housing for health and social care workers should be a priority
- Should support housing for teacher assistants also
- Respect the existing historic built environment (2 responses)
- Support building reuse and repurposing over rebuild
- Climate change considerations must be a priority, specifically use of non-carbon sources for heating and cooling. Solar panels should be considered
- Adequate housing for key workers and their families
- Cycling and walking routes
- Commercial floorspace should not be prioritised in Camden Town.
- Provision of gyms, cafes and roof terraces should not be allowed to be used as a means of not providing meaningful public amenities
- Should only provide affordable homes not luxury homes
- Recognition of the existing residential communities in the area and not detrimentally impacting them
- Accessibility – be community focussed
- Incorporate truly active travel
- Increase primary care offer to meet additional demand
- Integrate schools into the residential provision to allow people to walk to school
- Well designed buildings that don't block natural light or increase traffic

### Is there any need for new or improved infrastructure to support additional growth?

5 people responded to this question and raised the following points:



- Better cycle and walking routes ( 4 responses)
- Active travel capacity and priority
- Severe regulation and enforcement of vehicle movements to protect pedestrians
- Improvements to the canal path

#### Any other comments?

5 people responded to this

- There is no evidence of planning for 15 minute neighbourhoods
- Boundary should not include Camden Town, or roads to the west of the Camley Street / St Pancras Way boundary or to the north of southern boundary of Oakley Square
- Policy looks positive albeit there should always be a use mix to ensure a coherent narrative, not isolated discrete areas.
- More emphasis is needed for the provision of new Primary Health Care if the population is to grow

#### **Council Response**

- As the content of the Draft Site Allocations Local Plan is now incorporated into the draft new Local Plan, the matters included in Policy KQ1 are now covered by Policy S1 - South Camden and other relevant Local Plan policies, with no separate Knowledge Quarter area policy or boundary included in the Plan.
- Policy S1 states that the Central Activities Zone (CAZ) and Knowledge Quarter centred on King's Cross and Euston will continue to be the main focus for employment development in Camden. It also states that the Council will support the Knowledge Quarter (KQ) to thrive as a hub of innovation and knowledge-intensive industries in line with the KQ2050 Strategy, and ensure that its growth and development are inclusive, sustainable, and community-focused. To ensure the sustainable growth and success of the KQ, major proposals for additional employment, research and/or learning floorspace within this area will be required to contribute to reducing inequalities and increasing life chances in local residential communities by maximising community benefit at the planning, construction and end user phases, including supporting increased access to jobs, skills training and educational opportunities.
- Knowledge and research based uses are referred to in relevant site allocation policies.
- Material relevant to comments received on SALP Policy KQ1 is also included in draft new Local Plan Policy IE1, which sets out the approach to delivering a sustainable and inclusive economy. This seeks to:
  - support businesses and enterprises of all types and sizes for a variety of business activities;
  - prioritise the delivery of space for key growth sectors, research based activities and start ups, smaller businesses and social enterprises;
  - require larger schemes to provide a range of unit sizes to increase the supply of space available for smaller businesses and entrepreneurs;

- encourage the provision of premises and sites that meet the specialist requirements of sectors including creative industries, life sciences and jewellery-related uses in Hatton Garden;
  - support local business start-ups, entrepreneurs and residents seeking work to access jobs, skills, education and training opportunities by maximising benefits during the planning, construction and end user phases; and
  - apply our design policies to ensure that new workspace is well laid out, functions well for its intended users and can adapt to changing working practices.
- The approach to affordable workspace is set out in Policy IE4 of the draft new Local Plan. This, and other policies, have been subject to viability testing as part of the Viability Appraisal of the Plan. Evidence that informed the draft new Local Plan's approach to affordable workspace will be made available when the Plan is published for consultation.
  - Any flexibility in the policy wording is introduced through specific criteria and therefore it is not considered necessary or appropriate to remove the word 'must' from the start of the policy wording.
  - Like Site Allocations Local Plan policy KQ1, draft new Local Plan Policy S1 states that major proposals for additional employment, research and/or learning floorspace within the Knowledge Quarter area will be required to contribute to reducing inequalities and increasing life chances in local residential communities; however S1 does not specifically refer to a 'social value framework'.
  - Many of the matters referred to in comments relating to Policy KQ1 are now covered in topic-based policies in the draft new Local Plan, including the delivery of new homes, transport, tall buildings, climate change, improving health and well-being, social and community infrastructure, achieving design excellence, biodiversity and open space provision.

## **Section 4: Bloomsbury Campus Area**

### **Policy BC1 – Bloomsbury Campus Area**

#### **2020 Consultation Responses (Email)**

- The majority of UCL's buildings are in the Bloomsbury Campus Area. We support the Policy BC1 ambition for growth, the policy's objectives and priorities, and the approach to student housing set out in paragraphs 4.13 and 4.14. However, UCL also wishes to ensure that University facilities outside the Campus Area boundary are able to expand, and requests that either the boundary is extended to include them, or text is included in this part of the plan to indicate that University development will be supported outside the boundary.
- This is one of London's most architecturally and historically significant areas, with high quality Georgian architecture, residential terraces and squares (notably Gordon Square), which contribute strongly to the character of Bloomsbury Conservation Area. University expansion often seriously harms heritage, and new facilities should be designed to enhance the area, rather than their education/

research benefits being weighed against heritage harm. Consequently, Policy BC1 should require new development to be of exceptional architectural quality, and be respectful of, and entirely subservient to, the immediate historic environment. In addition development should be required to mirror the immediate historic environment in relation to scale and massing, solid-to-void ratio and the use of external materials.

- Proper implementation of Policy BC1 clause (f) is critical to enhancing the special character of the Conservation Area as an internationally significant example of town planning. Woburn and Torrington Squares could be outstanding, but are diminished by piecemeal and inappropriate development, temporary barriers, car parking, concrete blocks and litter. The plan should encourage closure of the southern end of Woburn Square by development that directly reflects the Georgian terraces forming the eastern and western ranges. For Torrington Square the plan should encourage: restoration of the Georgian Square with a garden and appropriate railings and entrances; transformation of the streets into public spaces reflecting the treatment of Byng Place; development on the eastern range which continues the treatment of the Georgian terraces; a uniform and appropriate treatment of the western facade; closure of the southern end; and retention of the open northern end and the important view of Byng Place and the Grade II Church of Christ the King.
- Improvements to the public realm should address car parking, bicycle parking and security, and fly-posting. The plan should encourage development that provides underground or otherwise hidden car parking facilities, and secure cycle parking that is hidden from the public realm. To combat fly-posting, wherever possible, street furniture should be removed, street-lighting should be attached to walls instead of columns, unavoidable street furniture should be of high architectural quality and appropriate to the environment, and the University should manage advertising columns for commercial and political purposes. Further information is available in the Advisory Committee's report "Street Cleanliness in Bloomsbury: Advice for its Improvement".
- We support the strong emphasis on improving walking and cycling connections and open space. There may be merit in expanding the 'sustainable growth' priority to limit the impact of servicing through collaborative and innovative approaches, especially where a single landowner such as UCL controls many of the major buildings. Measures should also be included to support any traffic reduction in Euston Road arising from Policy KQ1(h). We support the proposed improvement to east-west walking-cycling links to integrate with the West End Project, but suggest there may also be merit in improving north-south links taking in the anticipated pedestrianisation of the northern end of Gordon Street, and connecting across Euston Road and into Euston Station.
- We support the development of student housing providing for the University, but this will increase healthcare demands. Investment in primary health is needed, and replacement premises may also be needed, but opportunities are limited and rents are very high.
- The plan should include a target to reduce motor traffic throughout the area, and not just in the part covered by the West End Project.

- The policy should be made easier for citizens and developers to understand. The area is already very walkable and has a great feel with lots of open space, but would benefit from more independent cafes and affordable food.

### **2021/ 22 Consultation Responses (Email)**

- As indicated in our 2020 response, we are generally supportive of Policy BC1, but are concerned to protect our ability to expand the capacity of the properties we hold outside the Campus Area, and request that either the boundary is extended to include them, or text is included in this part of the plan to indicate that University development will be supported outside the boundary.
- We propose that paragraph 4.5 be revised to read: "Given the importance of the University and the higher education sector to the Camden economy, a key objective of Policy BC1 is for the Campus Area to maintain its higher education role. The Council aims to facilitate additional provision in the Campus Area, whilst recognising that there are many higher education institutions and facilities in other parts of Camden, and acknowledging that all the needs of the sector cannot be met within the Campus Area. Consequently, the Council will also support development to meet higher education needs elsewhere in the Knowledge Quarter and in other parts of the borough, subject to compliance with relevant development plan policies and any other relevant material considerations."
- The policy should encourage the provision of multipurpose facilities that can be shared between various organisations and the community. More use should also be made of the Malet Street highway for staging inclusive event. The plan should seek restoration of Torrington Square Gardens with reinstatement of grass in place of gravel and the introduction of ornamental trees and shrubs on the west side.
- The [proposed] building at 20 Russell Square should be compatible with the existing Georgian terrace (allocation BC2c). The site is currently being colonised by the Ecole Francais.
- The existing squares, Victorian buildings and green spaces should be protected, with improvements and additions to the green routes and open spaces. The policy should aim for an area which is affordable and safe, and buildings that do not look like they should be in Vegas, KL or Dubai.

### **Council Response**

- The Council's approach to this area now is set out in draft new Local Plan Policy S3 - Bloomsbury Campus Area.
- The objectives of the policy text have been amended to acknowledge there are many higher education institutions and facilities in other parts of Camden and that these will be supported subject to compliance with relevant development plan policies.
- Additional text has been included relating to the priority to be given to the historic and architectural character of the Campus Area, given its location within the Bloomsbury Conservation Area / listed buildings, and to factors that should be taken into account in this area, alongside the design and heritage requirements set out in other Local Plan policies.

- The policy has been amended to reference the poor quality of the Woburn Square margins and measures that would enhance the open spaces.
- Land to the east, south and west of the Torrington and Woburn Squares is controlled by the University of London. The University is not currently promoting development of this land, therefore it can not be included as an allocation, which must be available for development within the plan period.
- Additional text has been included to encourage the removal of intrusive car parking, and unnecessary street furniture, rationalising short stay cycle parking and providing long term cycle parking that minimises its impact.
- The policy has been amended to strengthen the emphasis on reducing the impact of motor vehicle traffic and parking within and across the whole area.
- The draft new Local Plan also includes policies on achieving design excellence, open space provision, biodiversity, climate change, improving health and well-being, social and community infrastructure, delivery of new homes, and transport, which apply to this site and the whole borough and which address many of the wider comments made on this policy.

## **Policy BC2 - Development sites in the Bloomsbury Campus Area**

No responses were received.

## **Section 5: Camden Goods Yard Area**

### **Policy CGY1 – Camden Goods Yard Area**

#### **2020 Consultation Responses (Email)**

- Welcome the broadly positive and strategic nature of the policies; however, the development plan should support the optimum regeneration potential of the sites within the area – sufficient flexibility should be provided.
- Agree it is important to engage with adjacent landowners to co-ordinate and optimise development proposals, however, requirements to co-ordinate should not impede delivery of individual plots which may come forward for development at different timescales while being designed holistically.
- The opportunity for taller buildings has been established by the extant planning permission. The policy should be clearer that taller buildings are appropriate subject to design and impact assessment.
- There is little reference or consideration of potential archaeological issues. Camden Goods Yard is in a 'Tier 2 Archaeological Priority Area'. Applications requiring groundworks should be accompanied by an archaeological desk-based assessment. Remains associated with the stables should be protected.
- Generally supportive and believe the Plan will have an important role to play in providing site-specific guidance for Camden Goods Yard.

## Housing

- It should be possible to discharge the requirements of Camden Local Plan Policy H2 on 'mixed-use development' taking a strategic view of land uses across the Camden Goods Yard area. There should be flexibility to promote commercial-only and residential-only schemes on specific sites and in the context of objectives for the area. Therefore, SALP should acknowledge that a mixed-use requirement for individual sites is not necessary and can be addressed across the area as a whole.
- The MHCLG Housing Delivery Test found that only 87% of Camden's requirement had been met. Greater support should be given to providing housing to deliver regeneration and planning benefits.
- We are looking to provide an extra-care facility but delivery would be contingent on affordable housing/S106 requirements being adjusted.
- Consider that the approach to estimate housing capacity is sound – however, figures shown in the Plan should be treated as indicative and not used prescriptively.

## Transport and infrastructure

- Development should assess the impact on nearby London Underground stations – Chalk Farm and Camden Town.
- Support measures to improve walking and cycling, however, these should not have a significant impact on bus journey times or reliability.
- Provision of identified routes/infrastructure – needs to be clear where this is beyond a single developer's ability to deliver.
- Support clause i. of the policy identifying the need for social infrastructure to support the new resident and working population. Welcome the opportunity to discuss options for a potential healthcare facility in the area, particularly should an alternative proposal come forward on the Morrison supermarket site.
- Support objectives of addressing permeability and safety issues but wish to raise various omissions and inconsistencies – amendments to text proposed.
- Flexibility with regards to the appropriate technology for minimising carbon emissions should be allowed to achieve the best outcome – alternatives to an area-wide district heating and cooling system exist.
- Preliminary studies indicate it is not possible to connect Camden Goods Yard to existing district-wide systems due to constraints and distances. Air source heat pumps will potentially be more efficient in carbon terms.
- The Plan should not duplicate but instead signpost policy requirements relating to climate change and energy which are addressed by the London Plan.
- Juniper Crescent/Gilbeys Yard should provide a new GP surgery and community space.

## **2021/ 22 Consultation Responses (Email)**

- This part of Camden is very harsh and there is not very much common outdoor space. Given there will be so much new housing, this aspect is very important for the building of community.

- A variety of uses, densities and forms (flats, maisonettes, houses) makes for a more coherent whole.
- Welcome the generally positive and strategic nature of the proposed policies.
- In line with London Plan D9, the Plan should identify the Camden Goods Yard area - including Morrisons and Chalk Farm Road sites - as a suitable location for tall buildings.

#### Taller buildings/massing

- This area can tolerate some new blocks of flats, but not too many and not too high, or the area will be ruined
- Development should not be too tall directly on the high street but can be taller along the tracks as views will not be blocked.
- Keep tall buildings in the King's Cross area where there is industry, transport and office spaces.
- Can probably accommodate existing heights plus 1-2 storeys. Ground scrapers and not skyscrapers will be key to ensuring development knits with the historic context.
- Massing should be appropriate to the local area and historical context.

#### Transport and infrastructure

- Promote active transport, avoid car-led strategies. Encourage communities through development mix. Provide more than housing – social infrastructure will be key. What will be provided in terms of primary care facilities, day nurseries, elderly care and retail/leisure offer?
- Ensure sufficient parking for disabled drivers.
- Plan should make clear there is a requirement to both safeguard and deliver the necessary bus infrastructure (stops and stands) needed to successfully operate the bus network in this area and agreement needs to be reached with TfL.
- Contributions may be needed as appropriate to support the delivery of any changes to the bus network or associated infrastructure.
- Achieving net zero emissions must be subject to feasibility and viability.
- Delivering low carbon development is not solely dependent on an area wide district heating and cooling system.

#### **Council Response**

- The proposed draft new Local Plan does not include an allocation for the Camden Goods Yard Area in the form included in the Site Allocations Local Plan. The Council's approach to this area now is set out in Policy C1 - Central Camden and individual site allocations.
- Individual allocations identify where tall buildings may be an appropriate form of development in accordance the findings of the Camden Building Height Study
- The Archaeological Priority Area has been referenced and need for archaeological assessments has been identified in the relevant allocations
- The housing capacities in individual allocations are indicative and new draft Local Plan housing policies will be applied to all applications / sites.

- The new draft Local Plan policy T3 sets out the Council's approach to public transport, and infrastructure requirements for Central Camden, including references to Underground station improvements, are set out in Policy C1. Individual allocations set out site-specific walking, cycling, bus improvements and public realm requirements.
- Social infrastructure requirements, where known, are identified in individual allocations
- The draft new Local Plan's approach to zero carbon development is set out in Chapter 8 - Responding to Climate Change, and this applies to all development proposals.
- The draft new Local Plan expects development of sites within the area to improve the local environment including providing substantial new, welcoming and safe open space and public areas and improving connections.

## **Policy CGY2 – Morrisons supermarket**

### **2020 Consultation Responses (Email)**

- The provision of a minimum of 500 homes does not reflect or support aspirations to optimise housing delivery. Should have 573 homes as a minimum and seek further optimisation to deliver additional homes where this can be demonstrated as appropriate in planning terms.
- Support regeneration of the Winding Vaults, however their re-opening should be consistent with preservation of the historic fabric and integrity of the canal side structures.
- The use of the linear routes by cyclists is not explicitly acknowledged.
- Agree that motorised traffic should only approach from Chalk Farm Road. Agree that buses are too intrusive and occupy too much space. Agree that taxi pick up needs to be managed appropriately.
- Support proposals to improve Juniper Crescent/ Chalk Farm Road junction.
- Support accessibility as an objective but want to understand what any new links from the canal to the development site might mean and how this would affect the canal's historic character and flow of people along the towpath.
- Support investigating the feasibility of re-locating bus services. Engagement with residents of Juniper Crescent indicates long-standing amenity issues associated with the proximity of bus stops to people's homes and it is important for this to be reviewed.
- Policy could identify more innovative ways to manage deliveries and servicing for the supermarket.
- Buses form an important part of public transport and their continued provision should be seen as integral to redevelopment of the site. While TfL is open to discussions about relocation of bus services, we wish to avoid disproportionate impacts on users. TfL would object to relocation/removal of bus stands without a suitable alternative location being agreed.



- The scale of development is likely to require upgrades to the water supply network. Developers should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The indicative housing capacity has been increased to 644 which reflects the planning permission granted for this site.
- The importance of the 'winding vaults' is recognised in the allocation.
- The allocation references the priority for both pedestrians and cyclists on all routes.
- There is a requirement to ensure that the impacts of bus movements are minimised whilst ensuring accessibility to bus services is maintained.
- The new draft Local Plan policy T6, which will apply to this and other sites, covers managing deliveries and servicing.
- Comments regarding water infrastructure requirements are noted.

## **Policy CGY3 – Morrisons Petrol Filling Station**

### **2020 Consultation Responses (Email)**

- Support a new cycling link to Chalk Farm Road.
- The wording about whether the loss of the petrol station is acceptable is ambiguous – should state that it is not necessary for the petrol station to be re-provided and there is justification for removal in line with Camden's movement hierarchy.

### **2021/ 22 Consultation Responses (Email)**

- Request further flexibility around mixed-use development for the two sites fronting Chalk Farm Road – former petrol filling station and 100 Chalk Farm Road. These sites should be for commercial floorspace with the main Morrisons site delivering as many homes as possible.
- Incorporating housing into a commercial scheme would compromise the quality, quantum and let ability of the employment floorspace.
- Chalk Farm Road is likely to deliver poor residential amenity due to the busy road, proximity to a railway freight line and proximity to The Roundhouse.
- The Council should make clear there is no policy protection against removal of the petrol filling station.

### **Council Response**

- The allocation has been updated to reference the planning permission and reproviding the Petrol Station on site has been removed from the allocation.
- The allocation recognises the importance of improving pedestrian and cycle access into the wider area.
- The allocated uses have been amended to include self contained residential use to allow for a mixed use development. The relationship with the main Morrisons site is also recognised.
- Housing is the priority use of the Local Plan and should be incorporated where feasible without compromising other uses to help meet the borough's housing need.
- Amenity matters are covered in draft new Local Plan Policy A1 - Protecting Amenity.

## **Policy CGY4 – 100 Chalk Farm Road**

### **2020 Consultation Responses (Email)**

- Support a new cycling link to Chalk Farm Road.
- The policy should be explicit about this site coming forward as a demolish and redevelopment scheme to optimise its potential.
- The ability to achieve the aspirations for active frontages is dependent on a pragmatic approach to alterations to the existing frontage wall. Positive references to permeability and opening up of the wall should be included in line with what has been established in past planning permissions.
- Welcome the identification of improving the setting of the Roundhouse but consider this should be in the main policy text to ensure its achievement.

### **2021/ 22 Consultation Responses (Email)**

- Request further flexibility around mixed-use development for the two sites fronting Chalk Farm Road – former petrol filling station and 100 Chalk Farm Road. These sites should be for commercial floorspace with the main Morrisons site delivering as many homes as possible.
- Incorporating housing into a commercial scheme would compromise the quality, quantum and let ability of the employment floorspace.
- Chalk Farm Road is likely to deliver poor residential amenity due to the busy road, proximity to a railway freight line and proximity to The Roundhouse.

### **Council Response**

- Any planning application on this site would need to be assessed against draft Local Plan Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Building. This expects assessment of refurbishment and retention options before demolition is considered.
- The allocated uses have been amended to include additional uses, including self contained residential and student accommodation.

- The Council considers that this site could potentially deliver both commercial and residential development to help meet the borough's housing need subject to careful design and ensuring adjacent uses are not detrimentally affected.
- The allocation has been amended to strengthen and clarify the expectations relating to enhancing the listed Roundhouse.
- The wall is a listed structure, therefore any alterations to it would need to be carefully considered in terms of its heritage impact.
- The allocation recognises the relationship between the adjacent sites.

## **Policy CGY5 – Juniper Crescent**

### **2020 Consultation Responses (Email)**

- Redevelopment of the estate needs to be justified.
- The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.
- The ballot is not a planning matter and therefore should not be referenced in the body of this policy.
- Criterion (b) should refer to 'floorspace' rather than accommodation.
- Types of replacement dwelling should not be prescribed by the policy. Needs should be assessed when a planning application is submitted in line with Policy H7 of the Camden Local Plan.
- Make clear that the 50% is a target and subject to viability and other considerations.

### Transport and infrastructure

- A new through/over rail route to Chalk Farm Road for walking and cycling is likely to be almost impossible to achieve due to technical and land ownership constraints.
- Use of the spinal route does not acknowledge use by cyclists.
- Buses form an important part of public transport and their continued provision should be seen as integral to redevelopment of the site. While TfL is open to discussions about relocation of bus services, we wish to avoid disproportionate impacts on users – TfL would object to relocation/removal of bus stands without a suitable alternative location being agreed.
- Support investigating the feasibility of re-locating bus services. Engagement with residents of Juniper Crescent indicates long-standing amenity issues associated with the proximity of bus stops to people's homes and it is important for this to be reviewed.
- The scale of development is likely to require upgrades to the water supply network. Developers should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The Council support a housing led-development of this estate given the potential wider regeneration benefits to the area and its potential contribution to the borough's housing need.
- Reference to the Mayor's Good Practice Guide to Estate Regeneration has been included.
- A successful ballot of residents has now been undertaken, which establishes the principle of redevelopment.
- The policy criteria relating to socially rented accommodation has been amended to refer to socially rented floorspace.
- Reference to the type of replacement dwellings is not included in the allocation in the draft new Local Plan and will be assessed against relevant Plan policies.
- The allocation does not refer to the 50% target figure. This will be assessed at planning application in accordance with relevant Local Plan policies.
- Delivery of a spinal route for pedestrians and cyclists to connect Oval Road/Regent's Canal, via Gilbeys Yard, with Juniper Crescent and onwards to Regent's Park Road and Primrose Hill is an objective of the adopted Planning Framework.
- The allocation has been amended to ensure that the location of bus stops and stands minimises impact on residential amenity and quality of place whilst optimising their location.
- Reference to liaising with Thames Water has been added to the allocation.

## **Policy CGY6 – Network Rail site at Juniper Crescent**

### **2020 Consultation Responses (Email)**

- Support a link with Regent's Park Road but use by cyclists should be acknowledged.
- The Mayor would welcome the provision of industrial capacity on this site which could contribute to addressing the industrial demand in Camden.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The allocation has been amended to include reference to cyclists.
- Light industrial is included as one of the allocated uses. The precise nature of the development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.

## **Policy CGY7 – Gilbey’s Yard**

### **2020 Consultation Responses (Email)**

- The high retaining wall at the back of the towpath is a significant historic feature in its own right.
- The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor’s Good Practice Guide to Estate Regeneration.
- The ballot is not a planning matter and therefore should not be referenced in the body of this policy.
- Criterion (b) should refer to ‘floorspace’ rather than accommodation.
- Types of replacement dwelling should not be prescribed by the policy. Needs should be assessed when a planning application is submitted in line with Policy H7 of the Camden Local Plan.
- Make clear that the 50% is a target and subject to viability and other considerations.
- The scale of development is likely to require upgrades to the water supply network. Developers should liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The allocation refers to preserving, repairing and enhancing heritage features of the canalside.
- Reference to the Mayor’s Good Practice Guide to Estate Regeneration has been included.
- The ballot is referred to in the background information rather than the policy criteria.
- The policy criteria relating to socially rented accommodation has been amended to refer to socially rented floorspace.
- Reference to the type of replacement dwellings is not included in the allocation in the draft new Local Plan and will be assessed against relevant Plan policies.
- The allocation does not refer to the 50% target figure. This will be assessed at planning application in accordance with relevant Local Plan policies.
- Reference to liaising with Thames Water has been added to the allocation.

## **Policy CGY8 – Camden Lock Market and the Interchange**

### **2020 Consultation Responses (Email)**

- Concerned about reference to intensify the market as it is overcrowded already.

- The high retaining wall at the back of the towpath is a significant historic feature in its own right.
- Protection of the Camden Waterbus mooring should be sought.
- Repairs to the existing towpath bridge over the entrance to Dead Dog Basin are required. A contribution would be beneficial to support increased use.
- The policy should refer to planning permission 2015/4774/P: it was agreed as part of the planning permission that residential use on the site is not appropriate, therefore the indicative capacity would be zero. It was also agreed that 30 homes at Hawley Wharf would be provided in lieu of provision.
- Labtech is willing to work with Berkeley Homes (St George) to provide better access between The Interchange and Camden Lock Place. As Labtech own both properties, there is no need to require co-design between adjoining landowners.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

This site is not included as an allocation in the draft new Local Plan. Planning permission has been granted for the site and it will not provide any on-site housing.

## **Section 6: Camley Street and St Pancras Way Area**

### **Policy CSP1 - Camley Street and St Pancras Way Area**

#### **2020 Consultation Responses (Email)**

##### Proposed uses

- Support strengthening the area's role as an employment location and delivering a significant increase in the number, mix and affordability of homes.
- Due to the proximity to King's Cross and Camden Town, this site offers real opportunity for offices and the policy should reference this.
- Part E of this policy that requires 50% of additional floorspace is permanent self-contained homes should be removed – there is no planning policy basis for applying the 50% requirement of the Local Plan's mixed-use policy to the Camley Street and St Pancras Way area. Para. 3.10 of the SALP states that areas outside of the Central London area or designated Camden Town town centre will not be subject to a set target – consequently the SALP is inconsistent in this regard. Each site should be determined taking account of the indicative housing capacity and site-specific considerations.
- Policy should focus on the general look and feel of the place. Make clear that growth must be inclusive and that the current food service businesses will not be forgotten. (Resident)
- Create a place where existing and new businesses can sit alongside each other successfully.

- Plans should enable the retention/inclusion of existing businesses. (Resident)
- Ensure that affordable housing is maximised.
- The Council should firstly demonstrate that the industrial capacity can be re-provided especially storage, servicing and logistics functions that service the CAZ. Camden should consider designating the industrial area as Locally Significant Industrial Site as its quantum and function is locally significant to Camden and the CAZ. Transport improvements should ensure that the area's industrial functions can still operate effectively. Where industrial capacity is lost, the affordable housing threshold is 50%.
- The CCG welcomes the statement in paragraph 6.38 that the plans for St Pancras Hospital are not developed in isolation but in a comprehensive and coordinated way. However, there are no references to the need for social infrastructure.
- Focus on the priorities listed in the Neighbourhood Plan.
- Any development should be designed so it does not adversely impact on the railway. New residential or office development should be designed to mitigate impact and noise from the railway.
- University College London has ambitions to increase its presence in the area to deliver new research and academic space. UCL requests that the text refers to the contributions the education sector can make to the area.
- Support the SALP's vision and intentions. It has always been the Forum's intention to preserve light industrial and other productive activity in new and environmentally transformed accommodation, to continue to serve the needs of Central London's economy, especially but not exclusively the food sector. Support increasing the provision of affordable housing, mainly for social rent. Head leaseholders should form a part of collaborative discussions involving Camley Street's sites.

#### Height and density

- Given the heritage value of the King's Cross area building taller than those under construction at King's Cross should be resisted.
- The number of homes proposed for the area is far too many for a low-rise, low-density environment where the quality of our heritage is important. It will overload the facilities and result in a "rabbit-warren" feel to Camden, which is not in keeping with what local people want.
- This is an area that needs to be protected, not over-developed by cramming more buildings onto the sites.

#### Co-ordination of proposals

- Support reference to co-ordinating development across the whole of the St Pancras Hospital site.

#### Delivery of infrastructure

- Support, especially parts c and f.
- Do not support proposals for a new pedestrian bridge between 103 and 101 Camley Street. A crossing further west is preferred

- Camden Town Unlimited have produced a proposal for the section of canal between King's Cross and Camden Town – funding will be needed to support this work.
- Provide a new park or communal swimming pool.
- Infrastructure priorities are linkages with neighbouring areas, links to the concrete works to the east and links to the Highline.
- Improve transport infrastructure used by existing businesses. Moving them off-site will greatly increase road miles travelled.

## **2021/ 22 Consultation Responses (Email)**

- In Camley Street, there are 350 mainly food-based manual labour jobs – no mention is made about this in the SALP. The food supply chain is the largest employer in Camden. (
- All areas should be developed with sustainability as the central focus. Camden's plans use 'Net Present Value' to determine best value which is totally unsuitable as it devalues long-term sustainable outcomes.
- Camley Street sites against the railway line are suitable for tall buildings.

## **Council Response**

- The proposed draft new Local Plan does not include an allocation for the Camley Street Area in the form included in the Site Allocations Local Plan. The Council's approach to this area now is set out in Policy S1 – South Camden and individual site allocations. The proposed uses for the area are set out in Policy S1 and the individual allocations.
- The site allocations for the Camley Steet area seek to intensify employment provision whilst allowing for the introduction of residential uses to help meet the borough's housing need.
- Policy S1 and individual allocations seek to reprovide and increase the amount of employment floorspace across this area, including the appropriate reprovion of industrial, storage or distribution floorspace that supports the existing businesses and jobs, the functioning of the CAZ and local economy, as part of mixed-use intensification proposals.
- The Camley Street Neighbourhood Plan forms part of the statutory development plan for the area and it will be used alongside the Council's Local Plan in the assessment of any planning applications.
- Self contained housing the priority use of the Local Plan including affordable housing and will be delivered in accordance with the housing policies of the draft Local Plan
- Site allocations seek to intensify existing employment use as part of mixed use redevelopment schemes. It is not considered necessary or appropriate to designate the area as a Locally Significant Industrial Site.
- Individual allocations identify sites suitable for health and research and academic space as appropriate. Draft Local Plan policy SC1 and policies on the Inclusive Economy support the provision of these uses.



- Sites considered by the Camden Building Height Study as locations where tall buildings may be an appropriate form of development and potentially appropriate height ranges are identified in the draft Local Plan.
- Indicative site capacities are set out in individual site allocations. These based on urban design assessments that take into account site-specific context and constraints.
- Draft new Local Plan policy 1 - South Camden includes a reference to the creation of a potential new canal crossing to improve connectivity between Kings Cross, Camley Street and St Pancras Way as a key infrastructure priority for the area.

## **Policy CSP2 - 120-136 Camley Street**

### **2020 Consultation Responses (Email)**

#### Mix of land uses

- The SALP should be clear that the industrial capacity should be reprovided unless it is consolidated on another site through a masterplan. Where industrial capacity is lost, the affordable housing threshold is 50%.
- The quantum of office space should be specified to ensure it does not undermine the consolidation of space in the Central Activities Zone or town centres.
- Include an office element within this site.
- Ensure compliance with Neighbourhood Plan – retention of existing businesses and provision of affordable housing.

#### Height and density

- Do not develop high rise towers in this location.

#### Delivery of infrastructure

- Improvement of the bridge underpass is critical – wording should be strengthened in criterion c.
- The scale of development in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development site.
- Make reference to a cycle as well as a pedestrian route linking with Maiden Lane estate.

#### Other

- An option would be to build over the railway tracks between the site and Maiden Lane estate to deliver additional homes – this should be taken into account when planning this site.
- Build a platform over the railway – this will significantly increase housing capacity.
- The route to the Maiden Lane estate should also reference cycles.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- Welcome the references to facilitating access to the Camden High Line.
- The allocation in the draft new Local Plan specifies that development must intensify the employment floorspace on site, with no net loss.
- There is also a requirement for optimising residential floor space and at least 50% of the additional floor area. This could be assessed in conjunction with 104-114 Camley Street (S5)
- Site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.
- The Camden Building Height Study considered that this site is a location where tall buildings may be an appropriate form of development and this is recognised in the site allocation.
- The allocation in the draft Local Plan refers to public realm and connectivity enhancements to strengthen Camley Street as a key route for cyclists and pedestrians, cycling in relation to the Maiden Lane route, and to improvements to the North Camley Street bridge underpass.
- The Camley Street Neighbourhood Plan forms part of the statutory development plan for the area and it will be used alongside the Council's Local Plan in the assessment of any planning applications.
- The proposed allocation expects applicants to liaise with Thames Water regarding water supply and wastewater network capacity.
- The cost of decking over railways lines is significant and requires detailed assessment and feasibility work.

## **Policy CSP3 – 104-114 Camley Street and Cedar Way**

### **2020 Consultation Responses (Email)**

#### Mix of land uses

- While it has potential to retain an element of employment space, it may be appropriate to apply this on a site allocation wide basis, rather than for individual plots. (GE CIF Property Nominee Company No.1 Ltd & GE CIF Property Nominee)
- The policy should refer explicitly to offices. Due to its proximity to King's Cross and Camden Town, this means that it offers a real opportunity for large scale offices alongside housing.
- The SALP should be clear that industrial capacity is to be reprovided and that a full range of industrial uses that support the local and CAZ economies are

appropriate. Where industrial capacity is lost, the affordable housing threshold is 50%.

- The quantum of office space should be specified to ensure it does not undermine the consolidation of space in the Central Activities Zone or town centres.
- The existing role of the food preparation, distribution and other food-related services should be recognised.
- More emphasis is needed on compliance with the Neighbourhood Plan – retaining existing businesses and providing affordable housing.

#### Height and density

- The policy is silent on whether the site is suitable for tall buildings: a tall building at 104 Camley Street would relate well to the hierarchy of taller buildings in the area and make a positive contribution to the streetscape.

#### Co-ordination of proposals

- In an ideal world, redevelopment would come forward on a comprehensive basis, however, this may not be realistic and could significantly delay regeneration opportunities. The policy wording therefore should be amended so that there is flexibility for sites to come forward on an individual basis where appropriate.

#### Delivery of infrastructure

- Figure 6.4 shows new/improved public spaces and pedestrian routes and where greening should be improved – these matters should be addressed as part of a master planning process. Open spaces should be practical, sufficient to be enjoyed by the public and should not comprise a series of sporadic and token spaces purely to satisfy policy.
- Figure 6.4 shows a new public route running through the middle of the site. Requiring a public route through the middle of the site would significantly reduce the opportunity to optimise the use of the space for redevelopment. It would be more effective to retain the existing route along Camley Street and introduce a route at the rear of the site towards the railway tracks. (Metropolitan Properties)
- Support, especially criterion f. East/ west link should include cycles as well as pedestrians. (Camden Cycling Campaign)
- Do not support proposals for a new pedestrian bridge between 103 and 101 Camley Street. A crossing further west is preferred (between St Pancras Way and Elm Village). (Canal and River Trust)
- The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development

### Other

- The whole area is crying out for good redevelopment and these outline plans and guidelines seem appropriate.
- The indicative housing quantity should be expressed as 'at least' 750 homes. (GE CIF Property Nominee Company No.1 Ltd & GE CIF Property Nominee)
- The map given in this section covers the sites 104 - 114 Camley St and also 3-30 Cedar Way. This needs to be corrected.
- From this site there is a good option to generate access to the triangular site to the East bounded by the three railway tracks.
- Should reference employment opportunities for all socio-economic groups in Camden.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The allocation applies to all the plots within the allocation site boundary and includes office use as one of the allocated uses.
- The allocation seeks to include a range of uses including industrial uses that support the local and CAZ economies whilst also looking to achieve optimal housing capacity.
- The existing uses including food related businesses are noted in the site description
- Site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.
- There is also a requirement for optimising residential floor space and at least 50% of the additional floor area. This could be assessed in conjunction with 120 -136 Camley Street (S4)
- The Camden Building Height Study considered that this sites is a location where tall buildings may be an appropriate form of development and this is recognised in the site allocation.
- As a large development site with multiple parcels it is considered appropriate to ensure that there is a coordinated approach across the sites to ensure the optimal outcomes in terms of meeting both economic and housing objectives.
- Proposed routes are not shown on the maps included in the draft Plan.
- The allocation in the draft new Local Plan refers to cycle provision in relation to the east west link and to a potential new canal crossing to improve connectivity between King's Cross, Camley Street and St Pancras Way.
- The Camley Street Neighbourhood Plan forms part of the statutory development plan for the area and it will be used alongside the Council's Local Plan in the assessment of any planning applications.

- The proposed allocation expects applicants to liaise with Thames Water regarding water supply and wastewater network capacity.
- The indicative housing capacity figure is based on an urban design assessment of potential taking into account site context and constraints.
- The site boundary is correct. The name of the site has been updated to include reference to Cedar Way.

## **Policy CSP4 – Parcellforce and ATS Tyre Site**

### **2020 Consultation Responses (Email)**

- The SALP should be clear that industrial capacity is to be re-provided and that a full range of industrial uses that support the local and CAZ economies are appropriate. Where industrial capacity is lost, the affordable housing threshold is 50%.
- The quantum of office space should be specified to ensure it does not undermine the consolidation of space in the Central Activities Zone or town centres.
- Support, especially criteria b and c

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council response**

- The allocation includes a range of uses, including industrial uses, that support the local and CAZ economies whilst also seeking to achieve optimal housing capacity as part of a mixed use development.
- The site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.

## **Policy CSP5 – St Pancras Hospital**

### **2020 Consultation Responses (Email)**

#### General

- The SALP states that the site area is 2.17ha, however the development site area is 2.18ha.
- Support the approach.
- The status of maps/figures used in the SALP should be clarified. Presumably each one is illustrative. They should not preclude further new routes coming forward nor 'fix' the routes shown as this could hinder the most efficient use of land or appropriate architectural approaches to the layout of sites, new buildings and the

spaces around them. Therefore, they should be labelled as “For Illustrative Purposes”.

- Support the sentiment regarding the importance for parts of the hospital site to be planned holistically.

#### Proposed uses

- The proposed uses should be amended to include retail/food and drink and leisure uses as these are fundamental to activating ground floor public areas.
- While Knowledge Quarter uses are important, other employment uses may also be appropriate and should not be precluded.
- Would like to see key worker housing as well as social homes. Consideration should be given to supported living and third age housing.

#### Transport matters

- Do not object to the principle of a new canal crossing providing that other pedestrian and cycling improvements are also considered.
- Would like to see opening up of the site with (green) routes extending north, south, east and west. These should also take into account use by visitors that are visually impaired.
- Development should enhance its surroundings without disturbing the restful nature of the church and gardens. The gardens should remain cycle free.

### **2021/ 22 Consultation Responses**

No further responses were received

#### **Council Response**

- The site area has been updated in the draft new Local Plan.
- Proposed routes are not shown on the maps included in the draft Plan.
- The proposed uses do not specify retail / food and drink use (employment) but an active frontage is recognised as important along Granary Street and St Pancras Way.
- The allocated uses for this site in the draft new Local Plan are health, permanent self contained homes, education and employment, which could include knowledge sector uses. It is not considered appropriate to specifically identify food and drink uses in the allocated uses.
- The approach to key working housing in the draft new Local Plan is set out in the housing chapter and will apply to all relevant schemes.
- New public routes through the site have been identified for pedestrians and cyclists.
- Draft new Local Plan policy T2 will ensure that development must be designed to promote walking and wheeling for all pedestrians including those impaired and will apply to all sites.

## **Policy CSP6 – Shorebase Access Site**

### **2020 Consultation Responses (Email)**

- Support a housing-led scheme on this site.
- The indicative housing capacity needs to be clarified.
- The methodology for the London Industrial Demand Study included land for transport infrastructure. Camden should ensure it has met its industrial demand before this site is released from industrial use or the site allocation should include B1(c) use.
- Support a southern access point to St Pancras Gardens as long as this respects the historic nature of the church and does not disturb the restful nature of the area.
- This site acts as a key access point to the railway logistics centre, known as Shorebase. Access to this needs to be maintained, however the entrance could potentially be relocated to the south to enable development on the north of the site.
- Whilst access to the gardens should be step-free, cycles need to be actively discouraged.
- Would like to see routes past and through the site with provision for the visually impaired.
- Support a more active and greener street edge.
- Development on this site must not overshadow the gardens and should respect local views across the gardens. The setting of the church and Soane monument are particularly important.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The draft new Local Plan allocates the site for a housing led scheme, and recognises that the site is considered suitable for both commercial and residential use.
- The indicative housing capacity is based on an urban design assessment including site context and constraints.
- The draft new Local Plan is supported by an Economic Needs Assessment which considered demand for employment uses, including industry.
- Specific reference to a southern access from St Pancras Gardens is not included in the allocation in the draft Plan. Any access would require more detailed assessment, and have to be for pedestrians only and not harm the setting of the listed building and gardens.
- The allocation states that development must ensure that operational access to the Shorebase facility is maintained.

- Draft Local Plan policy T2 will ensure that development must be designed to promote walking and wheeling for all pedestrians including those impaired and will apply to all development sites as appropriate.
- The importance of the setting of the St Pancras Church and Gardens is recognised in the allocation.

## **Policy CSP7 (a- d) - Other development sites**

### **2020 Consultation Responses (Email)**

- It is unclear what the existing uses are for these sites: where there is industrial capacity this should be re-provided unless it has been consolidated as part of a masterplan.
- The term 'commercial' should be clarified.
- The quantum of office space should be specified to ensure it does not undermine the consolidation of space in the Central Activities Zone or town centres.

### **2021/ 22 Consultation Responses**

No further responses were received

#### **Council response**

- Agar Grove (CSP7a) is a housing estate regeneration scheme. No other uses are proposed.
- Bangor Wharf (CSP7b) now has a full allocation where the objectives for this site are clarified.
- CSP7c and CSP7d have planning permission and are under construction.

## **Section 7: Holborn and Covent Garden**

### **Policy HCG1 - Holborn & Covent Garden Area**

#### **2020 Consultation Responses (Email)**

##### General

- Strongly support the wider policy objectives, particularly strengthening the areas role as gateway for businesses, improved commercial and retail offer, higher quality public realm and new self-contained homes, making efficient use of land and maximising opportunities for urban greening.
- In the policy 'must' should be changed to 'should' to provide additional flexibility. This would be consistent with the policy for non-allocated sites.
- Welcome wider policy objectives for areas such as Holborn and Covent Garden.



- Policy identifies a capacity of 400 additional homes in the area and refers to Great Ormond Street Hospital for Children NHS Foundation Trust's masterplan (HCG5g) but no context or a summary of this provided.
- Support the objective to strengthen the area as a gateway for business.
- Welcome the recognition of Tottenham Court Road as an Opportunity Area, shared with Westminster, as set out in the London Plan. Growth here will be supported by the Elizabeth Line
- Welcome the preparation of an urban design study
- Good to see reference to Holborn Liveable Neighbourhood Scheme but should also refer to the proposed closure of Procter Street as part of this scheme
- Para 7.4 - paragraph will need to be updated to be in line with the new London Plan, for example, Table 2.1 identifies indicative capacity at Tottenham Court Road for 300 homes and 6,000 jobs

#### Efficient use of land

- Policy wording should recognise the area as one of the most accessible parts of the Borough and support the intensification of the area through higher-density redevelopment of existing properties and infill development as set out in the supporting text.
- Given the Borough's finite land supply, higher density developments should be supported where it maintains a high quality of design and respects the surrounding heritage and local amenity.
- Support the approach to make the most efficient use of land which is consistent with the NPPF.

#### Food and Drink uses

- The expansion of food, drink entertainment uses should not be focused solely on 'Central London Frontages' and 'Growth Areas' of Holborn and Tottenham Court Road. This should be widened to promote opportunities across much of the Holborn and Covent Garden Area.
- The designated areas play an important role to larger organisations and developments, which naturally command higher footfall and therefore higher rents, they do not lend themselves to the Borough's smaller independent businesses. Therefore, the policy should promote food, drink and entertainment uses into established commercial areas such as Seven Dials with a well-integrated and mixed community supporting local employees, residents and visitors.
- Welcome the aim for active frontages with a broad variety of town centre uses.

#### Proposed uses

- All uses should be supported where appropriate and offer interesting new businesses ideas which helps put Camden (and London) at the cutting edge of innovative businesses.
- Fundamental that future policies support a diverse spectrum of business opportunities, provides a degree of flexibility, and does not simply place 'blanket' restrictions which stifle innovation, business investment and potential new employment opportunities.

- Camden Council should not seek to restrict any uses but consider each one a case-by-case basis.
- Need to reverse the decline in evening and night-time uses, which in recent years have continued to decline due to policy restrictions.
- Uses should be encouraged to return in appropriate locations.
- Welcome the aim to increase green infrastructure in line with intend to Publish London Plan Policy G5.
- Support (f) which seek contributions from new development towards a safe and attractive network of routes for pedestrians and cyclists. We would recommend that specific measures that developments are expected to deliver/contribute towards to support this are also referenced within the policy e.g. servicing initiatives

### Infrastructure Priorities

- Crossrail will have a significant impact upon the area of HCG, only making it more accessible which demonstrates a need to maximise the density and making the most efficient use of land / buildings within the area.
- Improving telecommunications connectivity using fibre, thereby helping the increasing number of tech businesses within the borough which require faster communication services every year should be a key priority.
- Shaftesbury will continue to work positively with the Council on existing and future highway improvement schemes in and around Seven Dials.

### **2020 Consultation Responses (Commonplace)**

#### What development priorities do you think the policy should focus on ?

4 people responded to this question raising the following points:

- General look and feel of the place/ improving how people move around/ environmental improvements. (2 responses)
- Improving how people move around the area. (1 response)
- Making efficient use of land. (1 responses)

Other comment – Ensuring that the area does not become unliveable because there is so much simultaneous construction

#### How could the policy be changed to be more effective?

4 people responded to this question as summarised below:

- Maintain the rich variety and texture of groups of individual buildings and prevention of wholesale destruction of groups of buildings with monolithic replacements.
- Stop facadism.
- Ensure that not too much development is going on at any single time and that the health and well-being of residents is prioritised.
- Need to be putting out information that the residents of the area can access, including those who are not internet IT literate. Impossible for some to understand how to use your maps.

- Ensure it is reflective of the area's Central London location and that it is cognisant of National, Regional and Local Level Policy.

#### What type of infrastructure needs to be prioritised in this area?

4 people responded to this question identifying the following priorities:

- Arts & culture
- Public transport and walking and cycling
- Open space
- Health and well-being
- Facilities for elderly
- Facilities for young people
- Education and sports and leisure

#### Other comments

- More small developments. Encourage smaller retail. Stop large retail taking over several small units - they have plenty of places to go.
- Small enterprise - esp. artisans and cultural enterprise - should be encouraged through creative use of business rates.
- Some concern was expressed regarding the programme used for consultation and its user friendliness and accessibility.

### **2021/ 22 Consultation Responses (Email)**

#### General

- In the policy 'must' should be changed to 'should' to provide additional flexibility. This would be consistent with the policy for non-allocated sites.
- HCG1 not specific enough to be capable of support, or a useful guide to policy application to specific proposals.
- It is surprising that there appears to be no reference to the educational or cultural activities in the area, observation extends both to university and further education (including the City Lit), as well as ensuring there is adequate school provision for the increasing number of families which the housing policy implies.

#### Transport matters

- The document lumps together cyclists and pedestrians and is silent about scooters. The unspoken assumption appears to be that their interests are entirely aligned but can be a conflict, notably the use of very limited pavement space, both for travel and for parking of cycles and scooters. Mobility scooters will be on the increase and demographics will mean that the Council will need to work with TFL to develop a coherent and realistic set of policies.
- Bus routes need to be rethought, as the area is going to be used permanently as a bus parking area, safe spaces dedicated for the purpose need to be built into the plan. Buses sometimes park on pedestrian crossings and reduce visibility for those crossing the street.
- Need for public conveniences for those visiting the area should not be overlooked. Public urination is a constant problem.

## **2021/ 22 Consultation Responses (Commonplace)**

### What development priorities should be the main focus of the policy?

6 people responded this:

The top three priorities related to Building Heights, Climate Change and Design and Heritage matters

### What specific points do you think should be included in the policy?

9 people responded to this question raising the following points:

- Any new development should encourage small independent retailers.
- There should be a moratorium on building higher
- Retrofitting / reuse should be priority (5 responses)
- Demolition should not be allowed due to embodied carbon
- On street parking should be consolidated and removed and given over to pavements and cycleway
- Reduce hardstanding to reduce flood risk
- Existing buildings in Conservation Area should be retained (3 responses)
- New public spaces should be provided
- Public housing should be the priority

### What type of homes should be provided?

- Priorities identified for new homes included affordable housing (5 Residents)

### Is there anything missing from the wider area that could be provided on site?

6 people responded to this question raising:

- Safer cycling facilities
- Pedestrianised street are needed
- Artist studios
- Open space
- Public toilets
- Tourist information space (2 responses)
- GP surgery (2 responses)
- Nursery / crèche (2 responses)
- workshop space for the theatre and film industry (2 responses)
- Residential care home.
- Centralised area for deliveries

### Is there a need for new or improved infrastructure to support additional growth?

6 people responded :

- More space for people walking and cycling (2 responses)
- A tube shuttle is needed connecting Euston and Waterloo directly to High Holborn
- There is no need for further growth (2 responses)
- Policy should be for reuse existing structures (2 responses)
- Create more family housing (2 responses)

- More green space and trees

#### Is the area or any site suitable for a taller building?

8 people responded to this question

- 1 response said yes the area and in particular 1 Museum street is suitable subject to high quality design and no overshadowing
- 7 other response did not consider the area suitable for tall or taller buildings and specifically not Selkirk house

#### Any other comments.

Specific comments were made about 1 Museum Street which are considered below.

### **Council Response**

- The proposed draft new Local Plan does not include an allocation for the Holborn and Covent Garden Area in the form included in the Site Allocations Local Plan. The Council's approach to this area now is set out in Policy S1 - South Camden and individual site allocations.
- Policy S1 supports a range of uses in the area, and acknowledges the Holborn Vision the delivery of the Liveable Neighbourhood scheme for Holborn.
- Draft new Local Plan Policy S1 - South Camden identifies a number of key infrastructure priorities for the area, including the upgrade to Holborn Underground station.
- Any flexibility in the policy wording is introduced through specific criteria and therefore it is not considered necessary or appropriate to remove the word 'must' from the start of the policy wording.
- Connecting, improving, make public and where possible reinstate historic lanes, alleyways and passages in and around Holborn remains an objective for the area and is included in Policy S1 and individual Site Allocations.
- Holborn remains area of focus for development due to the role it plays in contributing towards the area continued success and London wide role.
- The S1 policy and new draft Local Plan policies for supporting town centres and high streets will be used to assess retail applications and the Evening and Night time Economy Strategy will be used in relation to night time uses.
- The Council's approach to a number of matters raised (such as food and drinks uses, education and cultural uses and activities, public conveniences and tall buildings) are covered by topic specific policies in the draft new Local Plan and individual allocations as appropriate.

## **Policy HCG2 - Former Central St Martins**

### **2020 Consultation Responses (Email)**

- Support the policy and particularly the retention of the Grade II\* Lethaby building.
- Request the inclusion of additional text regarding materials and solid to void ratios. Suggested text 'Materials used for any new buildings should be drawn from

the local historic environment, particularly those of the Lethaby Building, and proportions and solid-to-void ratios should also respect those of the historic environment.'

- Support the policy and good to see reference to Holborn Liveable Neighbourhood Scheme, but this should also refer to the proposed closure of Procter Street as part of the Liveable Neighbourhood Scheme.

## **2020 Consultation Responses (Commonplace)**

2 people agreed with the proposed uses and the assumed residential capacity

What changes do you think need to be made to make the policy more effective?

2 people responded to this question as summarised below:

- Resist monolithic replacements for mixed and diverse groups of smaller buildings. Keep a rich texture. Alleys, walking routes and small open spaces are vital.
- Additional homes should be for people working in the area, for instance at Gt Ormond Street hospital, not for buyers to rent out or keep empty.
- Include as much greenery, trees as possible

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- Support for policy and retention of Lethaby building noted
- The wording in the allocation of the requirement for exceptional architectural quality that responds to the sites context is considered sufficiently strong to ensure development properly respects the historic environment.
- The Holborn Liveable Neighbourhood scheme will be published for consultation early in 2024 and the allocation could be updated once this has been approved.
- The Council's approach to a number of matters raised (such as the design of the buildings, walking routes, nature of housing provision and inclusion of greenery) are covered by topic specific policies in the draft new Local Plan.

## **HCG3 - 1 Museum Street**

### **2020 Consultation Responses (Email)**

- Support the redevelopment of the site for a true mix of uses to attract new economic activity. Uses should include replacing the existing hotel, housing (including affordable housing), retail and other appropriate town centre uses

### Height and design

- Subject to the delivery of outstanding architecture and public realm enhancements the site is suitable for a taller building, Accordingly, the policy text should be amended to replace the requirement to ensure any replacement building is of a height and massing that can successfully integrate into the

townscape, with a requirement to 'ensure a design-led approach is taken to delivering the optimum amount of development at the site, recognising its suitability for a taller building'

- The existing building has a negative impact on the Bloomsbury Conservation area and the nearby Seven Dials Conservation Area. We support Policy HCG clause (b) and hope that serious consideration can be given by any developer to the reduction in height of this building
- New towers should be resisted except where they replace existing ones
- The historic environment of West Central Street has been overlooked, to ensure its enhancement we suggest the following additional policy requirement: 'Ensure that any development along West Central Street and Museum Street responds to its architectural and historic context, and aims to enhance the historic environment in these areas'

#### Other

- We do not envisage any infrastructure concerns in relation to water supply or the wastewater network, but the developer and local authority should liaise with Thames Water to advise about phasing

### **2020/21 Consultation Responses (Email)**

#### Comments on planning application 2021/2954/P

- Save Museum Street is a community coalition including Bloomsbury Association, Covent Garden Community Association, Tavistock Chambers Residents' Association, Willoughby Street Residents' Association, Leicester Square Association, Charlotte Street Association, Covent Garden Area Trust, South Bloomsbury Tenants & Residents' Association, West Central Street Residents, Grape Street Residents, Drury Lane Residents, The Bedford Estates, Seven Dials Trust, Save Bloomsbury and Soho Society. The coalition has submitted a detailed critique of the application against national, London-wide and Camden policies across eleven topic areas, which concludes that granting permission would be unsafe and inconsistent with national and local planning policies.
- The planning application scheme is fundamentally flawed and would be severely visually and environmentally damaging to the immediate surroundings, the sensitive Conservation Areas and the whole of London. The quality of the proposed housing is poor. Cosmetic changes such as additional housing units or a reduced height tower will not make this acceptable
- The current planning application for 1 Museum Street should be rejected

#### General

- The planning brief for HCG3 is a copy of the developer's planning application. The application has received over 250 separate objections, which the Council must analyse and report when considering the response to the design brief, as the negative comments on the application apply equally to the draft 'Opportunity Development Sites'. Policy HCG3 should be amended to take account of these comments before the draft Plan is submitted for examination

- The application has received over 250 separate objections, our analysis indicates there were 190 objections to excessive height, 178 objections to damage to the conservation area and strategic views, 111 objections to the massive office content, 105 objections to the adoption of a demolish and rebuild approach rather than retrofit, 102 objections to the inadequate provision of low rent housing, 70 objections to the 4-year period of disruption and noise arising from the demolition/rebuild approach, and 43 objections to the cut-through from West Central Street to High Holborn
- The plan should take account of comments submitted on the planning application (2021/2954/P)
- Growth should be controlled so as not to undermine the conservation areas
- Paragraphs 7.23 to 7.30 contain subjective and unsubstantiated comments. Along with parts of Policy HCG3, they appear to be framed with very specific regard to the submitted planning application, which is wrong in terms of due process and governance. They should be replaced with objective policy
- The objectives in Policy HCG3 are mutually inconsistent. The objectives need to be prioritised, with highest priority given to HCG3a and HCG3b
- The area is heavily dependent on tourism, but the proposals do nothing to foster this

#### Comments on demolition and retrofit

- We support the existing wording of HCG3a
- The provisions of HCG3 seem to presuppose that existing buildings will be demolished, they should require justification for any proposed demolition
- The design brief for this development should be sensitive to the location, the needs of the community and the implications of climate change. The structure of the existing tower is sound so there is no reason for its demolition. The need to minimise CO2 emissions needs much more emphasis given Camden's declaration of a Climate Change Emergency. The embodied carbon of new high-rise construction is far higher than that of alteration and retrofit of an existing building. Policy HCG3 should include an unambiguous clause requiring retention, adaptation and beneficial reuse of the existing building as far as possible, and excluding the option of large scale demolition
- Given the Climate Change Emergency, all the buildings in the Conservation Area should be restored/ retrofitted and reused
- The existing historical buildings in New Oxford St and West Central St should be renovated and conserved
- Retrofit of Selkirk House could achieve significant architectural improvement, the original development for Trust House Forte was much more attractive than the budget hotel as subsequently altered
- The 1 Museum Street plan involves demolition of a historic building and should not be allowed
- The plan should ensure the impact of the development process on local businesses and residents is mitigated and reduced by repurposing existing buildings.
- Redevelopment of the hotel and car park are urgently needed



- I agree with demolition of the Travelodge monstrosity

#### Comments on height and tall buildings

- 1 Museum Street is suitable for a tall building, as are other sites, so long as design is high quality and existing public green spaces are not overshadowed to an unacceptable degree
- The existing tower on this site has an adverse impact on the local townscape and heritage environment, the site allocation should seek a built form better fitted to such a sensitive location. The policy should not assume new development will be similarly tall but should note that there are alternative methods of delivering high density development which may integrate more successfully with the surroundings and avoid negative effects on heritage significance. The policy should also take account of the requirements of Policy D9 of the London Plan, which indicates that the appropriate height should be based on an assessment of existing character and historic environment, and its capacity for tall buildings
- The height of the existing building is harmful to the townscape of the Conservation Areas, any proposals to increase the height should be rejected (12 residents, 5 individuals via commonplace), the height should be reduced to a more human scale by removing 5 storeys
- The current wording of Policy HCG3b implies a taller building would be acceptable. The existing building already has a significant impact, a taller structure would worsen problems of overshadowing, and further harm the conservation area, heritage assets (including the Bloomsbury Squares, St George's Church and the British Museum), and strategic and local views. HCG3b should be amended to state 'ensure that any replacement building is of a height which does not exceed the height of the existing Selkirk House'.
- Proposals must respect the objectives of HCG3a and HCG3b.
- The proposal for a taller and bulkier building will not respond to the heritage context or complement the area's architecture and environment as required by HCG3a and HCG3b
- A large modern tower would not be appropriate adjacent to the Conservation Area
- The proposed building will adversely impact the Conservation Area, the British Museum and St George's Church The proposed building will harm local residents and workers through overshadowing and loss of light, and their physical and psychological effects, and through impact on the wind environment
- The proposals in Policies HCG2 and HCG3 are contradictory. In relation to Policy HCG2, the 11-storey 1960s slab and podium block is identified as being one of the tallest in the area, and the plan indicates that a higher building is unlikely to be acceptable due to the surrounding townscape, Conservation Areas and Listed Buildings. It is inexplicable that the same approach is not applied by HCG3 to the 17-storey Selkirk House, where the application being considered seeks an excessively bulky 22-storey tower. There should be no increase to the height of the existing tower as this would further visually damage and erode the local heritage assets such as British Museum and St George's Church, whereas a retrofit scheme that reduced the height would be highly desirable

- Paragraph 7.27 should be amended to remove the suggestion that a taller tower would be acceptable if it was more elegant and refined
- The subjective terms "elegant" and "refined" should be removed from paragraph 7.27
- HCG3b and paragraph 7.27 should make it clear that Selkirk House is already too tall for its context, and the combined height and bulk is already as much as can be accommodated. The following should be added to HCG3b "...integrate with the surrounding townscape *and conservation areas. In particular, ensure that any replacement or extended buildings exceeding 5 storeys do not collectively exceed the bulk of Selkirk House, and that no part of the development exceeds the current height of Selkirk House*"
- Everything north of West Central Street should be kept at its existing height as it is within the Bloomsbury conservation area and its buildings are an integral part of the historic fabric of the area

#### Other comments on the design approach

- The plan should identify a form and scale of development appropriate to the position between three Conservation Areas and in the setting of many important historic buildings, the plan's proposal for growth is not consistent with the location
- Paragraph 7.23 incorrectly states that the site is not within a conservation area, whereas the northern part of the site as currently defined *is* in Bloomsbury Conservation Area, and the text should be amended accordingly
- Paragraph 7.28 should make reference to the Conservation Area and the Listed Buildings on West Central Street to ensure that any alterations to frontages are appropriate to their context
- Infill development should be undertaken on the west side of West Central Street (backing on to Grape Street) to reinstate the fabric and historical street form in this part of the Bloomsbury Conservation Area
- What are the significant public realm improvements planned for the area and referred to in para 7.30?

#### Proposals for a new route through the site

- The proposed 'cut-through' from West Central Street to High Holborn should be resisted, as there is no historical precedent for it, it will lead nowhere (going to a four-lane highway at High Holborn with no crossings) and will cause considerable harm to the integrity of the surviving historical street network. The reference in paragraph 7.29 to providing a new public route should be deleted. It seems to be a mechanism for increasing commercial floorspace, but will be claustrophobic and potentially unsafe, be a source of noise problems and antisocial behaviour, and will not improve connectivity between Covent Garden and the British Museum
- The proposal for a new north-south route will produce a dark, narrow and unsafe alley, and emerge on a busy highway with no safe or logical crossing point for pedestrians, and no continuation into Covent Garden. It should be removed
- The supposed benefits of creating this alley do not justify development of an 80 metre tower

- The cut-through will damage the architectural integrity and urban context of the fine terracotta clad building on the east side of Grape Street housing the Cuban Embassy
- The plan implies a decision has already been taken to introduce this alley, which prejudices what should be an independent and objective consultation
- The policy should demand major improvement to the Drury Lane – Museum Street axis to mitigate the overbearing effect of existing tall buildings, satisfy public open space and landscape requirements and create vibrant activity at street level

#### Comments on the proposed uses

- The proposed mix is dull and unimaginative, a mixture should be sought to enhance and support existing commercial concerns and local neighbourhoods, including: off-street car-parking for electric cars; public cycle parking with associated storage and showers; a destination tourist facility with access to the former GPO train system, tourism information and public toilets; theatre and film support facilities with rehearsal and performance studios, post production facilities, set and lighting design and storage; specialist workshops particularly aimed towards film and video production; residential, especially affordable housing; hotel/ short-stay accommodation such as a 50-80 bed YMCA; publicly accessible open space at roof level (as achieved by the City Corporation); and public facilities like a local doctor's surgery. Improved street finishes and planting are desirable but cannot satisfy the Local Plan requirements for new public open space. There is already vacant retail space in the locality, provision of additional retail space should not be prioritised as it will create dead frontages
- Proposed uses should include a nursery/ crèche, residential care home and new public open space
- The uses proposed are pedestrian, offices are in surfeit and are not needed. Housing is welcome but should be social housing and other housing that local people can realistically afford. Covent Garden is a good example of spontaneous regeneration without monolithic offices. Theatre and film related facilities should be sought, with useful local facilities like dentists and doctors. Parking should be retained for electric vehicles, cycles with showers/ public toilets and a delivery hub. The site is ideal for a Tourism Information Centre
- It is doubtful that there is a need for more commercial space, there are vacant offices nearby and vacant shops and catering spaces nearby e.g. at the Post Building
- Development should be truly mixed use, not dominated by speculative offices
- Proposed uses should include a much-needed GP surgery and a visitor attraction that reflects the outstanding cultural background and history of Bloomsbury and Covent Garden
- We believe the requirement for offices in this area has already been met, and the need for further offices is doubtful post-Covid. Speculative offices and additional ground floor retail risks creating a glut of unused premises and a sense of disconnection and environmental gloom, as occurred with the office space at Centre Point and the retail at the neighbouring St Giles development

- HCG3c should be deleted, the aims of paragraph 7.28 can be met without "maximising" active uses, which would be likely to lead to uninterrupted rows of hospitality venues, which are difficult to service and not welcomed by the existing community. The HCG3a approach is particularly inappropriate for West Central Street
- HCG3d should be amended so that the location of the public space is not constrained and should ensure that space is open and easily accessible during daylight hours. However, we support the existing wording of HCGf
- The variety of uses at ground level fronting Museum Street and High Holborn should be maximised. The current proposals involve a massive office reception long the full length of the Museum Street facade, mirroring a similar office foyer opposite (at the Post Building) and creating a completely dead frontage on both sides of the street
- New public open space should be provided in accordance with Camden's planning policy A2. Landscaping to the thoroughfare and pavements does not constitute open space
- The vacant site next to the Old Fire Station could be used as green space
- More offices are not needed given the increase in home-working, community services and affordable housing would be better uses, and should be prioritised
- The area would benefit from more residential floorspace rather than offices
- Green space should also be included
- Proposals for vast office increases and minimal housing increases can't be justified in the context of the housing and homelessness crises
- The policy should require a meaningful quantity of homes to address the acknowledged shortfall
- Affordable housing should be prioritised
- Policy HCG3 should prioritise the development of affordable housing in line with the London Plan, housing should not be subservient to speculative office space as the development driver
- A new clause should be added to HCG3 to indicate that any housing contribution should be directed to permanent social rent housing on site
- Paragraph 7.26 should acknowledge that some parking provision must remain on site to facilitate building management, repairs and other local needs
- Car parking should be retained for electric vehicles.
  - The basement of Selkirk House should be retained as a distribution hub
- The removal of all vehicular parking should not be viewed as a benefit, private vehicles may be viewed less prejudicially when they are electric, existing space could be reused as follows:
  - parking is needed for residents and contractors, e.g. those working on climate change retrofit;
  - off-street parking is ideal for electric vehicle charging;
  - there is a case for moving some cycle and scooter stands (including for hire) off street;
  - the former green vehicle delivery hub in the basement could be re-provided;
  - a recycling collection point could be established off-street;

- storage could be provided for diplomatic vehicles associated with the Cuban Embassy in Grape Street

### Boundary and extent of site

- This site is effectively four plots (former Travelodge; former NCP Car Park; low rise block bounded by West Central St/ Museum St/ New Oxford St; vacant lot west of West Central St). There is no clear planning policy reason for treating them together, they have little in common except the accident of common ownership. The highway should be excluded from the site
- The boundary has no sound planning justification and appears to follow the land assembled by LabTech for its proposed office tower
- The area north and east of West Central Street is in the Bloomsbury Conservation Area and should not be amalgamated with the Travelodge site
- The development site should be restricted to the current Selkirk House site boundary plus the adjacent vacant plot on the west side of West Central Street up to the Old Fire Station. It should exclude properties at 16A-18 West Central Street, 35-41 New Oxford St and 10-12 Museum Street. These buildings in Bloomsbury Conservation Area should be restored/ reused in line with conservation area policies and not dependent on a planning application for the Selkirk House development site. Disparate elements of the townscape should not be combined into a single policy on the basis of their ownership by the same developer
- Respect for local context cannot be achieved by combining the building blocks, this will lead to over intensive development on the northern part (within the Conservation Area) in an attempt to provide the obligations arising from massive commercial development of the southern part
- The block bounded by West Central St, Museum St and New Oxford St should have its own policy to protect the human-scale streetscape that extends westwards to the Umbrella shop [53 New Oxford St].
- It may be helpful for proposals relating to the northern block to include *all* buildings in the area bounded by West Central St, Museum St and New Oxford St.

### **Council Response**

- A large number of the comments received related to the specific planning application for the site that had been submitted at the time of the consultation on the draft Site Allocations Local Plan. Comments on the application that had a bearing on the wording of the site allocation have been taken into account in preparing the allocation included in the draft new Local Plan.
- The allocation has been drafted to secure the Council's key objectives for the site not based on the submitted planning applications for the site.
- The allocation seeks a mixed use development including town centre uses, which potentially could include a hotel use.
- Other specific uses suggested for the site, such as doctors surgery, creche, workshops for film related uses etc could still be considered as part of a mixed

use scheme and would be assessed against topic specific policies in the draft new Local Plan.

- The Council has undertaken an Economic Needs Assessment, which demonstrates that there is a need for additional office provision within the Plan period.
- The allocation requires consideration of the heritage context including listed buildings / heritage assets and the conservation area. The description of the site has been updated to reflect the listing of some of the buildings on site.
- The allocation has been amended to include reference to the need to consider the retrofitting and reuse of existing buildings in accordance with the Draft new Local Plan Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings.
- The Camden Building Height Study considered that this site is a location where tall buildings may be an appropriate form of development and this is recognised in the site allocation.
- The acceptability of any tall building proposal, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies, including policies on heritage and design.
- The allocation has been updated to identify that elements of the site are within the conservation area.
- Reference to public realm improvements in the area has been expanded to refer to the planned improvements as part of the Holborn Liveable Neighbourhoods project, which will be consulted on in early 2024.
- The allocation has been amended to refer to exploring the options for a safe and welcoming route across the site to help improve permeability
- The proposed uses for this site include office provision as part of a mixed use development. Draft Local Plan policies including IE2 (offices) recognise the importance in supporting the strategic functions of Central London, where there is an established commercial and mixed use character.
- The allocation seeks to reprovide the existing residential floorspace and provide additional self contained residential homes, including the provision of affordable housing, in accordance with the Plan's approach to housing.
- The allocation recognises the importance of active uses to create safer places.
- Open space provision should be made in accordance with draft new Local Plan policy SC3 - Open space.
- The allocation promotes the removal of the multi-storey car park, which is in accordance with the Plan's car-free approach and any onsite parking provision will be considered in line with draft Local Plan policy T5 - Parking and car free development.
- It is appropriate for the boundary of the site allocation to reflect the likely area for development, as being promoted by the owners.

## Policy HCG4 135-149 Shaftesbury Avenue

### 2020 Consultation Responses (Email)

- We agree to the principles to retain the Grade II listed building and to ensure that its fabric and settings are protected, restored and enhanced.
- We object to the allocation of the site for a cinema or theatre use as the primary use. The site is currently occupied by a failing cinema use and the significant heritage value is only the external walls of the theatre walls as the internals have been lost.
- The primary goal for this site should be to secure a vibrant mix of town centre uses which celebrate the building's history which is conducive to restoring the significance of the built fabric of the former Savile Theatre.
- Specific policy wording should be amended to cultural or leisure uses in general rather than dictating the cinema / theatre function.
- Welcome the identification of the site for a theatre/cinema.

### Design

- Support the retention of the main, front entrance as the primary entrance to the building, as there are opportunities for activating the blank facades facing St Giles Passage, New Compton Street and Stacey Street, including windows, entrances and active ground floor uses that contribute to the life on the street.
- The policy requirement relating to the roof should be amended to read: 'Ensure that any roof extension is of exceptional architectural quality and entirely integrates with the design of the current building. Any roof extension should be of the same materials as the host building and should preferably not be visible from the public realm.'
- On the information available to date, we do not envisage infrastructure concerns regarding water supply network infrastructure/wastewater treatment capacity in relation to this development/s.

### 2020 Consultation Responses (Commonplace)

#### What changes do you think need to be made to make the policy more effective?

1 organisation – Theatres Trust responded as summarised below:

- Stronger protection for Cinema/Theatre which is likely to preclude off-site housing.
- Trust would question the appropriateness of contributing towards self-contained homes from this site if it is retained for cultural use as proposed. This could undermine the viability of any such proposal.
- It may be appropriate to specify a contribution towards housing should a non-cultural development come forward and loss of existing cultural use is deemed acceptable. But caution against promoting alternative uses on this site in particular housing as this is not necessarily compatible with cultural uses.
- There is need for additional large-scale theatre in the West End for which evidence can be provided and this should be the primary allocation for this site.

## 2021/ 22 Consultation Responses (Email)

### General

- Since the allocation was first drafted there has been a planning inquiry relating to the refusal of permission on this site. The inspector dismissed the appeal. Secondly, there has been the discovery of more of the original theatre interior.
- Reference should be made to the updated Historic England listing.
- The Odeon site is vulnerable to unacceptable change as it does not lie within a conservation area but adjoins two - the Seven Dials (Covent Garden) CA (south side of Shaftesbury Avenue) and the Denmark Street CA (north side of New Compton Street).
- Suggest the inclusion of an additional point that the important frieze should be restored including the original lighting configuration, and the original design above the main entrance restored. Original elements of the Saville should be retained unless it is clearly demonstrated they would detract from the main use as cinema/theatre.
- Suggest that you remove paragraph 7.35, or at least delete the last sentence, because cinema and theatre operators have clearly been identified since the last version of the Site Allocations policy document.
- Any major construction should be kept to an absolute minimum and can only be justified if the use of the building is predominantly for a cultural facility with absolutely no room for unwanted and unneeded commercial housing or hotel accommodation, which is intimated in a policy that considers a mixed-use scheme as acceptable.

### Proposed uses

- Strongly support the protection of the Theatre use. Ideally this will be the sole use and that mixed use, even with performance as the primary use, will be much less satisfactory.
- Object to the proposed wording for cinema or theatre use as the listed theatre building has never been altered.
- The predominant use must be theatre / cinema and any other uses must be ancillary. It is not possible to have both a mixed use scheme and a predominantly live theatre / cinema use.
- The use of 'predominant' should be avoided.
- Suggest the wording is amended to read that provision of any other uses are considered acceptable only if ancillary to the cinema or theatre and occupy no more than 15% of the sites floor area.
- The Inspectors decision explicitly stated that the future uses needs to be in a single use.
- The wording should refer to reinstating the theatre use as there is not currently a theatre use on site.
- The building was designed for, and has existed historically, as a single use venue and we do not see any justification that the quiet character and of the neighbourhood, or the viability of The Phoenix Garden Charity, should be



irrevocably compromised for anything less than restoring the venue as a single use cultural facility.

- The potential to include a cultural facility within a mixed use scheme opens the door for interventions that will not be appropriate for the site and would be incompatible to the buildings role within Theatreland.
- The suggestion of a mixed use potentially inflates the price of the building thus potentially making the theatre / cinema use unviable.
- Wording must allow for the reinstatement of the original theatre role in the future.
- Include reference to in the event of theatre use wherever possible make use of the remaining elements of the Saville Theatre and with cinema use, where possible, reveal these original features.
- The encouragement of permanent self contained homes in the wider area is likely to conflict with the general thrust of the policy and muddies the argument for cinema / theatre use.
- Any housing contribution needs to allocate to a site in the immediate vicinity or by way of acquiring existing market housing and making it social need housing.  
(Resident)
- Any housing contributions should be directed towards low rent, self contained homes in the wider area.

#### Design and roof elements

- The requirement for the design to be of exceptional architectural quality to complement and enhance the host building is supported but is considered insufficient. Scale, height and massing should also be addressed. No upward extension would be preferred but any extension should be limited to single storey, given the proximity to the community garden.
- Object to the potential for a roof extension of 'exceptional architectural quality'. There must be no opportunity for a large roof extension however well designed. One floor may be acceptable if well set back and in proportion to the listed building.
- Any extension should be limited to one storey max 4m to the external finishes and set back to protect the proportions, residential amenity and community garden.
- Any roof extension should not exceed one storey and be well set back so as not to harm the proportions of the building, protect amenity and the listed building.
- Any extension must protect daylight amenity of residential units and community garden to the rear.
- Roof extension should be restricted to a single storey, to ensure no detrimental impact on Phoenix Garden, particularly the green roof.
- Activation of the facades in this case is not supported as the streets to the sides and rear are naturally quiet and need no activation, activation of the rear of the building would be particularly undesirable given the proximity to the community garden that provides a quiet haven for residents and visitors alike.
- Object to the activation of blank facades requirement. The opportunity for ground floor vibrancy and "life on the street" must not impact or destroy the quality of life of residents who live in these quiet adjacent streets.

- Remove the requirement for activating blank frontages as this would reduce the available ground floor uses for cinema and theatre uses and having a few quiet streets in the area is a positive contributor to the areas character and the streets concerned are very narrow footways.
- Any activation of blank facades overlooking the garden would pollute the garden with light and sound, obliterating the quiet and tranquil nature that characterises the garden but also disturbing nesting birds.
- Include making use of 'rear entrance' for any secondary uses.
- Include reference to reinstating any original entrances. No additional doors should be punched into the frontage. There is a currently sealed entrance that could be reinstated.

#### Public realm improvements

- Object to the encouragement of activity around the building, especially to the rear, due to the impact on the community garden during the day and more activity at night would harm residential amenity.
- Suggest the removal of reference to better lit routes and encouraging activity around the building as the surrounding streets have already had a lighting upgrade with the installation of the Covent Garden Lantern as part of the Covent Garden Lighting Partnership. The rear of the site has the 'quiet' Phoenix Garden and is surrounded by housing. The side footways are very narrow and unsuitable for more 'activity' which should be at the front not the sides or the rear. The side streets are used for loading for both this and adjacent sites.
- Reference to increasing life on the streets should be removed as it is not desirable on these quiet streets.

#### **Council Response**

- The allocated use in the draft new Local Plan remains for cinema / theatre and cultural uses in accordance with Plan policies protecting cultural facilities and are considered appropriate given the design, use and history of the building.
- The allocation has been updated to make it clear that any housing requirement should be provided offsite, given the sensitivity of the site.
- Reference to the appeal decision has been included.
- The criteria relating to the retention of the listed building has been strengthened to include a requirement of a full assessment on the remaining internal historic fabric of the building. This is to ensure that all the latest findings will be taken into account.
- The allocation refers to the building's distinctive features. This includes the friezes and it is not considered necessary to identify them separately.
- The allocation has been strengthened to only consider alternative public cultural uses if it can be demonstrated that a cinema or theatre operator cannot be identified.
- Reference to the design of any extension has been strengthened to ensure any additional roof extension height and massing is appropriate to the site's surrounding townscape and neighbouring conservation areas.

- The allocation does not 'require' activation of blank facades but encourages exploring the option, which would allow consideration of all impacts.
- The use of 'rear entrances' has been included for secondary uses.
- An additional requirement has been included to require developers to work with the local community to protect and enhance the setting of Phoenix Gardens.

## **Policy HCG5 - Other development sites**

### **2020 Consultation Responses (Email)**

#### HCG5 h) Cockpit Yard

- Welcome the opportunity for mixed use development. The site presents the opportunity to accommodate new self-contained homes and deliver an important range of benefits including the retention of the library, the provision of employment floorspace in the form of creative workspace and the retention of the Council Depot facility.
- Consider that due to the site's highly accessible location within central London and policy HCG1 requirement to make the most efficient use of land, the site can accommodate the provision of up to 160 residential units rather than 120, in compliance with and consistent with the current and emerging London Plan, whilst also helping to meet the Government's overarching aim of achieving sustainable development by providing new homes in appropriate locations.
- The optimisation of site allocation HCG5h will help contribute to the future provision of housing sites within LBC and have clear benefit in delivering as many new homes as is reasonable on a highly accessible brownfield site within central London. (U + I Group)
- The site at Cockpit Yard appears to be light industrial / maker space. These uses should be re-provided.

### **2020 Consultation Responses (Commonplace)**

1 person responded and indicated their support for the approach to these sites.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The allocated uses for the Holborn Library and Cockpit Yard site in the draft new Local Plan include employment uses to reflect the light industrial / maker space currently on the site.
- The indicative residential capacity is based on an urban design assessment including site context and constraints.

## Section 8: Kentish Town

### Policy KT1 - Kentish Town Area

#### 2020 Consultation Responses (Email)

##### General

- Support the emphasis of policy KT1 but consider part a) should be split into two to reflect the Locally Significant Industrial Site (LSIS) on the Murphy's site and the Growth Area on the Regis Road site. Within the LSIS, higher density provision of industrial floorspace should allow landowners to promote other land uses.
- Part a) should also refer to Knowledge Quarter uses given the location of the site to King's Cross.
- The quantum of affordable workspace should be defined and robustly justified.
- Remove wording that says 'Large floorplate 'corporate' offices are unlikely to be considered suitable' as proposals need to be flexible and adaptable.
- Policy KT1 should refer to providing additional social infrastructure in the area.

##### Efficient use of Land

- We believe the objective of 2000 homes is impossible to achieve in a way which complies with both the Camden Local Plan design policies and the Greater London Authority's expectation of retaining industrial land. The site is surrounded by conservation areas, and the impact of a wall of towers would be unacceptable. Either Camden needs to accept fewer homes or the Greater London Authority needs to accept less employment land.
- The Secretary of State's 2020 letter to the Mayor of London and requested modifications to London Plan policies on design, industry and housing mean a rethink is required.
- This is not an area appropriate for industry requiring high frequency vehicle movements. Any 'last mile' CAZ supporting uses should be focused to the southern end of the site.

##### Transport Matters

- We fully support the statement in paragraph 8.13 that 'development schemes must carefully consider their impact on junctions, nearby sensitive uses and local roads' but do not see how this is consistent with policies KT1a and b.
- Any development in this area will inevitably increase traffic on already highly congested surrounding roads and junctions and will lead to further delays and an increase in the already dire air pollution. Development should not be permitted without a plan for increasing capacity to deal with additional volumes of traffic and avoiding a worsening of air quality.
- It should be acknowledged that designated views will impact upon the massing and heights at the Murphy's and other sites, which will impact upon the quantum of floorspace and land uses delivered. Should allow for more flexibility in the way

these views are interpreted to allow for development to come forward to meet wider aspirations and priorities.

- In terms of sustainability, we support Part I of Policy KT1 and would encourage the Council to consider supporting passive design measures in order to limit the energy demand for new dwellings.

#### Proposed uses

- Welcome the provision of housing in this area but should firstly demonstrate that the industrial capacity can be re-provided, especially logistics services.
- Welcome the inclusion of light industrial under the proposed uses.
- Welcome the retention or re-provision of the safeguarded waste facility.
- Consider Kentish Town Station is a potential future development site suitable for a residential-led over-station development, which would deliver new and affordable homes. Also consider there to be an opportunity for a tall, landmark building above the station.

#### Infrastructure Priorities

- Recommend policy support for more cycle parking along the current and future cycle network, not only within developments but outside stations and other key destinations within Kentish Town.
- Support, especially criteria e and f. Improved connections and priority for walking and cycling are very important. Support sustainable and active transport measures in the area.

### **2020 Consultation Responses (Commonplace)**

#### What development priorities do you think the area should focus on? :

6 people responded to this question raising the following points:

Environmental improvements (4 responses)

General look and feel of the place/ improving how people move around/ area wide infrastructure improvements (3 responses each)

Get developers to coordinate proposals (2 responses)

#### What changes do you think need to be made to make the policy more effective?

4 people responded to this question and the comments are summarised below:

- More people mean more cars and a busier Kentish Town.
- Make zero carbon a necessity not an ambition.
- Make a car free zone
- Key thing for people already living here is bike and walking access across the site and to the heath; for new residents it is well designed, sustainable, good quality accommodation.
- The policy is non-specific, too generalized and does not feel like there is real vision. It should look at mixture of residential and commercial that augments or complements nearby residential and retail premises.
- Be an antidote to what has been done in King's Cross. Make it realistic, make it interesting and make it an addition to our local area.

- Do not overlap with other facilities but perhaps have a more modern family fitness facility and repurpose the better leisure building into an art hall.

#### Which types of infrastructure needs to be prioritised?

6 people responded to this question identifying the following priorities:

- Walking and cycling and Open Space (5 responses each)
- Facilities for the elderly (4 responses)
- Arts and Culture, Public transport and Health and wellbeing (3 responses each)
- Education and sports and leisure (1 response each)

Specific infrastructure suggestions included a car free zone and market hall facility, or professional offices for hot desking.

#### **2021/ 22 Consultation Responses (Email)**

- Support Policy KT1(a) which expects higher density provision of industrial and other employment uses, providing space for, and a significant increase in jobs in, identified growth sectors, small and medium enterprises and start-ups.
- Support Policy KT1 (d) with its focus on ensuring that the operation of existing businesses is not compromised by the introduction of non-employment uses.
- Remove the requirement for a “comprehensively master planned scheme” and requirement to “facilitate future redevelopment of neighbouring sites”. (Folgate Estates)
- Bridge structures to surrounding sites should not be seen as necessary in order for development to proceed at the site and such a requirement could prejudice, and potentially prevent future development, even though suitable alternatives could be provided.
- Consider Kentish Town Station is a potential future development site suitable for a residential-led over-station development, which would deliver new and affordable homes. Also consider there to be an opportunity for a tall, landmark building above the station.

#### **Council Response**

- The proposed draft new Local Plan does not include an allocation for the Regis Road Growth Area in the form included in the Site Allocations Local Plan. The Council’s approach to this area now is set out in Policy C1 - Central Camden and individual site allocations.
- The allocations for the Regis Road and Murphy sites state that development should seek to contribute to the continued success existing business clusters, including the creative and knowledge sectors.
- Draft new Local Plan policy IE4 sets out the Council’s approach to affordable workspace provision and the quantum of affordable workspace on any particular site will be determined in accordance with it.
- Due to its location and character the Kentish Town area is not considered an appropriate location for large floorplate offices.
- The Council considers that it is possible for development schemes in the area to include both higher density provision of industry, logistics and other employment

uses and a substantial number of new homes that reflect the indicative figure in the Plan.

- The Council considers that the site allocation is in general conformity with the wording of the London Plan as adopted in 2021.
- The allocations for the Regis Road and Murphy sites recognise the constraints on transport infrastructure and state that development must ensure the sites are designed to minimise vehicle movements and parking. The allocation for the Murphy site expects development to fully assess the transport implications of the constrained and reflect this in the type of employment uses provided on site. The Council's Kentish Town Planning Framework provides more detail on access and servicing for sites in the area. Development will also be assessed against all other relevant plan policies, including those on transport and air quality.
- Proposed allocation KT3 states that development should take into account the community's desire to maintain the view across the site towards Parliament Hill from the area adjacent to Kentish Town Station in accordance with the Kentish Town and Dartmouth Park Neighbourhood Plans. It is not considered appropriate to amend the allocation to allow for more flexibility.
- Given the current lack of detail regarding the nature and quantum of potential uses and the timescale for any development at Kentish Town Station it is not considered appropriate to specifically identify this site as an allocation in the draft new Local Plan at this stage.
- The transport section of the draft new Local Plan sets out the approach to promoting cycle parking, which seeks to ensure development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined in the London Plan.
- The draft new Local Plan expects development of sites within the area to improve the local environment including providing substantial new, welcoming and safe open space and public areas and improving connections.
- Allocations state that development must be designed to be compatible with, and facilitate, the development of neighbouring sites.
- The draft new Local Plan's approach to zero carbon development is set out in Chapter 8 - Responding to Climate Change and all development proposals will be assessed against these policies as appropriate.
- The proposed allocations for the Regis Road and Murphy sites state that development must seek to ensure that the site is designed to minimise vehicle movements and parking.
- The draft new Local Plan seeks comprehensive and co-ordinated development in the Kentish Town area and for schemes to be designed to be compatible with, and facilitate, the development of neighbouring sites. The Council recognises that development schemes for different sites will be brought forward separately.
- Significantly improving connections between the site and surrounding areas is a key objective for development in this area. The provision of new connections via bridges is considered necessary to support development on the scale anticipated and create a successful place that integrates into its surroundings. This should include new green corridor linking Kentish Town Road and Hampstead Heath

through the Murphy site, and links between that site and Regis Road. The Council recognises that the land required to deliver bridge structures is not within the ownership of a single party.

## **Policy KT2 - Regis Road Growth Area**

### **2020 Consultation Responses (Email)**

#### General

- The policy should emphasise the need to promote the creation of jobs across a range of flexible B use classes rather than focussing on the re-provision of industrial uses.
- Should state that the Regis Road Recycling and Refuse Centre should be retained or re-provided '...either on site or within the vicinity'.
- Should reflect Camden's ability to use CPO powers to enable a comprehensive redevelopment.
- The site is currently underused due to the capital expenditure required to update it for a term unknown due to the requirements for a comprehensive redevelopment.
- Should 'encourage' rather than 'consider' meanwhile uses.
- See also comments above on Policy KT1 and paragraph 8.13.

#### *Transport Matters*

- Whilst minimising vehicle movement and parking is attractive, it seems that it will be difficult to achieve if also seeking to intensify industrial uses.
- Support, especially criteria e and f. Improving connections and providing attractive and safe pedestrian and cycle routes through the area is critical.

#### *Proposed Uses*

- The site allocation should be clear that the industrial capacity is to be re-provided, about its type and quantum, and that the full range of industrial uses that support the local and CAZ economies are appropriate.
- It is unclear what land uses 'employment' includes. The potential quantum of office should be specified.
- Where industrial capacity is lost, in line with Intend to Publish London Plan Policy H5, the affordable housing threshold is 50%.

#### Infrastructure Priorities

- The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. The wastewater network capacity in this area may be unable to support the demand anticipated from this development.
- Share and support LB Camden's vision to create significant regeneration and growth benefits for the area with a focus on health and well-being. Also understand the challenges underpinning the need to find new housing in the area.
- Pleased to see the continued emphasis on employment-led development for this area. However, we are still concerned as to how the area can be developed into a mixed use site and that the operations of our site are not conducive to being in close proximity to residential properties.



- We would like to reiterate the agent of change principle in relation to any residential development built near to our Regis Road site
- Pleased to see reference to businesses located within this area and the intention to retain existing businesses. Moving our operation further out of London would be counterproductive to reducing congestion and improving air quality.
- The London Plan has an objective of no net loss of industrial land.
- Welcome the aim of improving the link between Regis Road and Kentish Town Road, physically and visually, better integrating the area with Kentish Town. Finding solutions to relieve congestion could have a truly transformative impact on the local area for both residents and businesses.
- Generally support the Council's plans for growth and development in the area.
- Do not agree with the indicative residential capacity and think the policy should be for less accommodation and more green space.

## **2021/ 22 Consultation Responses**

- Comprehensively masterplanned development is a very inflexible approach to delivering large-scale regeneration, given a comprehensive masterplan for the entire area cannot be formulated due to multiple landowner constraints. Piecemeal redevelopment proposals in advance of comprehensive redevelopment could be permitted, providing that they do not prejudice the delivery of a comprehensive scheme for the remainder of the Growth Area.
- Bridge structures to surrounding sites should not be seen as necessary in order for development to proceed at the site. This requirement could prejudice, and potentially prevent future development, even though suitable alternatives could be provided.

## **Council Response**

- The proposed uses for this site in the draft new Local Plan include industry / employment (including offices). The allocation expects development to increase the range of business premises and sectors on site.
- The proposed allocation requires development to retain or reprovide the Regis Road Recycling and Reuse Centre unless a suitable compensatory site is provided elsewhere that replaces the maximum throughput achievable at the current site and ensures the continuous availability of the service.
- Draft new Local Plan policy DM1 states that the Council will facilitate land assembly where considered appropriate. The Kentish Town Planning Framework notes that the delivery strategy for the area could include compulsory purchase should it be considered necessary. As no decision to make use of compulsory purchase powers on this site has been made, a specific reference in the allocation is not considered appropriate.
- The Council considers that the aspiration to minimise vehicle movements and parking does not conflict with the provision of industrial uses.
- The Council considers that the allocation is in general conformity with the wording of the adopted London Plan 2021.

- The allocation states that development must intensify industrial uses and provide high density employment uses, including a mix of light industrial, industrial and storage / warehouse / logistics uses and increase the range of business premises and sectors on site.
- The proposed allocation criteria provides detail on what employment uses are expected on the site.
- The site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.
- The proposed allocation expects applicants to liaise with Thames Water regarding water supply and wastewater network capacity.
- The proposed allocation states that development must ensure that non-employment uses do not compromise the operation of existing or future employment uses. Draft new Local Plan policy IE3: Industry seeks to ensure the successful co-location of uses through innovative design approaches and to avoid non-employment uses compromising the operation of businesses and in line with the 'Agent of Change' principle.
- The indicative housing capacity is considered appropriate and compatible with the requirement for development to provide substantial provision of new open space.
- It is important that piecemeal proposals for individual sites and schemes do not prejudice comprehensive redevelopment or the delivery of any of the ambitions for the area. It is therefore appropriate that the allocation resists development schemes that come forward before the area is comprehensively redeveloped that would prejudice the achievement of future aspirations for the site.
- Significantly improving connections between the site and surrounding areas is a key objective for development in this area. The provision of new connections via bridges is considered necessary to support development on the scale anticipated and create a successful place that integrates into its surroundings. This should include new green corridor linking Kentish Town Road and Hampstead Heath through the Murphy site, and links between that site and Regis Road. The Council recognises that the land required to deliver bridge structures is not within the ownership of a single party.

## **Policy KT3 - Murphy site**

### **2020 Consultation Responses (Email)**

#### General

- Policy KT3 should refer to industrial, as well as employment-led, redevelopment. (Asphaltic et al)

### Proposed Uses

- The Secretary of State's March 2020 letter to the Mayor of London and requested modifications to London Plan policies on design, industry and housing mean a rethink is required.
- See also comments above in respect of Policies KT1a and b and paragraph 8.13.
- We fully support the statements in this paragraph 8.42.
- It should be acknowledged that designated views will impact upon the massing and heights at Murphy's and other sites, which will impact upon the quantum of floorspace and land uses delivered. Should allow for more flexibility in the way these views are interpreted to allow for development to come forward to meet wider aspirations and priorities.
- The 'proposed use' section of the key information box should include appropriate retail uses
- Encourage rewording Part G of Policy KT3 to require "an appropriate" amount of new public open space as opposed to "substantial".
- Potential changes to London Plan policies should be kept under review as this Site Allocations Document progresses to ensure that the policies are aligned, particularly those relating to industrial uses.
- Recognise the aspiration for a comprehensive masterplan to be delivered across the Murphy's Yard and Regis Road areas, but the delivery of the Murphy site should not be constrained by progress on any land outside its ownership.
- The site is a designated Locally Significant Industrial Site (LSIS) where the priority land use is industrial alongside other commercial and employment generating uses. The functionality of industrial uses should not be hindered by a requirement to co-locate other uses.
- Remain concerned about the primacy of housing delivery set out in the draft Site Allocations Document, despite the LSIS designation, and this should be reconsidered. Residential use, whilst a priority for the borough more widely, must not take precedence over the delivery of industrial and other commercial uses.
- Encourage LBC to recognise the significant placemaking benefits of light industrial floorspace as opposed to more traditional industrial, storage and warehousing uses. We therefore welcome paragraph 8.41.
- Encourage LBC to recognise that the Murphy site is suitable for a range uses, including office, food and beverage, other commercial uses, and health care uses.
- Do not consider that Makers Lane should be considered as a key principle for development at the Murphy's Yard site.
- Support the aspiration for increased connectivity across the site. (Folgate Estates)
- It must be recognised that the land required to deliver bridge structures is not within our ownership and the ability to deliver them will rely on discussions with third parties and feasibility studies and cannot be guaranteed. Bridge structures should not be seen as necessary in order for development to proceed as suitable alternatives could be provided.
- Support the view that the heritage of the area should be celebrated and retained where possible.
- The policy should identify this site as Locally Significant Industrial Site.

- It is unclear what land uses 'employment' includes. The potential quantum of office should be specified.
- The policy should be clear on the type and quantum of industrial floorspace to be provided.

#### Infrastructure Priorities

- The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Please liaise with Thames Water.

#### Transport

- The plan could consider other initiatives to improve cycling within Kentish Town to promote active travel.
- Support, especially (c-f), but paragraph 8.44 should state that new connections must include a cycle route as well as a pedestrian route.
- We support the proposal to investigate new access to the site. However, we believe any access on Gordon House Road should be limited to pedestrians and cyclists only.
- This is an industrial site with a requirement to provide a significant amount of industrial floorspace through any redevelopment; therefore a certain amount of vehicle movement and parking will be required on site for the industrial uses to be functional and successful. It is appropriate that this policy is re-worded to allow for more flexibility in terms of minimising vehicle movements and parking and not conflict with the aspiration to deliver industrial uses on site.

### **2021/ 22 Consultation Responses**

- Urge that that 750 homes number is retained and that it is not increased to allow a larger number of houses on the site.
- Request that the policy specifically recognises the potential for research and development uses and healthcare uses within use class E(e) and sui generis to be located at the site.
- Provisions within policy E4 of the adopted London Plan should be recognised in the policy.
- The policy should note that various types of open spaces, include both green spaces and spaces with hard landscaping, will contribute to the public open space requirements through the site's redevelopment.
- It should be acknowledged that designated views will impact upon massing and heights at the Murphy's site and therefore the quantum of floorspace and land uses delivered. We encourage LBC to allow for more flexibility in the way these views are interpreted.
- The policy should recognise that tall buildings are required to meet the aspirations for at least 750 homes and the intensification of industrial uses. The SALP should explicitly recognise Murphy's Yard as a location suitable for tall buildings.

- Strongly object to the requirement that development “must” provide cantilevered access, which is not required to make the development of the site acceptable in planning terms.
- The land required to deliver the aspiration for links to other sites is not entirely within Folgate Estates’ ownership and provision cannot be guaranteed. Suitable access into the site from Kentish Town can be provided as an alternative, specifically access to the site from Greenwood Place.

### **Council Response**

- The Council considers that the site allocation is in general conformity with the wording of the London Plan as adopted in 2021.
- The proposed allocation in the draft new Local Plan states that development should take into account the community's desire to maintain the view across the site towards Parliament Hill from the area adjacent to Kentish Town Station in accordance with the Kentish Town and Dartmouth Park Neighbourhood Plans. It is not considered appropriate to amend the allocation to allow for more flexibility.
- Any provision of retail on the site should be of a scale appropriate to serving the needs of those living in, working in or visiting the site and not compete with or cause harm to, the vitality and viability of existing centres. Therefore it is not considered appropriate to make a specific reference to retail as a proposed use.
- Given the size of the site, the scale of open space provision in any redevelopment is expected to be of a considerable size (i.e. substantial). It is not considered necessary or appropriate to refer to various types of open space in individual site allocations. The Local Plan policy on open space sets out the Council’s detailed approach to this matter.
- The proposed allocation expects development be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular Regis Road. The Council recognises that development schemes for different sites will be brought forward separately.
- The proposed allocation does not give primacy to residential uses. It refers to comprehensive employment-led development taking the opportunity for significant intensification of industrial and other employment uses alongside a substantial number of homes, open space and community uses. It also states that redevelopment should ensure that non-employment uses do not compromise the operation of businesses.
- The proposed allocation recognises that the provision of some office space, retail and may be considered appropriate as part of the development of the area. However, the scale of provision of these uses and not compete with or harm existing centres and avoid changing the character of the site.
- The Council considers that it is important that development of the Murphy site facilitates a new north-south pedestrian and cycle route from Kentish Town to Highgate Road that passes through the site.
- A new green corridor linking Kentish Town Road and Hampstead Heath through the Murphy site is a key objective for its redevelopment. A connection cantilevered over the railway line between the site and Kentish Town Road railway bridge is considered to be the best way of providing this.

- The Council recognises that the land required to deliver bridge structures is not within the ownership of a single party.
- The proposed allocation recognises that the site forms part of the Kentish Town Industry Area, which is considered to be a Locally Significant Industrial Site (LSIS) in terms of the London Plan.
- The proposed allocation criteria provides detail on what employment uses are expected on the site
- The site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.
- It is proposed the allocation expects applicants to liaise with Thames Water regarding water supply and wastewater network capacity.
- The proposed allocation refers to the provision of cycling links through the site.
- The proposed allocation expects development schemes to fully assess the transport implications of the constrained access to the site; develop a transport strategy to mitigate the site-specific constraints; deliver significant improvements to access into the site and connections to surrounding areas; and explore new access points, freight consolidation, servicing, and limiting traffic.
- The Council considers that the aspiration to minimise vehicle movements and parking does not conflict with the provision of industrial uses.
- It is proposed that the indicative capacity figure of 750 homes is retained.
- Research and development is an employment use and could therefore be a suitable use as part of employment provision on the site. This would need to complement the strengths of the local economy and the Council would likely not support a scheme proposing a substantial amount of R&D floorspace without evidence of demand at this location. We therefore do not consider it necessary or appropriate for the allocation to include a specific reference to such uses.
- The site has poor connections and links to surrounding areas and the provision of new connections via bridges is considered necessary to support development on the scale anticipated and create a successful place that integrates into its surroundings. A new green corridor linking Kentish Town Road and Hampstead Heath through the site is a key objective for its development. A connection cantilevered over the railway line between the site and Kentish Town Road railway bridge is considered to be the best way of providing this.

## **Policy KT4 - Kentish Town Police Station**

### **2020 Consultation Responses (Email)**

- Support, especially (b). Very welcome proposal to link Holmes Road and Regis Road.
- We do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development.

## **2021/ 22 Consultation Responses**

No further responses were received

## **Council Response**

Comments noted.

## **Policy KT5 - 369-377 Kentish Town Road ('Car wash site')**

### **2020 Consultation Responses (Email)**

- Support, especially (b). A pedestrian and cycle link from Kentish Town Road is a key part of the adjacent Murphy's site development and must be safeguarded.
- This site is industrial in nature. Its industrial capacity could be re-provided on Site Allocations KT2 and/or KT3.
- Any proposals which require the relocation of bus infrastructure (including bus shelters) will need to be done in consultation and agreement with TfL. We do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development.

### **2021/ 22 Consultation Responses (Email)**

- Bridge structures to surrounding sites should not be seen as necessary in order for development to proceed at the site and such a requirement could prejudice, and potentially prevent future development, even though suitable alternatives could be provided.

## **Council Response**

- Allocations KT2 and KT3 expect intensification of industrial provision on those sites. These can reprovide capacity from site KT5.
- The Council considers that it important that development on this site facilitates connections to the Murphy site, for example a walkway cantilevered over the adjacent railway cutting and contribute towards creating a welcoming entrance to that key site.
- Other comments are noted.

## **Policy KT6 - Kentish Town Fire Station**

### **2020 Consultation Responses (Email)**

- We do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development.

## **2021/ 22 Consultation Responses**

No further responses were received

## **Council Response**

Comment noted.

## **Policy KT7 - Highgate Centre, Highgate Road**

### **2020 Consultation Responses (Email)**

- We do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development.

## **2021/ 22 Consultation Responses**

- Support Site Allocation KT7 in principle to ensure retention of the existing Shurgard operation.
- Any future residential development of the Highgate Centre, in line with proposed Site Allocation KT7, should prevent sterilising development at the Shurgard site for intensified self-storage use in accordance with the Local Plan and London Plan.
- Add reference to ensuring there is no impact on the operation of surrounding businesses in accordance with the London Plan 'Agent of Change' policy.

## **Council Response**

- Planning permission covering the Highgate Centre and Greenwood Centre is being implemented. Therefore, although the site allocation is being retained in the draft Local Plan pending completion of the scheme, it is proposed that no detailed development criteria is set out for this site.

## **Section 9: West Hampstead Interchange**

### **Policy WHI1 - West Hampstead Interchange Area**

#### **2020 Consultation Responses (Email)**

##### Area boundary

- Area boundary should include properties on Broadhurst Gardens, 14 Blackburn Road and Finchley Road underground station.
- Additional land parcels could be included in the overall area subject to confirmation of no ongoing operational requirements.
- Granny Dripping Steps and Finchley Road station should be included in the area



- Unclear why the properties located between Finchley Road station and the O2 have not been included in the area boundary, particularly given the poor pedestrian environment in this area.

#### Proposed uses

- Support the allocation as consider the area suitable to deliver a significant increase in number of residential homes, employment and town centre uses including retail, health community facilities and open space.
- More emphasis should be given to local employment provision including workshops and offices tech hubs over housing.
- Proposed uses should include flexible town centre uses.
- There does not appear to be any reference to the development potential for the low rise retail and commercial buildings on the southern side of Blackburn Road. This could be a key enabler for the station improvements.

#### Housing capacity

- Housing capacity is considered to be too low given the areas high accessibility. It should be increased to a minimum of 5000 new homes.
- Based on the London Plan density matrix the housing capacity should be increased to 1330 – 4560 homes.

#### Type of housing provision

- Encouragement of a mixture of homes to include elderly, student and hotel use should be included rather than just permanent self contained homes.
- Support the commitment to 'significant proportion of family homes' and feel it should be applied across all tenures of home.
- Object to the priority given to family homes and any provision should be in accordance with Local Plan policies.
- As there is an oversupply of one bedroom units in the area the policy should require the majority of homes to have two or more bedrooms.
- Housing should be predominantly affordable housing and restrictions should be placed on overseas investment.
- Area is more suitable for high density urban apartments rather than family homes given its location in close proximity to railway lines and so reference to significant proportion of family homes should be removed.

#### Public realm / transport matters

- Support the creation of step free access and feasibility work undertaken also identified potential capacity enhancement measures and options for commercial development above and around an extended ticket hall. Funding is needed to develop this work and so the policy wording should be strengthened to make clear the need for further design work as well as implementation.
- Public realm improvements around Finchley Road station should be included in the policy.
- Reference to setting back buildings on Billy Fury Way to create natural surveillance should be removed and changed to exploring design options.

- Policy should allow for greater flexibility of the location of access routes.
- Should include a requirement to not allow a through vehicular route from West End Lane to Finchley Road.
- More emphasis is needed in the policy on finding solutions to transport congestion. Transport infrastructure must be improved to cope with the increased population.
- Support the public realm improvement references but feel that should more explicitly mention the opportunities to improve West End Lane and Finchley Road for pedestrians and cyclists.
- Policy should include emphasis on wider pavements.
- Improvements to the public realm and street environment should be across the entirety of West Hampstead. The rail side land could be improved as open space.
- Welcome the reference in supporting text to the need to explore step free access at Finchley Road station. But wish to highlight any works would be difficult to implement owing to the curved nature of the station's platforms and high level of disruption that would be caused to the Jubilee Line.
- Support improving step free access to West Hampstead Underground.
- An improved pedestrian crossing from the underground to West Hampstead Square should be included.

#### Design matters

- Should include recognition of the ambitions to include the O2 centre itself as part of a comprehensive proposal if it helps achieve higher quality redevelopment. (Landsec)
- Architectural emphasis should be on small blocks with green walls, roofs and sustainable measures.
- Improvements to north south travel routes should also be included. Options such as a tunnel/ bridge from Iverson Road to Lowfield Road should be considered along with improvements to the Granny Dripping Steps and a possible further rail crossing near Fairhazel Gardens.

#### Infrastructure provision

- Provision of step free access should be prioritised at West Hampstead not Finchley Road underground.
- Support the reference to the need for a new health and well-being centre.
- Infrastructure improvements should include wider pavements, green spaces, additional Doctors surgery and water infrastructure.
- Any improvements to Blackburn Road should allow for the continued safeguarding of existing bus facilities, namely, two separate bus stops, four stands which can be independently used for 12m buses and drivers toilets within two minute walk of the stand and turning point.

### **2020 Consultation Responses (Commonplace)**

#### What development priorities do you think the policy should focus on?

18 people responded to this question raising the following points:

- General look and feel of the place/ improving how people move around/ environmental improvements (10 responses)
- Area wide infrastructure priorities (9 responses)
- Getting developers to coordinate proposals (8 responses)
- Making efficient use of land (4 responses)

What changes do you think need to be made to make the policy more effective?

15 people responded to this question and the comments are summarised below:

- Step free interchange should be a prerequisite for any further development (3 responses)
- Streets need to be safer (3 responses)
- No more new homes
- Social housing should be kept within the development area
- Better lighting without light pollution
- More green spaces
- New school places needed
- Improve traffic management
- Design needs to respect character of area
- Development should be coordinated

Which types of infrastructure needs to be prioritised?

18 people responded to this question identifying the following priorities:

- Public transport and walking and cycling (12 responses each)
- Open space (11 responses)
- Health and well-being (9 responses)
- Facilities for elderly (6 response)
- Facilities for young people (5 responses)
- Education (3 responses)
- Sports and leisure (2 responses)

Specific infrastructure improvement suggestions included :

- Underground/ linked interchange for all 3 stations (5 responses)
- Step free access at West Hampstead Underground (3 responses)
- Doctors surgery (2 responses)
- Large quantity of open space even if means towers
- Improved open space / greenery
- Improve Granny Dripping Steps
- Improved public realm
- New school
- Improved lighting without pollution

## **2021/22 Consultation Responses (Email)**

- The area boundary should be extended to include 14 Blackburn Road to support a comprehensive approach to development in the area and to help facilitate step free access to West Hampstead Station.
- Policy should include reference to 'and/ or safeguarding of land' to assist with step free access into West Hampstead tube station.
- Policy should stipulate the need for design codes to be developed for all sites before planning applications can be considered.
- Policy should include:
  - building heights compliant with National model Design Code
  - space standards consistent with reasonable living and working from home
  - quantum of industrial capacity to be redeveloped, reprovided and office space to be provided
  - quantum of green spaces to act as SUDS
  - building designs to complement and enhance the surrounding Edwardian / Victorian Conservation areas
  - presumption in favour of development which commits to the Full Award (Excellent) accreditation of the Building with Nature Standard. (Building heights should be more prescriptive, no more than 5-7 storeys and density no more than 60 – 12- dwellings per hectare to respect the adjacent conservation areas.
- Development should be guided more by the award winning Alexandra & Ainsworth estate, which provides family friendly units with green open spaces and a low density of around 8- dwellings / hectare.
- Site is well suited for new homes and employment which should include start up accommodation and home / workspace.
- The east west route across the site should correspond with that in the adopted SPD.
- Some short term car parking for shoppers should be retained.
- The substantial public benefits of redevelopment should be highlighted.
- Reference should be included to the adopted SPD for 'West End Lane to Finchley Road'.
- Improving the interchange environment between the stations and wider area should be highlighted as a key issue.
- The infrastructure priorities should include lifts at both Finchley Road tube and Frognaal Overground stations.
- Development must provide natural green space and green infrastructure to help the movement or dispersal of wildlife.

**Please see Appendix 1 for a summary of the Commonplace responses received in 2022**

## **Council Response**

- The proposed draft new Local Plan does not include an allocation for the West Hampstead Interchange Growth Area in the form included in the Site Allocations

Local Plan. The Council's approach to this area now is set out in Policy W1 – West Camden and individual site allocations.

- The boundary of the site allocation for the O2 car park (WHI2) has been amended to include the O2 centre itself, 14 Blackburn Road and Granny Dripping Steps to reflect the approved planning permission and to allow for a more comprehensive approach to the area.
- The indicative housing capacity figures in the individual site allocations have been updated in the draft new Local Plan.
- Individual site allocations refer to the preferred housing mix, where relevant, and draft Local Plan policies H6 - Housing choice and mix, H7 - Large and small homes, and H4 - Maximising the supply of affordable housing will apply to all planning applications for the allocated sites and elsewhere.
- The requirement for affordable workspace is set out in specific site allocations and in the new draft Local Plan Policy IE5 - Affordable and specialist workspace.
- It is not feasible to restrict overseas investment in residential properties through site allocations.
- Individual allocations in the draft new Local Plan have a 'Infrastructure Requirement' section setting out the public realm improvement and infrastructure requirements for particular sites. Area wide infrastructure requirements are set out in the policy W1 - West Camden and borough wide requirements are set out Appendix 1 of the Plan.
- The allocation of the O2 site includes the requirement for contributions for step free access and public realm improvements at both West Hampstead and Finchley Road tube stations. These are current priorities for step free access.
- The allocation of the O2 site and Policy W1 - West Camden require the provision of a health centre and community facilities, wider pavements, bus stop improvements and new public open space.
- Individual allocations identify sites considered by the Camden Building Height Study as a location where tall buildings may be an appropriate form of development.
- Individual site allocations and draft Plan policy W1 - West Camden require development to improve biodiversity and ecological connectivity and deliver urban green measures in accordance with Policy NE2 - Biodiversity.

## **Policy WHI2 – O2 Centre, carpark and car showroom sites**

### **2020 Consultation Responses (Email)**

#### General

- Support the policy.
- Site boundary should be amended to include Finchley Road underground station.
- Support a cohesive masterplan approach for the site so long as engagement with relevant landowners and key stakeholders does not stifle redevelopment.
- Include the potential to remove the O2 centre from the policy if this delivers higher quality redevelopment.

- Landowners of the car showrooms confirmed their continuing interest in the development potential of these sites.
- Buildings should be no more than 5 storeys.
- Reference should be included to in appropriate circumstances, including where development is being stifled by different land ownerships, that the council would consider the use of statutory powers, such as compulsory purchase and the over-riding of easements and other rights, where these may be necessary to deliver more publicly beneficial development.

#### Residential capacity/ type of residential

- Housing capacity should be increased to 2000 homes.
- Object to the proposed 950 new homes capacity. Inappropriate density of development that cannot be achieved without tall buildings or smaller unit sizes.
- Priority should be given to building of family homes across all tenures.
- The housing capacity should be increased. The London Plan density matrix gives a range of 736 – 1525 homes so should be increased.
- The housing capacity should be reduced and workshop and office floor space increased. Housing allocation should be predominantly affordable housing and prioritised for local people

#### Public realm

- Remove reference to Blackburn Road from access requirements to allow greater flexibility should an alternative access be possible.
- Policy should be clearer that no vehicular route will be allowed connecting West End Lane and Finchley Road.
- Improvements to the Granny Dripping Steps should be included.
- Support the public realm and access improvements proposed.
- Support increasing pedestrian and cyclist links between Finchley Road and West End Lane and ensuring these are not used as a through route for vehicular traffic.
- Tracksides should be cleaned up and where possible incorporated into communal space.
- Clarity on the car parking is required.
- Clarity on the use of parking spaces in off peak times is required.

#### Infrastructure

- The development offers a unique opportunity to create a north eastern entrance to West Hampstead Underground station from Blackburn Road.
- Should include reference to removing all or at least a significant amount of car parking.
- The provision of a new health and well-being centre should be 'if demand exists'.
- Policy should ensure developers work together and improve the interchange, Granny Dripping Steps and access and safety at Finchley Road underground station.
- Green spaces, green buildings and renewable energy generation should be provided.

- Specific requirement for a GP surgery should be included.
- Support the identification of this site for a new health and well-being hub. If it is not possible WHI5b 156 West End Lane is a possible location.
- Community facilities for young people and health provision should be included. (CRASH)
- The scale of development is likely to require upgrades of water supply network infrastructure, but at this stage do not have concerns about wastewater networks.

### **2020 Consultation Responses (Commonplace)**

- 17 responses did not agree with the proposed policy uses, 10 supported the uses and 2 were unsure.
- 24 responses did not agree with the residential capacity, 3 agreed and 3 were unsure.

### **What changes would you make to the policy to be more effective?**

32 people responded to this question making the following comments:

- Reduce the density as amenity and infrastructure unable to support this increase (11 responses)
- 950 homes is a massive overdevelopment (3 responses)
- No more homes are needed (2 responses)
- Need additional infrastructure before more homes are built (3 responses)
- A greater number of homes could be built by developing quality build towers structures, upper floors for sale, lower floors provide smaller affordable housing with 'village areas'
- Require a mixture of property types to include houses and flats
- Ensure housing is affordable, for local people and not for sale to investors (2 responses)
- Number of affordable homes to be provided should be stated (2 Responses)
- Retain car parking (2 responses)
- Set acceptable building heights. 5 storeys maximum
- Include accessible open/ green space (2 responses)
- O2 centre itself should be included in the redevelopment (2 responses)
- Support the proposal
- More coordination by developers.

### **Do you have any other comments:**

21 people responded to this question making the following comments:

- Scheme should be linked to improvements to West Hampstead and Finchley Road tube stations (3 responses)
- Vehicular access from Blackburn Road is not possible, only pedestrian and cycle
- Permanent retention of a walkway from West End Lane and Finchley Road was a commitment when the O2 was built
- 950 homes is too many for the area (5 responses)
- Camden's housing needs mean that the amount of homes on this site should be trebled.

- Social housing should be at least 50% (2 responses)
- Stop building for speculators / investors (2 responses)
- Local residents want open space (2 responses)
- GP surgery should be guaranteed
- Infrastructure cannot cope (2 responses)
- Loss of car parking will impact food shoppers
- Height should be no more than 5 storeys
- Rainwater should be collected.

## **2021/22 Consultation Responses (Email)**

### Proposed density

- Object to the density of development.
- Are this number of flats needed or desirable as they have no or limited open space? Covid has changed people's views on what is important.
- Each site within the masterplan area should be required to maximise its development in terms of siting, scale and massing.
- Evidence supporting the proposed 950 quantum should be provided.
- Proposed density does not comply with national guidelines. Proposed density will put additional stress on already overstretched community facilities and infrastructure.
- Proposed density should be increased to 1800 based on detailed masterplan work.
- Proposed density is in conflict with national design code, guidance from London Assembly and Fortune Green and West Hampstead Neighbourhood Plan.

### Proposed uses

- Policy should specifically refer to the car showrooms in the 'complementary commercial uses' as they are commercially bound to continue to operate over the short to medium period.
- Affordable housing should be social housing designed for nurses, police, public transport workers so genuinely affordable.
- Needs to be a focus on larger family friendly homes to counter the preponderance of studio, 1 and 2 beds already in the area.
- A new recreation ground / leisure centre should be considered as well as space for community events.
- Additional green space is required as the site is in an area with the highest Green Space Deprivation score.
- Policy should specify the quantum of natural green space (as distinct from open space), SUDS, trees and hedges to be provided.
- Quantum of industrial and employment space should be specified as well as office.
- Developer should be required to reprovide large supermarket, large bookstore, selection of cafes/ restaurants, multi screen cinema, gym / health centre and several community / children's activity uses.



- Large hardware store should be provided.
- There should be no net loss of local employment opportunities.
- Policy should recognise the possibility of including the redevelopment of the O2 centre where it could deliver a higher quality comprehensive redevelopment.
- Whilst a new health centre is included in the proposal the demand for such a use has not been identified/confirmed.

#### Loss of facilities

- Loss of the supermarket will detrimentally impact the lives of the elderly.
- The large supermarket and car parking should be retained.
- Object as removes useful facilities in the O2.

#### Proposed height

- Tall buildings are totally out of character for this area.
- Building heights should be limited due to location adjacent to three conservation areas.
- Development should be no more than 5-7 stories.
- Tall towers will dominate the skyline for miles around.
- The allocation should acknowledge the appropriateness of taller buildings in this location.
- Nowhere is West Hampstead is suitable for tall buildings and consideration should be given to recent London Assembly assessment of social and environmental effects of tall buildings research.
- West Hampstead is identified as a growth area and should therefore be identified as an areas suitable for tall buildings as required by the London Plan and this should be recognised specifically in the policy wording.
- High rises will cause harm to the liveability of the area, harms the views of the Conservation areas, damage air quality and quality of life.
- Conflicts with the aim of development of a human scale which the Neighbourhood Plan requires.
- Policy should specify a height compliant with National Model Design Code.
- This type of development is not suitable for this low to mid rise area. It will result in the effect of one huge wall from east to west.
- Has a wind tunnel survey been undertaken to assess impact of the tall buildings?

#### Transport and car parking matters

- Development would create excessive traffic, pollution and congestion on Finchley Road.
- Car free developments are unenforceable and new residents will park in existing residential areas.
- Car free development is not acceptable as parking is needed for heavily pregnant people, those with young children, elderly and disabled non residents.
- More traffic in area will cause worse air quality.
- Car parking for a supermarket should be retained and for new residents.

- Short term parking for the supermarket should be provided as specified in the Framework.
- Road to give access to delivery vehicles are essential if you want people to live car free.
- Support the key principle of creating an open and legible, vehicle free pedestrian and cycling route between Finchley Road and West Hampstead in principle, but do not support the indicative route straight across the site as being the most desirable, due to its impact on the car showrooms and does not recognise the potential for servicing, impact on potential phasing and ultimately hampers the deliverability of the car showrooms as part of a wider development.
- Indicative pedestrian / cycle route shown on Figure 9.2 should be updated to reflect the same route as shown in the adopted SPD.
- Policy wording should be amended to remove reference to the pedestrian / cycle route being central and replace with reference to a convenient, direct, safe and accessible route.
- Reference should be made to welcoming entrance to the site removing the specific reference to Blackburn Road.
- Development should be car free in line with Camden's policies with the exception of blue badge holders.

### Infrastructure

- Support the phased approach along current ownership boundaries, however the policy should explicitly refer to the need for the necessary collaboration between landowners to ensure the cost of infrastructure and public amenity is equitably apportioned across the whole masterplan site.
- A new step free access to the West Hampstead tube station is essential from within the development.
- Transport infrastructure should be provided before any new residents move in.
- Transport infrastructure capacity expansion should also be provided at Finchley Road.
- Granny Dripping Steps should be improved and could be used to allow access to the station hence improving access from Broadhurst Gardens also.
- TfL should agree to increasing peak trains and buses.
- Not enough green space is being provided.
- Lots of greenery should be provided which is good for bird and wildlife and can assist in reducing global warming.
- Trees, green space with seating areas
- The proposed linear park is insufficient for number of residents and will not be safe to use at night.
- This number of homes would result in enormous problems with water run-off and sewerage.
- Both primary and non-fee secondary schools are already full and so additional places should be provided.
- Will lead to detrimental impact on doctors, hospitals and community uses and so additional facilities should be provided.

- Transport services are already overloaded.

#### Sustainability matters

- The proposed developer needs to do and say more about the environmental goals and making the development as energy efficient as possible.
- O2 centre should not be demolished due to high carbon costs.
- Policy should require a presumption in favour of development that commits to the full award (excellent) accreditation of building with nature standard and provide for a rain garden at the centre of the site.

#### General

- 14 Blackburn Road should be included in the development area.
- Space standards should be consistent with reasonable living and working from home conditions.
- Should use a design code before a planning application is considered.
- Support the general principles of the policy which promotes the development of the car showrooms as part of a wider masterplan but are concerned about the overly prescriptive nature of the allocation and how it will impact on delivery in reality.
- Policy should require the development to be delivered in a comprehensive manner.
- Reference should be included to in appropriate circumstances, including where development is being stifled or delayed by different land ownerships, that the council would consider the use of statutory powers, such as compulsory purchase and the over-riding of easements and other rights, where these may be necessary to deliver more publicly beneficial development.
- Design should be more sympathetic to the Victorian or Edwardian designs in the area.
- Public consultation of what is being proposed should be better as many people are unaware of the proposed scale of development and so do not comment.
- Question whether the police been consulted and inputted.
- Hope that this development is not a faceless bit of urban fill but an internationally admired development that sets new standards for our city, embracing new architectural ambitions.
- Do not want to create a ghetto in the area.
- It would be helpful to map the number of dwellings and dwellings per hectare for each individual site within the area.

#### **Council Response**

- The allocation in the draft new Local Plan has been amended to reflect the approved planning permission for the site.
- The allocation supports comprehensive rather than piecemeal proposals for the site in accordance with the masterplan process informed by the West End Lane to Finchley Road planning framework.

- Draft new Local Plan policy DM1 states that the Council will facilitate land assembly where considered appropriate. The West End Lane to Finchley Road planning framework notes that the delivery strategy for the area could include compulsory purchase should it be considered necessary. As no decision to make use of compulsory purchase powers on this site has been made, a specific reference in the allocation is not considered appropriate.
- The boundary of the site has been amended to include the O2 centre itself, 14 Blackburn Road and Granny Dripping Steps to reflect the Council's Finchley Road to West End Lane supplementary planning document and the planning permission.
- The indicative site capacity reflects the approved planning permission.
- The allocation is for a residential-led scheme, providing a substantial number of permanent self contained homes, affordable homes and a mix of types, sizes and tenures, including a significant proportion of homes for families, in accordance with the housing policies of the Local Plan.
- The Allocated uses and requirements have been amended to include leisure uses, including a cinema.
- The allocation requires the provision of a new NHS health centre.
- The site allocations set out the Council's overall development principles for particular sites. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.
- The Camden Building Height Study considered that this site is a location where tall buildings may be an appropriate form of development and this is recognised in the site allocation.
- The employment floorspace requirement has been amended to include the requirement for the provision for a range of businesses and affordable workspace provision.
- The public realm improvement requirements have been amended to include specific reference to Billy Fury Way and Granny Dripping Steps and other specific area improvements.
- The possible locations of proposed routes and reference to the need for a central route are not included in the draft new Local Plan. This should be considered through detailed design work.
- The requirement to remove existing car parking provision, except for essential users, has been strengthened as a requirement in the updated allocation to reflect the planning permission and approach in the draft Local Plan policy T5 - Parking and car-free development.
- The Allocation requires contributions towards delivery of a new link / step free access into West Hampstead and / or Finchley Road underground stations and contributions towards capacity upgrades.

- The Allocation has been amended to require the provision of infrastructure for supporting local energy generation and potential connections to existing or future networks.
- Biodiversity improvements have been included as a specific requirement.

## **Policy WHI3 – 13 Blackburn Road**

### **2020 Consultation Responses (Email)**

- Site area should be extended to include 11 Blackburn Road with a capacity for 80 homes.
- Site boundary could include all Blackburn Road properties and some on West End Lane as a single site to assist with a coordinated approach with WHI2 policy.
- Co-location with industrial uses should be sought on this site as it is an identified industrial site.
- Uses should include retail and commercial, which would help improve the streetscape.
- The capacity of adjacent and nearby sites for office use should be assessed before allocating this non town centre site for office use.
- Maximising the pavement width in Blackburn Road should be included.
- Clarity is needed on the provision of on site car parking.
- Clarification on the size of housing and proportion of social and genuinely affordable housing is needed.
- No infrastructure concerns regarding water supply or waste water are envisaged.

### **2020 Consultation Responses (Commonplace)**

9 people responded to the questions regarding uses and residential capacity.

- 5 responses did not agree with the proposed policy use; 4 supported the uses
- 6 responses did not agree with the residential capacity; 2 did agree and 1 was unsure.

#### What changes are needed to make the policy more effective?

6 people responded making the following comments:

- Footbridge linking Blackburn Road to the other side needs cleaning up
- Residential capacity is too much. No new homes are needed
- Height needs to address the height of the student block / be no higher (2 responses)
- Impact of construction traffic must be carefully managed
- Social housing requirement should be specified
- No residential should be allowed; commercial or leisure would be ideal
- New homes should be for sale to owner occupiers only, not speculative
- Blackburn Road should be considered holistically.

## **2021/22 Consultation Responses**

No further responses were received

### **Council response**

- The site area of the allocation has not been extended in the draft new Local Plan as planning permission has been granted for this site. No. 11 Blackburn Road has been included as a separate site allocation and both allocations include reference to taking development planned on adjacent sites into consideration to encourage a coordinated approach.
- The allocated uses include commercial uses and a requirement for an active frontage on Blackburn Road.
- The existing use of part of the site is office use therefore re-provision is considered acceptable.
- The site is not a designated industrial site.
- The indicative capacity is based on the approved planning permission.
- Reference to wider footpaths on Blackburn Road has been included.
- No on-site parking is envisaged in accordance with draft new Local Plan policy T5 - Parking and car-free development
- The allocation seeks a mixture of unit sizes in the self contained and affordable homes, including larger sized units.

## **Policy WHI4 – 188 -190 Iverson Road**

### **2020 Consultation Responses (Email)**

- Support the identification of light industrial use on this site but should specify the quantum to be re-provided.
- The capacity of adjacent and nearby sites for office use should be assessed before allocating this non town centre site for office use.
- Do not support the residential capacity of 15 and feel that it should be increased to 43 based on density of adjacent sites.
- Clarification on the size of housing and proportion of social and genuinely affordable housing is needed.
- Housing should prioritise self contained homes for families and require a large majority to have two or more bedrooms.
- Site should not be exempted from elements of WHI1 policy.
- Support this policy.
- No infrastructure concerns regarding water supply or waste water are envisaged.
- Clarity is needed on the provision of on-site car parking.

### **2020 Consultation Responses (Commonplace)**

8 People responded to the questions regarding uses and residential capacity.

- 5 responses agree with the proposed policy uses; 3 did not
- 4 responses agree with the residential capacity; 4 did not agree

### What changes are needed to make the policy more effective?

6 people responded making the following comments:

- Should be retained as light industrial
- No housing and retain as light industrial as inadequate infrastructure for more homes
- Housing is unacceptable within an industrial site
- Area is overcrowded already
- Would result in increased parking pressure on Iverson Road
- Social housing requirement should be specified
- Support redevelopment as site is currently underused and could retain / support business use and jobs
- Design/ massing should blend with existing character of Iverson Road

### **2021/22 Consultation Responses**

No further responses were received

### **Council Response**

- The Site Allocation set out the Council's overall development principles for this site. It is not considered necessary or appropriate to set out a detailed quantum of all uses on large mixed use development sites. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan
- There is an existing lawful office use on part the site, therefore the site is considered appropriate for office use
- The indicative housing capacity is based on an urban design assessment including site context and constraints.
- The site is considered to be suitable for a mixed use development including residential, which will contribute to meeting the borough's housing need.
- The appropriate housing mix will be established through the planning application process in accordance with relevant Local Plan policies.
- The allocation has been amended to require that the continued and future use of the site for commercial purposes, particularly commercial vehicular access are not detrimentally affected by a mixed used development

## **Policy WHI5 - Other development sites in the West Hampstead Interchange Area**

### **2020 Consultation Responses (Email)**

- Sites and table references for WHI5 a) and b) are inconsistent and need to be amended.

- Object to the requirement for 'equivalent housing floor space' and would like hotel, housing, class A uses, offices and Class D1 and D2 included to allow greater flexibility.
- 153 – 163 Broadhurst Gardens, ENO site and 14 Blackburn Road could be included in here to ensure that Policy WHI1 general policy applies.
- 11 Blackburn Road should be included as a site here with a capacity for 30 homes.

## **2020 Consultation Responses (Commonplace)**

WHI5 b – 156 West End Lane

- Too many homes and should be affordable
- Need to address infrastructure problems

## **2021/22 Consultation Responses**

No further responses were received

### **Council Response**

- WHI5b - 156 West End Lane is not included in the draft new Local Plan as a site allocation as development of the site is substantially complete.
- The allocated uses for WHI5 – Land at Midland Crescent/ Finchley Road have been amended to include 'town centre uses'.
- The reference to provision of 'equivalent residential floorspace' has been retained reflecting that housing is the priority use in the Local Plan.
- WHI1 - West Hampstead Interchange is no longer included as a specific site allocation in the draft Local Plan. 14 Blackburn Road has been included within allocation WHI2 and 11 Blackburn Road has been included as a separate site allocation.

## **Section 10 - Individual Development Sites**

### **Policy IDS1 – Network Building and 88 Whitfield Street**

#### **2020 Consultation Responses (Email)**

- We support this policy, especially clauses (e) and (f). Howland Street is a major cycle route and needs improvement.
- We welcome the inclusion of this site along with IDS2 Former Tottenham Mews Day Hospital. Our intention is to bring forward separate applications for these sites linked by a s106 agreement. We support office and retail-led development of this site. The site is located in the Knowledge Quarter Innovation District, but we note that the proposed uses in this allocation do not include "knowledge quarter uses".
- We recognise that existing residential properties will need to be replaced but consider that they could more appropriately be replaced at Tottenham Mews. The height thresholds of the designated strategic view from Parliament Hill limit the opportunities to provide additional massing at the Network Building to cater for



residential and office expansion. A wholly commercial scheme on the Network Site is essential in a competitive environment to attracting the right type of commercial occupiers.

- Relocating the residential uses on Tottenham Mews will:
  - provide the most effective and efficient use of land;
  - enable the creation of 973 sqm additional office space at the Network Building, equivalent to 64 additional jobs;
  - enable large, clear and efficient floorplates that meet BCO guidelines and modern occupier needs in terms of floorplate depths, access to daylight, optimised core to facade distances and flexibility to subdivide floors for different scales of businesses; and
  - facilitate more active frontage to Whitfield Street with additional activity and natural surveillance at ground floor level.
- Given the advantages of relocating the residential use, we disagree with the estimated capacity for at least thirteen additional homes at the Network Building. The Tottenham Mews site offers an opportunity to re-provide the existing seven residential units under Local Plan Policy H3 and provide additional residential space in response to Policy H2. (
- We agree with the principle of providing affordable workspace, which can provide good conditions for start-ups and small businesses. However, some sites may be more suitable for larger floorplates and larger businesses, so the plan should provide flexibility for affordable workspace to be provided on more suitable sites elsewhere.
- We support the principle of providing publicly accessible open space and making the eastern end of Howland Street more pleasant for pedestrians. We also welcome the flexibility provided by paragraph 10.7 for publicly accessible open space to be created or enhanced nearby and propose that the plan should recognise that public open space could be provided along the north section of Whitfield Street by developing the interface between the street and the ground floor active street frontage.

## **2021/ 22 Consultation Responses**

No further responses were received

## **Council Response**

- Support for the public open space and public realm improvements for pedestrian and cyclists is noted.
- The allocated uses have been amended in the draft new Local Plan to include research and knowledge based uses to reflect the sites location within the Knowledge Quarter.
- The allocation recognises that the site is linked to the former Tottenham Mews site and that if the planning permissions are implemented then the indicative capacity for this site would no longer apply.
- The allocation retains the affordable workspace requirement and provision would be assessed against new draft Local Plan Policy IE4 - Affordable and Specialist Workspace.

- The allocation retains the flexibility for the public open space to be provided nearby, subject to being part of a strategic and comprehensive vision for the area.

## **Policy IDS2 – Former Tottenham Mews Day Hospital**

### **2020 Consultation Responses (Email)**

- We support the allocation of this site for housing, and clause (c) requiring respect for the roofline on adjacent buildings. We consider that development should contribute to clause (b) by reinstating historic street surfacing and lighting. We also suggest that clause (d) should be expanded to require development to respond to the materials, proportions and solid-to-void ratios of buildings on the opposite side of Tottenham Mews.
- This site is listed as having potential for small-scale community or health use. It is unlikely that a health use would be appropriate given its size and location.
- We support this policy, especially clause (a), and also support the permeability improvements proposed in paragraphs 10.16 and 10.19.
- We welcome the inclusion of this site along with IDS1 Network Building and 88 Whitfield Street. Our intention is to bring forward separate applications for these sites linked by a s106 agreement. The site is located in the Knowledge Quarter Innovation District, but we note that the proposed uses in this allocation do not include "knowledge quarter uses".
- We agree that residential use is the most appropriate use of this site, and consider it could provide off-site housing associated with redevelopment of the Network Building. On the basis of feasibility studies, we do not agree with the estimated capacity for additional homes, and consider there is capacity for up to 23 dwellings dependent on mix. We request that capacity figure in the Site Allocations Plan be amended to 12-23 dwellings accordingly.
- We support the aspirations for enhanced community safety, visual interest and pedestrian cycling routes, and agree that any new building should respect buildings opposite and the development of the Middlesex Hospital Annex. However, we believe the terminology "adopting a building line that matches the residential block currently under construction" is too prescriptive and the appropriate approach should be judged when a development comes forward.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The requirement to explore reinstating historic street surfacing and lighting has been included in the allocation in the draft new Local Plan.
- The allocation has been strengthened regarding the potential design responding to the scale, width and rhythm of buildings together with proportions and materials.
- The site is identified for a housing-led development. However, a small scale community or health facility has been retained as an allocated use given the former use of the site.

- The allocated uses for this site have not been amended to include knowledge based uses as the priority for this site is residential and or health / community facilities.
- The residential capacity reflects the planning permission for this site.
- The requirement to respect the building line set by the adjacent building block is retained in the allocation as it considered to be a sound urban design principle.

## **Policy IDS3 – Central Cross, 18-30 Tottenham Court Road and 1 and 2 Stephen Street**

### **2020 Consultation Responses (Email)**

- We note that the Central Cross name is no longer in use, the office element is known as 1 Stephen Street, and the retail elements have individual addresses in Tottenham Court Road.
- Figure 10.3 in the plan encompasses an adjacent site to the site, this is not part of the Derwent London ownership and it is not clear why it is shown.
- Derwent London has a design-led approach and our goal would be to reduce any current negative impact of this building, which was designed in the late 1960s. We support the incorporation of roof terraces that could be used by occupiers, but it is unlikely that publicly accessible space could be incorporated due to the difficulty of incorporating access.
- We appreciate the provision for any residential floorspace required as a consequence other policies to be provided on an alternative site nearby, should a suitable site be available.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- This site is not included as an allocation in the draft new Local Plan as development capacity on this site is expected to be under the thresholds for inclusion.

## **Policy IDS4 – 85 Camden Road**

### **2020 Consultation Responses (Email)**

- Do not support the policy as it would be an excessive development in massing and height contrary to policies for development in proximity to conservation area.
- Object to the indicative capacity as being excessive. It will destroy the existing green space, block light and create a canyon.
- Site should be within a conservation area.
- The five-storey block of flats on Camden Road is a mid-sixties development by Richard Siefert. The forecourt, once front gardens for the villas on Camden Road, then for a garage and then for a petrol station, is now grass open space which is open for public use and an access road to the ground-floor shops. It would be

unacceptable for the local conservation areas (either side) for this extra green space to be lost and for the light to be taken by an over-massed building such as at 78 Camden Road.

- If refurbishment for energy conservation of the building is needed, this should be achieved by retrofitting – as local householders do in the conservation areas. The costs of embodied energy in demolition and rebuilding are substantial and would be contrary to Camden's sustainability objectives.
- Proposal is contrary to policy to protect existing green space

#### Proposed uses

- The boroughs need for new housing should be balanced. These houses could be renovated.
- A health centre should be provided on the ground floor. Camden Town has no primary health care.
- This site appears to be outside a town centre and therefore any replacement retail floorspace should be limited.

#### Design

- A seven storey building would create a canyon effect.
- A comprehensive development is not required. Upgrading can be done without demolition. The building line should not be brought forward. Soft landscaping should not be internalised. Servicing should be improved with storage inside.

#### Transport matters

- Add a policy to jointly fund a cycle and pedestrian crossing of Camden Road to link to Rochester Square and planned cycle route CFR2.
- Should create a cycle cross path between Stratford Villas and Rochester Road.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- This site is no longer included in the Local Plan as it is not expected to come forward for delivery within the plan period.

## **Policy IDS5 – Shirley House**

### **2020 Consultation Responses (Email)**

- The viewing platform is subject to anti-social behaviour and rough sleeping. Below this there are murals attributed to Banksy and Robbo which may be worthy of retention.
- Ensure the layout of development does not result in a harmful reduction in daylight or lead to further overshadowing.
- Support inclusion of the site and proposed uses.
- A hotel in this location should be considered as an appropriate employment use.

- Shirley House is defined as a tall building. Additional commentary should be included to state that a tall/landmark building would be considered acceptable where a full design appraisal has demonstrated there is no material harm to interests of acknowledged importance.

### **2020 Consultation Responses (Commonplace)**

What changes do you think need to be made to policy to make it more effective?

2 people responded to this question raising the following

- There should be more affordable housing and less office space.
- Ensure sufficient light reaches the canal

Other comments included:

- Site is considered a landmark site and Shirley House is defined as a 'tall building'
- Additional commentary should be included that a landmark building would be acceptable on this site subject to comprehensive townscape appraisal and visual assessments.
- Any tall or taller building should make a positive contribution to the existing townscape

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The retention of street art is not a matter for the local plan but a matter for the site owners.
- Any impacts on the canal path and overshadowing would be assessed against Draft Local Plan policy A1 - Protecting Amenity.
- A hotel is unlikely to be considered appropriate on this site as it is not within an identified town centre. Any application for a hotel would be assessed against the allocation and draft Local Plan policy IE5 - Hotels and visitor accommodation
- The site is not identified in the Camden Building Heights study as a site suitable for a tall building (i.e. a building exceeding the tall building threshold for the area of 30m). The existing building is slightly under the threshold.

## **Policy IDS6 – Camden Town Station Over-site Development**

### **2020 Consultation Responses (Email)**

- Station needs to be upgraded with step-free access provided.
- Reference to widening of pavements on Kentish Town Road should consider protection of the cycle lane.
- It would be helpful to encourage Transport for London to work with adjacent landowners on bringing forward comprehensive redevelopment proposals.
- Text should make clear that proposals are for a station capacity upgrade.
- The site is envisaged as the main construction site to enable the existing station entrance to stay open: additional text is needed to clarify its role.

- The possibility of sharing the site with the developer bringing forward the Over Site Development can and should be looked at.
- Include an additional criterion stating that the over site development should not compromise TfL's existing/enhanced/additional infrastructure.
- Do not consider that it will be sufficient to enable development to come forward. It is particularly important to provide flexible and positive site allocations – flexible in terms of uses and scale – to allow future developments to be self-funding and viable. The policy is too restrictive on the site's potential in terms of the range and scale of development.
- A well-designed scheme could act as a marker/landmark through height rising above the prevailing context, subject to detailed townscape analysis and considerations of residential amenity.
- Negative and prohibitive statements on building height are contrary to the Good Growth principles in the Draft London Plan and recent approved development at Hawley Wharf of 8-9 storeys. Policy D9 of the Draft London Plan advocates for tall buildings to be located within highly accessible locations and transport interchanges. The policy should aim for the site to be appropriately optimised through a design-led approach.
- The current indicative residential capacity is stated as 50 additional homes – which equates to 185 dwellings per hectare, well below the site's potential capacity and the London Plan density matrix (which advocates 215-405 dwellings per hectare for sites with PTAL6b).
- The requirement for employment floorspace to give priority to accommodating creative industries, light industrial workshops and SMEs is overly prescriptive and likely to be detrimental to attracting occupiers to some of the floorspace. A range of business sizes would be appropriate.
- A wider range of town centre uses to be appropriate given the site's highly accessible and prominent location: retail (A1-A5) should be permitted, as should Class D2 uses and offices in any part of the site (not just Stuckley Place).
- Support the public realm improvements suggested in part d) of the policy.
- Object to the criteria f) and g) which relate to not causing harm to continuing operations on nearby sites and managing impacts arising from night time uses, as these matters are covered by existing Local Plan policy A1 and should therefore be removed.
- Recovery of heat from the Underground: this should not be expressed as a requirement in the site allocation as this could constrain delivery of the site.

### **2021/ 22 Consultation Responses (Email)**

- Transport for London Commercial Development resubmitted their comments from the previous consultation.

### **Council Response**

- The need for the station to be step-free is referred to in both Policy C1 and the allocation.
- The allocation in the draft new Local Plan has been amended to include reference to protecting and enhancing cycle lanes.

- Reference to TfL working with adjacent landowners has been included together with the need to protect TfL assets.
- The allocation has been amended to include a criteria that development must work effectively alongside existing, enhanced or new TfL infrastructure.
- The allocation recognises that the land has been acquired to facilitate construction work associated with the station capacity project and to ensure the existing station entrance can stay open
- The allocation has been drafted to include flexibility in relation to the proposed uses. The precise nature of any development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with all relevant policies in the Camden Local Plan and the London Plan.
- The site is not identified in the Camden Building Heights study as a site suitable for a tall building (i.e. a building exceeding the tall building threshold for the area of 30m). The height of any proposed development will be assessed against relevant local plan policies.
- The site is located in a conservation area and in proximity to heritage assets. The Town Centre is made up of generally smaller to medium sized retail units with limited provision of offices. We believe these characteristics and uses should guide future development on this site.
- The indicative residential capacity has been increased to 60 on the basis of an urban design assessment.
- The allocated uses are considered appropriate, and are based on the particular characteristics of the site and Camden Town's employment market.
- This site is a key location within the town centre and active frontages are a key objective for this site. The allocated uses have been amended to include food and drink uses.
- Support for public realm improvements is noted.
- The criteria protecting the continuing operation of nearby sites including Buck Street Market and the Electric Ballroom and managing impacts arising from night-time uses and activities are considered essential and have been strengthened.
- The allocation expects that the opportunity of heat recovery from the underground is explored, rather than requires its provision.

## **Policy IDS7 – Buck Street Market**

### **2020 Consultation Responses (Email)**

- Reference to the existing quantum of market floorspace being re-provided should be removed because it is inflexible/ not viable. Market uses should be provided at ground floor level only and other suitable uses provided above.
- By definition, a market is affordable by providing a range of unit sizes to allow businesses to grow. There should be no need for the units to be affordable as set out.
- The approach to mixed-use development needs to be flexible – mixing market and residential uses can be challenging.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- This site is not included as an allocation in the draft new Local Plan as the nature of any development expected to come forward on this site is not clear at this time and therefore can be assessed against the relevant Local Plan policies at that time.

## **Policy IDS8 – Grand Union House**

### **2020 Consultation Responses (Email)**

- Overall, the allocation is supported for employment-led development with retail and food and drink uses on the ground floor. (Camden Mixed Use Development Ltd)
- Agree there is significant potential to activate the ground floor frontage, deliver public realm enhancements and remove parking. There is potential to intensify the site and contribute to the vibrancy of Camden Town centre.
- The policy should be revised to best meet business need by including support for refurbishment of the building before substantial demolition is considered. This could improve the efficiency of the accommodation and allow for additional usable floorspace to be provided.
- Given the site's current B1 use, ongoing commercial use should be prioritised over mixed-use objectives. The introduction of a residential core and amenity areas is likely to compromise the efficiency and quantum of commercial uses, particularly if a refurbishment option was pursued.
- The reference to residential use and the indicative capacity should be removed.
- A wider range of town centre uses should be supported at ground floor level – including offices – if well designed to deliver a successful active frontage.
- Space should be released to the public domain on Kentish Town Road to allow room for widened pavements and a protected cycle route.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- Planning permission has been granted for this site and is expected to be implemented. Therefore, although the site allocation is being retained in the draft new Local Plan pending completion of the scheme, it is proposed that no detailed development criteria is set out for the site.

## **Policy IDS9 - 202-204 Finchley Road**

### **2020 Consultation Responses (Email)**

- Welcome the inclusion of light industrial under the proposed uses.



- No infrastructure concerns regarding water supply or waste water are envisaged.

### **2020 Consultation Responses (Commonplace)**

- 3 people agreed with the proposed use 1 person did not
- 1 did not agree with the indicative residential capacity and 2 were unsure

#### What changes do you think need to be made to make the policy more effective?

- Amend the policy to include reference to the soon to be adopted Redington Frognal Neighbourhood Plan. This site is identified as a redevelopment opportunity site (RF1) and).
- Object to the indicative additional residential capacity of 12 as it will result in an increase in bulk and massing at the rear of the site and detrimentally impact neighbouring properties and the Conservation Area.
- Support that reference to ensuring the neighbouring copse is preserved and enhanced. (2 responses)
- Policy should be informed by Camden's Climate Emergency declaration and include reference to trees and soft surfaces.

#### Other comments included:

- The copse is identified as a Local Green Space in the Neighbourhood Plan
- Focus of the allocation is too narrow. Housing delivery should not be the only consideration. Public realm and quality of life points should be included.

### **2021/ 22 Consultation Responses (Email)**

- Building has begun on adjacent planning permission for a new house. Care must be taken not to blight this property.
- Concerned about building above or near the railway that will impact on loads. (Resident)
- Redington Frognal Neighbourhood Plan guidance for this site needs to be taken into account.
- Should seeks a new building setback to allow for a pocket park and much needed greening on Finchley Road.
- A replacement building could be appropriate with retail or a community facility such as NHS GP with residential above.
- Should include substantial greening and biodiversity measures to the rear including trees, native hedgerows and natural pond to help reduce high levels of particulate matter.
- Any new building should be four storeys in height and constructed in brick and stone.

### **2021/ 22 Consultation Responses (Commonplace)**

#### What development priorities should be the main focus of the policy?

5 people responded this this:

- Creating new open spaces (5 responses)

- Environmental improvements, Building heights and massing, Climate change (3 responses)
- Design and heritage matters (2 responses)
- Improving the community facilities offer, how people move around the area, promoting new homes, providing employment

What specific points do you think should be included in the policy?

3 people responded to this question raising the following points:

- New green open space to enhance Finchley Road (2 responses)
- Woodland must be retained
- Reduced heights to protect neighbours' amenity
- Set the building line back and provide a pocket park

What type of homes should be provided?

- Priorities identified for new homes included for larger families, small families or homes for older people (independent living). (3 Residents)

Is there anything missing from the wider area that could be provided on site?

3 people responded to this question raising:

- area is deficient in open space
- a community facility
- Substantial greening and biodiversity measures are needed.

Is there a need for new or improved infrastructure to support additional growth?

3 people responded:

- More accessible open green space
- A NHS GP practice or other community facility (2 responses)

Is the site suitable for a taller building?

- 4 people responded to this question and did not think the site was suitable for a tall building on the basis of building heights on the east side generally being 4-6 storeys.

Any other comments.

- Policy should offer a vision similar to the Neighbourhood Plan
- No backland development should be allowed

**Council Response**

- The allocation has been amended in the draft new Local Plan to include references to the adopted Redington and Frognal Neighbourhood Plan.
- The indicative housing capacity figure is based on an urban design assessment of potential taking into account site context and constraints.
- The copse within the site boundary is not identified as a Local Green Space (LGS) in the Neighbourhood Plan. The copse is referred to in the allocation, which notes that it is protected by a Tree Preservation Order.

- The Neighbourhood Plan's objectives for this site will be taken into account at the planning application stage.
- The rear of the site is considered suitable for development as a previous planning application has been approved on the site and the owners have indicated the site could be available for development.
- The allocation envisages the retention of the main building and therefore cannot specify setting back the building line to accommodate a pocket park.
- It is not considered appropriate for a site allocation to prescribe such detailed design matters as specific materials.
- If a more comprehensive scheme is considered appropriate, taking into account Draft new Local Plan Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings, specific matters relating to open space requirements and community facilities would be considered against relevant topic specific policies in the new Draft Local Plan.

## **Policy IDS10 - Gondar Gardens**

### **2020 Consultation Responses (Email)**

- The boundary of the site is questioned in relation to cutting across the of the reservoir and should be contiguous with the SINC boundary.
- Figure 10.10 omits part of the SINC and should be corrected.
- Site map is incorrect as not all SINC is shown.
- Support the policy but think it is too tightly defined and should be amended to 'residential led' in order to allow potential other forms of housing to be considered, such as older persons housing.
- The indicative housing capacity of 30 should be removed in favour of a design led approach, particularly as the type of home provided will affect the numbers.
- The indicative capacity is excessive.
- The residential capacity should be defined by the number of habitable rooms and should be a maximum capacity based on previous appeals.
- The indicative residential capacity of 30 is not considered plausible without destroying the heritage structure.
- Largely support the policy, in particular the emphasis on conservation and the number of proposed units.
- Policy wording should be amended to emphasis development can on be on the undesignated area and strengthened to further protect and enhance the SINC.
- Policy wording should be amended to specify that the gap should be retained through a development on the frontage.
- Policy wording should be amended to recognise the amenity value of the open space itself to Sarre Road residents.
- Policy wording should be stronger in requiring that any building design should match the character of the adjacent mansion block.
- Ensure that text reflects that former consents (albeit lapsed) will have some weight in considering
- Refer to the importance of high quality grasslands and appeal decision.

- Supporting text should be consistent with the policy wording to preclude development on the SINC and should refer to maintaining both the quality and quantity.
- The allocation is not considered viable as it would require the removal of the Victorian brick structure. The site should be withdrawn and the green space and SINC designations re evaluated.

### **2020 Consultation Responses (Commonplace)**

- 3 people agreed with the proposed uses and 3 people did not
- 6 people did not agree with the indicative residential capacity

#### What changes do you think need to be made to make the policy more effective?

5 people responded to this question raising the following:

- Site should not be developed and be turned into an ecology asset / playing field for school.
- Build the housing on the frontage (2 responses)
- Design should be sympathetic to the mansion blocks and retain the rest and green space.
- Revisit the designation of the area proposed as the designation of the SINC is not correct
- Tighter wording on retaining views across the site
- Reduce the housing numbers
- Wording needs to be more precise (2 responses)

#### Other comments:

- Any development on this site would result in traffic and air quality problems and should not go ahead.
- Number of houses should be reduced
- Site is not suitable for redevelopment as would result in the loss of the heritage reservoir
- Camden should prioritise environmental protection over unnecessary development.
- Site map has omitted part of the SINC adjacent to Gondar Gardens Road and South Mansions

### **2021/ 22 Consultation Responses (Email)**

- GARA re-submitted original comments listed above.
- The SINC and open space should be protected and enhanced. (CPRE)

### **Council Response**

- Site of Nature Conservation Importance have been reviewed by London Wildlife Trust to support the draft new Local Plan. The Policies Map will be updated

where appropriate to reflect their findings. Site maps for allocations in the draft Plan only show the extent of the site and do not indicate policy designations.

- Housing is the priority use of the draft Local Plan in order to assist with meeting Camden's housing need.
- The indicative housing capacity figure reflects the planning history of this site and an assessment of site constraints.
- The wording of the allocation has been amended to ensure development is focused on the undesignated parts of the site and recognise the importance of the SINC and Local Green Space.
- The allocation has been strengthened in relation to biodiversity and requires development to provide a net gain in ecological value.
- The allocation states that development must be designed to protect views across the site.
- Previous appeal decisions are referred to in the allocation.
- It is not considered necessary or appropriate for the allocation to require a gap to be provided on the frontage or for buildings to be of a specific design. These matters would be considered against relevant design policies in the Local Plan.

## **Policy IDS11 – Wending Estate and St Stephens Close**

### **2020 Consultation Responses (Email)**

- Suggest that the Grade I listed Church of St Martin is identified and considered as part of the policy given its proximity to the site.
- The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.
- Criteria c and d should emphasise that the streets should be for pedestrians and cyclists.
- Welcome the statement in criterion f. to ensure that the Gospel Oak Health Centre, nursery and hostel are able to maintain continuity of service throughout the redevelopment period. Re-provision of Gospel Oak Health Centre / Gospel Oak regeneration will be needed and planning contributions may be required. The provision of new healthcare space should also fit with service strategy in terms of location, size and design.
- The wider area has very high levels of deprivation and severance and only a planning framework will be able to address these issues.
- Densities are too high, and the approach is commercially driven

### **2021/ 22 Consultation Responses (Email)**

- New workspace should be provided at ground level. The new workshop spaces the Council has facilitated within undercrofts as part of the CIP are low quality and not as good as those they were intended to replace. Such spaces will only be able to support solo businesses. (Resident)
- Houses, rather than flats, should form an element of housing delivery. There is an over-emphasis on flats, particularly for private sale/lease. The majority of these will be 1 or 2 bed locking in a transient population and is unlikely to provide the

population necessary to support local infrastructure and services (e.g. schools, range of NHS services). (Resident)

- Houses with gardens and multi-levels should be provided. (Resident)
- There is no evidence that the full demographic impacts of the increased population are being planned for. (Resident)
- The proposed housing numbers are predicated on a 'more is better' approach rather than detailed area-based research. (Resident)
- Camden is not meeting its waiting list requirement for social rent housing. The CIP programme does not come close to addressing what is needed. (Resident)
- The demolition of perfectly usable housing stock should be banned. (Resident)
- The building should be retrofitted. (Resident)
- Trees must be retained. (Resident)
- Increase the proportion of green space through the creation of a generous park. (CPRE London)
- Peter Barber Architects worked with Wendling residents for 2 years and designed an infill scheme which displaced no one while building 250-300 new homes. It has not been explained why this scheme has not been adopted for climate mitigation and social reasons. (Emerging West Kentish Town Neighbourhood Forum)

### **Council Response**

- Reference to the Grade I listed church has been included in the allocation in the draft new Local Plan.
- Reference to the Mayor's Good Practice Guide to Estate Regeneration has been included.
- Cycling has been included in the policy criteria in the allocation.
- The health care and community facilities requirement has been amended to reflect the Council's latest position.
- The Community Vision as now been adopted as supplementary planning guidance.
- The indicative housing capacity is based on the Community Vision figure..
- Any new workspace provision will be assessed in accordance with draft Local Plan policy IE4 - Affordable and specialist workshops.
- The nature of the housing provided on the site will be informed by relevant Local Plan housing policies.
- The allocation aims to deliver the maximum regeneration benefits for the existing residents and area whilst also delivering new homes to help meet the borough's housing need.
- Since the Peter Barber Architects work, there has been further work undertaken with the community led by Met Works, which was supported at public ballot and is reflected in this allocation.

## **Policy IDS12 – Mansfield Bowling Club**

### **2020 Consultation Responses (Email)**

#### Open Space / Sporting facilities

- Fully support the use of this site for an enhanced sport/leisure offer and a new public open space. The Dartmouth Park Neighbourhood Plan recognises that the site is in part a designated area of private open space and supports the retention of this open space, particularly as the site is within an area that Camden Council has identified as deficient in open space. The sport and leisure facilities should remain publicly accessible.
- Support re-provision of a public open space and a sporting or recreation facility.
- The policy lacks definition in two respects: it is not enough that public space should be new; it should also be commensurate with the demands that will be created by new and existing residents. The policy should be changed to something like "new and sufficient" public space. The same ambiguity applies to the 'enhanced' tennis facilities: the nature of the enhancement should not be left to chance. For years Kenlyn Tennis club has been unable to host home matches because it has only two courts. The policy should define 'enhanced' to mean the provision of (at least) three all-weather tennis courts.
- The Mansfield Bowling Club site needs more specific commitments to providing tennis facilities and a public open space. The policy should state, in terms of square metres, how much of the site must be dedicated to each.
- There should be clear clause that the tennis facility should be managed by a non-profit community local tennis club, with the former tenant Kenlyn LTC as the preferred club.
- Although work on site has technically started, there has been no activity on site for an extended period, and we understand interest in the site has been shown to at least one other developer. It is therefore appropriate to retain this site in the Site Allocations Plan.
- The site would in principle be appropriate for a care home or similar facility, provided the building does not exceed the size and massing of the current approved development. If it is to be used for housing, there should be a commitment to the maximum amount of affordable housing provided for in the Local Plan policies and the Dartmouth Park Neighbourhood Plan, with intermediate housing included.
- The housing density is surely excessive and there does not seem to be any provision for affordable housing.
- Would like to see the policy significantly strengthened, specifically with an indicative timeline and milestones for the development to prevent what presently seems to be the case that local people are being denied the opportunity to enjoy sport and leisure

### **2021/ 22 Consultation Responses (Email)**

- Formally support use of site for an enhanced sport/leisure offer and a new public open space. The sports/leisure facilities should be publicly accessible.

- Support retention of the designated private open space on part of the site.
- There has been no development activity for an extended period and there is interest from at least one developer – justification for the site allocation being retained.
- A care home is an appropriate use provided it does not exceed the size and massing of the current approved development.
- If housing comes forward, should include intermediate housing.
- The allocation is unnecessary – there is a presumption that sites with full planning permission would gain planning consent again once the existing permission has lapsed. If the Council wishes to retain the allocation, then it should refer to both self-contained housing and care home accommodation
- The site would be able to support a 60-85 bed modern purpose-built care home facility as well as 15 'Housing with Care' units.
- Supporting evidence estimates a shortfall of 756 care home beds in Camden by 2030 ('market standard' bedrooms providing ensuite facilities).
- There is an estimated a shortfall of approximately 429 'Housing with Care' units in Camden.

### **Council Response**

- The allocation in the draft new Local Plan has been updated to require the enhanced tennis facilities in line with the approved planning permission and to ensure any new application meets open space standards. The allocation requires an additional court and increased playing areas. It is not possible for the Local Plan to control who manages the court.
- Self contained housing is the priority use of the Plan. Any application for more specialist housing would be assessed against Policy H6C.
- The indicative housing capacity in the allocation reflects the approved planning permission.
- The allocation has been amended to include reference to the scale of development needing to reflect the surrounding area and not detrimentally impact on the designated open space and local green space.
- It is not considered appropriate to include a figure for any other form of residential space at this time as this will need to be assessed on the basis of need at the time of application.

## **Policy IDS13 – West Kentish Town estate**

### **2020 Consultation Responses (Email)**

All comments are from residents unless stated.

- The policy should refer to the Intend to Publish London Plan Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration. (Greater London Authority)
- Criteria c and d should emphasise that streets should be for pedestrians and cyclists. (Camden Cycling Campaign)

### **Density**



- When combined with increased density on neighbouring sites and in Kentish Town the impacts on infrastructure of all kinds will be huge. This needs proper town planning and development control to manage these impacts.
- The proposals are too dense and housing numbers too high.
- Housing capacity is too high given the number of significant large developments in the surrounding area.

#### Housing type and mix

- Developers prefer small one beds as they get the most profit, a model the Council is following. However, the area desperately needs larger homes for families.
- Focus on building affordable family homes and NOT private studios or 1/2 bedroom flats that are less likely to include children. This will lead to creation of a dormitory town.
- More social housing is needed to protect schools at risk.
- Small private homes are sold off mainly to overseas investors that profit from high rents.
- The policy should reference building typologies that relate to the neighbourhood, e.g. Neave Brown's commitment to high density, low rise design.
- In view of the falling birth rates and lack of families and children in the area it is vital that redevelopments like this have much more social housing and more 3+ beds apartments.
- More family sized housing needed, not 1 bed flats and studios.
- The scale of development should be commensurate with existing conditions.
- The policy should provide clear guidance on infrastructure required, the housing density, typology, mix and tenure.
- Provide more affordable housing for key workers.
- Unclear how these plans will help to save Queen's Crescent market – people living in private flats will not use it.

#### Consideration of retrofit/refurbishment of housing

- Investigate low energy refurbishment + infill + extensions as the greenest/least disruptive solution.
- Demolition on this scale cannot be justified in a climate crisis – the Council should refurbish this housing.
- The approach should be based on retrofit and deprivation with family housing, safe routes to schools and facilities, draw focus on Queen's Crescent to support the businesses there, retain trees and add more. Look at ways to refurbish rather than demolish, manage phasing to keep the community intact and avoid adding any additional vehicular routes. .

#### Impact of construction programme

- It is essential that if and when demolition occurs, it is done in phases. If it all occurs at once, then families will move out of the area and are very unlikely to come back.

- Development works needs to be staggered so that families and their children can stay in the area and interruption to schooling is avoided.
- The proposals do not give residents a clear idea where their new home will be in the development.

#### Employment uses

- Open up railway arches to east of site for business use and create pedestrian link to Kentish Town West station.
- More workspaces are needed to revive Queen's Crescent.
- Workspaces have already been sold off by Camden yet there are no plans for workspace in this plan.
- Should be clarity about where non-residential uses will be incorporated.

#### Trees and open spaces

- There is no policy recognising the established trees and green environment on the estate.
- Retain existing mature trees.
- Enhance and enlarge green space and play areas.

#### Other matters

- The wider area has very high levels of deprivation and severance and only a planning framework will be able to address these issues.
- Too much woolly language/ jargon, e.g. "significant regeneration benefits".
- Do the new routes shown on the map imply the provision of a new road? This would ruin areas that are quiet and safe.

### **2021/ 22 Consultation Responses (Email)**

All comments are from residents unless stated.

#### Height and density

- Limit height and densities as no families given a choice want to live in a high density area. Promote lower density stacked maisonettes with small private gardens and balconies. Front gardens and stoops help to increase passive surveillance and promote community.
- Nothing too high, keep it in line with the residential houses in the surrounding streets.
- The proposed housing numbers are predicated on a 'more is better' approach rather than detailed area-based research.
- The whole area does not have tall building, except for one or two exceptions that stand out like a sore thumb. This will just exacerbate the situation.
- Tall buildings would conflict with the conservation area status of many of the nearby streets.
- The proposed towers would dominate the area and be particularly oppressive for the existing social housing blocks to the south and east.

- Oppressively high tower blocks (which will be visible in many of the two Conservation Area streets) are completely out of scale and out of place in a predominantly low-rise area. Camden has many fine examples of relatively high-density, low-rise housing, and we would want to see this here.
- This is not part of the centre of the city of London. Tower blocks have been rightly criticised for safety and community cohesion reasons for many years, since Ronan Point. Discourage tall buildings as dwellings.
- Maintain views whilst developing homes, reduce the height of the towers. Views of The Heath are a common good – buildings can be tall without ruining this.
- New buildings should be designed to complement the existing scale of the area with buildings no higher than 6 storeys, and typically 3-4 storeys. Camden's current plans show small enclosed courtyards enclosed by tall buildings that will create overshadowed external space.
- Camden needs to stand up the Greater London Authority and tell them that tall buildings are not appropriate for this borough, anywhere.
- Facilities in the area are sufficient, albeit in poor condition, if density is limited.

#### Housing type and mix

- Houses, rather than flats, should form an element of housing delivery. There is an over-emphasis on flats, particularly for private sale/lease. The majority of these will be 1 or 2 bed locking in a transient population and is unlikely to provide the population necessary to support local infrastructure and services (e.g. schools, range of NHS services).
- Camden is not meeting its waiting list requirement for social rent housing. The CIP programme does not come close to addressing what is needed.
- Protect communities by reducing transiency caused by loss of families, facilities, business space and safety issues.
- Schools need pupils and will close if families are lost due to the development.
- The production of design guides on typology and massing would make a difference.
- Due to the development model proposed by Camden, practically none of the additional homes will be for social rent.

#### Consideration of retrofit/refurbishment of housing

- Look seriously at retrofitting additional floors, balconies, insulation etc.
- Retrofit is able to improve sightlines, safety, accessibility, cycle parking etc
- A real study of retrofitting must be completed
- Prioritise refurbishment rather than demolition and new build. Retrofit zero carbon heating and hot water to reduce carbon emissions over the next 5-10 years.
- Additional council homes can be provided by renovating, reconfiguring, retrofitting and extending the existing blocks.
- A study carried out by a local architect shows that the existing estate can be retrofitted at a significantly lower carbon cost.

### Employment uses

- Provide new workspace at ground floor. The new workshop spaces that the Council has facilitated in undercrofts as part of the CIP are low quality and not as good as those they were intended to replace. Such spaces will only be able to support solo businesses.
- There is a severe lack of space for SMEs and community-based activities. More business and community space should be planned, backed up by an economic plan for the area.
- Space for SMEs have been lost over the past 20 years. The only significant new commercial space is at King's Cross which is tailored for corporates and mostly provides work for commuters.

### Trees and open spaces

- Protect existing green spaces and trees.
- Mature trees cannot be reprovided. We need them now.
- Provide an open space opposite Rhyl school.
- Most people would prefer a small private garden to a large, almost always unused, one.
- The current proposals include the felling of many of the mature trees on the site and loss of green space, both of which are important in tackling climate and ecological emergency.
- The policy would harm residents' health and wellbeing by building on existing green space, create a potential flood risk through additional run-off and would undermine attempts to tackle climate and ecological emergency.
- The environmental services provided by the mature trees will not be replaced by new trees. They therefore must be protected, or else residents will suffer from poor air quality, overheating and increased flooding in the near future.
- The loss of the open green space along Grafton Road, to be replaced by blocks built right up to the street, will have an adverse effect on many.
- In order to mitigate and adapt to climate change, the Council should be planning nature-based solutions for local communities in Camden. This includes trees to sequester carbon from the atmosphere and soil and green areas to act as carbon sinks, reduce the risk of flooding, foster biodiversity and provide benefits for residents.

### Other

- There is no evidence that the full demographic impacts of the increased population are being planned for.
- The estate is intermingled with existing Victorian housing which have conservation status. New development should complement and reflect this. Infill should be positively discouraged, as should demolition.
- The conservation area should be acknowledged, and its more successful principles applied within the site.
- Provide electric vehicle charging facilities.
- New buildings should be built with a timber structure to reduce carbon emissions due to construction.

- The roads are already jammed every morning. Adding more homes will make this intolerable, especially as public transport has its own lane on Prince of Wales Road and Kentish Town High Street.
- Consider youth safety services.
- Consider provision of a family community hub.
- Provide a safe route connecting the Heath and Talacre.

### **Council Response**

- Reference to the Mayor's Good Practice Guide to Estate Regeneration has been included.
- Cycling is included in the policy criteria in the allocation in the draft new Local Plan.
- The allocation aims to deliver the maximum regeneration benefits for existing residents and the area whilst also delivering new homes to help meet the borough's housing need. The indicative capacity and proposed density are therefore considered to be appropriate and are based on the Community Vision figure.
- The allocation has been amended to refer to requiring the reprovision of council homes and maximising delivery of additional affordable housing.
- The mix of additional housing will be assessed in accordance with relevant draft Local Plan housing policies including policy H6 - Housing choice and mix, and policy H7 - Large and small homes.
- The draft Local Plan recognises the climate emergency and the need to consider retrofitting options. Any application would need to be assessed against policies in Chapter 8 - Responding to Climate Change and all other relevant policies, whilst balancing this against the regeneration benefits a comprehensive scheme could deliver for the area.
- The policy has been amended to include a reference to the need for a housing plan to minimise disruption to existing residents during the construction and aiming to ensure residents only move home once, with early phases of development being for decant housing prior to large scale demolition.
- New workspaces could be considered and any new workspace provision will be assessed in accordance with draft Local Plan policy IE4 - Affordable and specialist workshops.
- Additional text has been added on the improvements to open space expected.
- The Gospel Oak and Haverstock Community Vision has now been adopted as a supplementary planning document.
- Proposed routes are not shown on the maps included in the draft Plan.
- The Camden Building Height Study considered that this site is a location where tall buildings may be an appropriate form of development and this is recognised in the site allocation.
- The conservation areas are recognised in the allocation.
- Draft Local Plan Policy NE3 - Tree Planting and Protection would be used to assess impacts on any existing trees on site and seeks to ensure development incorporates additional trees and vegetation wherever possible.

## IDS14 Royal Free

### 2020 Consultation Responses (Email)

#### General

- Do not support Policy and request that changes are made to address points raised in consultation response letter. We do not see why the existing hospital should be included in the site allocation, there are no plans to redevelop the hospital
- Support the designation of the Royal Free Hospital in the Site Allocations plan
- Accommodation for NHS staff is ancillary to healthcare and should be included in any development proposal for the site
- All sites should ensure provision of dwellings of 3 or more bedrooms/family sized dwellings to support families, school yield etc.
- Some site policies include positive statements which would help to improve health and wellbeing. However, this is not consistent, and consideration could be given to overall policy or statement which coordinates references in IDS14 to maximising social value during the planning, construction and end user phases of development ensuring that development benefits local people and contributes to reducing inequalities and increasing life chances. There is reference to social value frameworks that could be used to secure commitments, however there is no Camden Local Plan Policy to secure these frameworks.

#### Proposed uses: flexibility and needs

- Hampstead Group Practice is a tenant of Royal Free Hospital (RFH) and believe their building may be part of the redevelopment plans.
- See merit in the general development of the site but unclear from the policy whether consideration is being given to making provision of GP premises in future plans for the site and the plans for the premises currently occupied by the GP practice.
- Opposed to policy as there is a need to establish a collaborative approach with the RFH with regards to the future provision of GP premises on site
- No mention of primary care needs of Camden patients and the broader community needs that GP practices are expected to provide and how accommodating this will be supported/acknowledged.
- The GP practice/premises on site is chronically short of the space needed to deliver care to its patients. The practice needs adequate facilities and space in which to maximise specialist skills and services, work collaboratively with others, and improve efficiencies. This is important as it impacts the wider Primary Care Network and the provision of primary care across Camden.
- The strategy to drive some patient services out of hospitals into primary care units is driving greater demands for space, design and functionality of the GP premises on site. This only emphasises the importance of making provision for primary care facilities near RFH

- The healthcare sector is one of continual and often rapid innovation and change. Consequently, it is essential that healthcare providers are able to exercise a great degree of flexibility in the use of their buildings and landholdings.
- All of the uses mentioned in the site allocation may not be necessary. Uses should be needs driven.
- The draft plan identifies the Royal Free Hospital as a site where 'complementary / supporting uses' are suitable to support the future growth and function of the hospital. This could include additional primary healthcare capacity as part of the development of a health and research campus.
- Additional health care capacity could be achieved/provided at the Royal Free site alongside the hospital.

#### Operational continuity of hospital and phased development

- Proposals/requirements of the site allocation must not compromise the operations of resilience of the hospital or give rise to safety issues.
- Future development of surplus land at Pond Street should be needs driven and be capable of being brought forward in phases and not as a "single comprehensive redevelopment".
- The Trust has not had any input into the draft site allocation, which assumes that the hospital will grow in the future, which is not necessarily the case. The trend for treatments to be delivered outside of a major acute setting, and space efficiencies may mean there are reduced requirements for floorspace.
- The improvement of the health offer is not a matter for the local Plan/site allocations. This is to be determined by relevant healthcare commissioning bodies.
- The requirement to provide complementary uses that support the on-site health offer is an unnecessary requirement. It potentially cannot be guaranteed by the Trust or any other party developing land within this site allocation

#### Accessibility, connectivity and parking

- Criterion c requires improvements to movement across the site. Whilst this may be a desirable aim, the access strategy to the main hospital building via the Pond Street entrance must work with challenging topography and the internal arrangement of the hospital which is laid out to optimise visitor flows to different services.
- The Trust also understands and has the desire to improve access at the Pond Street site; however this will not be so easy in the short term as any changes to access arrangements impact on the overall internal arrangement of the hospital and these changes are costly and time consuming to achieve.
- There is a risk to security of the hospital being compromised as a result of changes to access and entrances/routes or increased permeability
- Include a route from Fleet Road to Rosslyn Hill for pedestrians and cyclists.
- The retention of re-provision of car parking at Pond Street is essential to the operation of the hospital. Car parking currently on the site is essential and cannot be lost.

## **2020 Consultation Responses (Commonplace)**

\_1 respondent supported the proposed use; 2 were unsure

- 1 respondent did not support the indicative residential capacity; 2 were unsure

### What changes do you think need to be made to make the policy more effective?

2 people responded to this question, making the following points:

- Camden appears to be neglecting its responsibilities to its neighbours as there are no suitable fences or walls between the busy building / thoroughfare at the back of the Royal Free and the border of the Russell Nurseries Estate, including a family picnic area.
- Needs to be clearer what 'complementary activities' are. It is already a complex and dense site and any further development would need to clearly provide a service to improve the environmental / quality of life for existing surrounding residents.

### Other comments included:

- Can anything be done to improve the appearance of the Royal Free which one of the ugliest and messiest buildings in Camden; a visual eyesore in an otherwise beautiful area. Its environs are also often dirty. The gardens run by volunteers along Pond Street are wonderful and maybe more effort to green the site could be made. The Marks and Spencer development on the old cinema site is a terrible lumpen collection of mismatched elements adding to the visual incoherence and is the kind of thoughtless development which should be resisted.
- The tenants and residents' association of the Russell Nurseries strongly lobbies to be included in this specific project, so that boundaries between the hospital, its annexes and the back yards of those occupants are divided by secure and protective fencing or walls - and trees are built to help alleviate the dust and pollution from the busy roadway all the way up to Pond Street.
- Roof gardens and relaxation spaces sound great: but where and for whom? It's already a complex and dense site.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- This site is not included as an allocation in the draft new Local Plan. The site will not provide any additional residential development and additional healthcare floorspace will be assessed against relevant Local Plan policies; therefore it is not considered necessary to specifically allocate the site.



## **Policy IDS15 - 330 Gray's Inn Road**

### **2020 Consultation Responses (Email)**

- Policy wording should be amended to specially allow for a hotel use on this site, to add a greater diversity of uses, respond to the surrounding character, and anticipated growth from visitors attracted to the quarter.
- The indicative housing capacity should be amended to 'up to 100 additional homes' rather than 130, as the site has additional constraints to delivering a truly mixed development.
- Site falls within a sensitive architectural setting; it is important that new development enhances the historic environment.
- Regard should be had to preserving the historic setting of the western end of Wicklow Street, a remarkably well-preserved 'forgotten' backwater of King's Cross.
- Suggest the following policy addition - Any development scheme along Swinton Street must respond appropriately to the scale, materials, proportions, and solid to void ratios of the buildings opposite, and aim to enhance this aspect of the historic environment.
- Suggest planning obligations are secured to ensure improvements to the public realm along Swinton Street, specifically to reinstate historic street furniture and surfacing (to reflect that of Wicklow Street to the north).
- Para 10.146 – An interesting way to enhance the historic environment would be to provide a public space which overlooks this railway and which provides views northwards towards King's Cross and possibly further southwards. Such a public space would be a unique and invaluable asset to the area and would certainly act to enhance appreciation of the historic environment. Such a public space could also provide a north-south pedestrian link between Swinton Street and Wicklow Street, increasing the permeability of this site.
- 330 Gray's Inn Road (Policy IDS15) and Eastman Dental Clinic (Site IDS20t) have become available for redevelopment following the relocation of the Royal National Throat Nose and Ear Hospital and the Eastman Dental Hospital to new premises in Huntley Street. It is not clear in the plan that these sites are connected as part of the University College London Hospitals plans.

### **2021/ 22 Consultation Responses (Email)**

- Groveworld re-iterated their initial comments made in 2020.

### **Council Response**

- The allocation in the draft Local Plan does not include hotel use, as housing is the Council's preferred use for this site and is the priority use of the plan. It is noted that planning permission has been granted for a mixed use development which includes a hotel, and this would be a material consideration in any future application.
- The indicative housing capacity has been amended to reflect the planning permission granted.

- The allocation requires proposals to respect the character of the original buildings, the wider site and their setting and recognises the historic context.
- The allocation requires development to improve permeability across the site and make provision for a pocket park / public amenity space.

## **Policy IDS16 - Belgrove House**

### **2020 Consultation Responses (Email)**

#### Proposed uses

- Reference to provision of self contained homes on this site should be removed if knowledge and innovation floor space is provided, which is a key priority for this area.
- The current use is a non designated Industrial Land and B8 uses which are essential to the functioning of London's economy and should therefore be retained on site.
- Delivery of housing on Argyle Square frontage should be removed.

#### Design elements

- The positive contribution of any redevelopment scheme to the historic environment must outweigh any heritage harm caused by demolition and should be of an exceptional architectural quality to enhance the setting of the exceptional heritage assets in this area.
- Reference to the 'merits of the existing building' should be removed as Historic England have no objection to them removal of this building.
- Support the requirement for an inviting frontage to Argyle Square but should also reference the uniform character of the Georgian terraces.
- The low building heights references are slightly misleading and reference should be made to the taller buildings in the vicinity.

#### Public realm improvements/ public benefits

- Reference to the public and community benefits should remain as flexible as possible and should not therefore specifically require affordable community space.
- Support the policy requirement to improve the pedestrian and cycling environment.
- The policy wording should include a line to the effect that any benefits in terms of open space should be proportionate to the scale of the proposals coming forwards on the site.
- Policy should support improving pedestrian flows and access to the tube but these can be achieved without requiring setting the building line back.
- No infrastructure concerns regarding water supply or waste water are envisaged.

### **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- Planning permission has been granted for the development of this site for knowledge-based uses and the buildings have been demolished.
- Self-contained housing is retained as an allocated use as this is the priority use of the Local Plan.
- The specific reference to housing on Argyle Square has been removed from the allocation.
- The allocation states that development must include provision of community functions. Flexible and affordable space for the local community is referenced as a way this can be achieved.
- Setting the building line to match others on Euston Road is considered an essential requirement to allow for improved pedestrian movement in this location.

## **Policy IDS17 - Thameslink station, Pentonville Road**

### **2020 Consultation Responses (Email)**

- No infrastructure concerns regarding water supply or waste water are envisaged.

### **2021/ 22 Consultation Responses**

- No further responses were received

### **Council Response**

- Comments noted

## **Policy IDS18 – Land bounded by Pakenham Street and Wren Street**

### **2020 Consultation Responses (Email)**

- The Calthorpe Estate is in the Bloomsbury Conservation Area and is a remarkably well-preserved Georgian area, which retains its original residential character and is home to a strong community. Development should not have a negative impact on the uniformity of this area in terms of style, proportion and materials.
- We suggest that Policy IDS18 clause (b) be replaced by the following requirements:  
[Development must] be informed by a robust understanding of the historic context of the site and immediate neighbourhood, and the merits of existing buildings including 23-24 Pakenham Street and 21 Wren Street. Any redevelopment scheme must enhance the historic environment and be entirely deferent to the architectural context of the residential surroundings, by responding appropriately to the scale, massing, proportions, materials, and solid-to-void ratios of the surrounding Georgian terraces. Façades onto Wren Street and Pakenham Street should be of the highest architectural quality in response to those offered by the historic terraces; and  
[Development must] entirely respect the residential nature of the immediate

surroundings, providing homes, along with appropriate commercial and educational uses which enhance the residential character of this area and serve the existing local community.

- Policy IDS18 clause (c) should indicate that the proposed east-west route will be "for pedestrians and cyclists". We support paragraph 10.177, particularly the N-S and E-W routes shown on the map for this site.
- There is significant demand for industrial space, so the allocation should require replacement industrial capacity.

## **2021/ 22 Consultation Responses**

No further responses were received

### **Council Response**

- The allocation has been amended to strengthen the need to respect the historic context of the site and the merits of the existing buildings and boundary wall, and to respond to the architectural quality of the adjacent historic terraces.
- The allocation has been amended to strengthen the need for some east west permeability for pedestrian and cycle routes and links to other routes in the area
- This site is allocated for mixed use, including employment uses. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work.

## **Policy IDS19 - Land to rear of the British Library**

### **2020 Consultation Responses (Email)**

#### Proposed uses

- The library and its development partner share a vision for the site to be somewhere that can provide commerce, knowledge and research facilities within the area around King's Cross.
- Partnership has involved active discussions to ensure the needs of the Library can be appropriately addressed on the site.
- Support the Council's decision to include this site itself within the emerging Site Allocations DPD as it recognises the development potential this site possesses. Agree with its potential to deliver mixed-use development that 'complements and supports the expansion plans and future service needs of the British Library.
- Development "should" instead of development "must".
- The Library supports the development requirements set out in clause a); b); e) and h). The Library shares the Council's vision of a socially inclusive development that is of exceptional design and mindful of its historic context and significant location – both internationally and as part of the Knowledge Quarter.
- Clause h) can be fulfilled by the existing single service access via Midland Road.
- Considered at present that the additional entrance on Ossulston Street is listed as a requirement and that this is overly prescriptive for a policy of this nature.

- Supportive of the Council's vision that the site should be brought forward for a mixed use development that complements and supports the expansion plans for the British Library including cultural, commercial and community uses.
- Request the use of development "should" rather than "must".

#### Proposed uses/Community space

- The Library supports the inclusion of measures that create a strong social value, but the policy as it is currently worded places too much emphasis on "flexible community space/s" as a means of delivering. It is agreed these spaces can provide strong social value; the current emphasis suggests this should be included in order to deliver it.
- Recommended re-wording of part d of the policy that highlights flexible community space/s as one way in which "strong social value" can be generated by the development to: "Make provision for a range of measures that provide strong social value from the development including for example, flexible community space/s that could be used for meetings, social enterprise, information training and learning, pop-up cafes/shops and exhibitions, for example.
- Two alterations are proposed regarding routes – the removal of the central features crossing through the site in Figure 10.19 (further outlined in response to Q132); and the following revisions to clause g): Complement, expand and enhance the role of Dangoor Walk as a pedestrian/cycle route. Creating new routes and spaces through/within the site to make it a more inclusive part of the city and integrate it into the local area.
- Considered inappropriate for the site to deliver self-contained homes and doing so would restrict the use of the land which would contradict the drive towards innovation and knowledge uses. This site is a nationally important economic cluster and the Library does not consider that residential development would represent best use of this strategically important brownfield site in this location. Recommended that the part (i) of this policy should be removed.
- Paragraph 10.184 would also need to be amended to reflect the removal of part (i).

#### The use and function of the roof space

- In response to part f which states that consideration should be given to roof spaces providing a public asset to support the library's role as a welcoming space for everyone, it is anticipated that there will be a number of operational demands for the roof space, thus these could be integrated with green infrastructure subject to space available, however making the roof space publicly accessible may be incompatible with other demands on the roof space and the wider security considerations for the Library.
- Use of the roof as a publicly accessible space could restrict the potential for the roof to include sustainability and biodiversity features which will be explored during the design evolution of any redevelopment scheme.

### Public realm, green infrastructure and play

- A core element of the British Library's vision is to create a new front door to the Library to ensure it becomes a more open and welcoming place for everyone. The majority of the ground floor at the site, both internally and externally, will be open to the public and will be considered a significant asset.
- Part (f) of the policy should recognise and balance the two policy priorities of providing public spaces and increasing biodiversity and sustainability measures at the site. We therefore request that part (f) is reworded to "consideration should be given to how roof spaces can support this role of integrating green infrastructure into the fabric of the development".
- Part (f) also states that opportunities for everyone to play should be included. It may be possible to provide informal, 'play on the way' type spaces into the public realm, however, it will not be appropriate to deliver formal play space at the development due to the site constraints.
- Wording at part f. whilst we support roof gardens, as long as they respect the privacy of neighbouring homes, local residents are most likely to use green and open spaces that are fully accessible and at ground level.

### Links and Connectivity

- Are supportive of providing links to and access from communities on all sides.
- In order to ensure that there is flexibility in the policy's approach to delivering links to and access from communities on all sides, we request that part c of the policy is reworded as "Ensure that the main entrance to the public Library facilities are visible from the St Pancras Station entrance on Midland Road. Consideration should be given to additional entrances from Ossulston Street which could support links to and public access from communities on all sides".

### Public realm, routes through, accessibility and connectivity

- The proposed potential route shown in diagram Fig. 10.19 would not align with the Library's key design driver for the configuration of the built form and public realm at the site which is to deliver a new and open and free flowing ground floor for the library. It is anticipated that the design will provide improved routes through the site but not in the location shown on the diagram. We request that the route is removed from the diagram.
- The intention is to create an integrated, continuous and contiguous public realm at ground floor level which is inclusive and accessible for all users whilst delivering biodiversity and sustainability benefits. These aims will deliver activity and vitality, animating an unused part of central Camden and the heart of the Knowledge Quarter. This approach will also complement the aspiration to enhance the Dangoor Walk as a key route in the future as set out within existing Camden guidance for the area.
- It is requested that part (g) is amended in the following way "create new routes and spaces within the site to make it a more inclusive part of the city and integrate it into the local area".
- Figure 10.19 shows a 'a new public route' through the centre of the site with a 'new improved public space' located at the heart of the site however it is

considered that these are not appropriate for the site and do not align with the Library's requirement to deliver a single unified ground floor plane.

- The route proposed in Fig. 10.19 would dilute the ability to transform Dangoor Walk area into a vibrant, active and safe route.
- We request that Figure 10.19 is amended to show a perimeter route for public realm and route improvements around the site. This would not preclude the site from delivering an integrated public realm inclusive and accessible to all users.
- It is considered that the boundary in Fig. 10.19 is appropriate in the context of Policy IDS19.

#### Housing provision

- Whilst the need for more homes in Camden is fully understood, it would be inappropriate to require development at this key site located in the heart of the Knowledge Quarter to deliver permanent self-contained homes on-site. Residential use would not be commensurate with the site allocation aims and would restrict the use of the land as an extension to the library for everyone to enjoy and for innovation and knowledge use which would drive against both the site's recognised location at the very heart of the Knowledge Quarter and the need to maximise its potential to contribute to the emergence of this unique, and nationally important, economic cluster.
- We consider that the policy should make clear that on-site housing will not be required on this site and that part (i) of the policy (which requires a contribution towards the provision of self-contained homes) should be removed.
- It is not considered reasonable or appropriate to require housing to be delivered on-site in this location. The delivery of on-site housing on the site would be prejudicial to its function as a centre for innovation and knowledge of national and international importance.
- Wording at part (i.) suggests a financial contribution could be acceptable. We would like to see some homes as part of any development, including social homes.

#### Transport and infrastructure priorities

- It should be noted that any development on this site will also need to deliver and fund the provision of Crossrail 2 infrastructure and fund the delivery of the new library facilities.
- The policy expectations of Policy IDS19 should be seen within a flexible framework to enable and appreciate the challenges of delivering Crossrail 2 infrastructure on site.
- We support the cycling related elements of Policy (IDS19) especially point (g).

#### Heritage

- Wording at b. is confusing, given the conservation centre is likely to be demolished. Consideration needs to be given to the impact of development on existing buildings around the site. In particular, Grade I listed British Library, Grade I listed St Pancras Station and hotel and Grade II listed Ossulston Street Estate.

## **2020 Consultation Responses (Commonplace)**

1 respondent

- Disagree with the proposed uses. Thought this site was allocated for Crossrail 2 construction. Ensure that any policy/development at the site does not prejudice the development of Crossrail 2.

## **2021/ 22 Consultation Responses (Email)**

- Following the adoption of the new London Plan in March 2021 we consider that the Knowledge Quarter Innovation District should be identified as a location that may be suitable for tall buildings as a geographically focussed key economic centre within central London and the CAZ.
- Regarding the New London Plan policy on tall buildings, the Library feel that the council should determine what constitutes a 'tall building' and should determine where appropriate locations for such buildings should be within the borough. The Library consider that Policy IDS 19, should confirm that the site may be suitable as a location for tall buildings, subject to meeting other requirements of the Plan.
- A significant amount of work done for a forthcoming application which include visual impacts, functional impacts and environmental impacts have all been clearly assessed in line with a detailed design proposal for the site and it is considered that this site is capable of supporting a building of height in this location.
- It is important that the site allocations support and do not inhibit development. Developing around TfL's infrastructure is inevitably a complex and costly exercise. These sites are some of the most sustainable in London and so their development potential should be optimised.
- The Library remain supportive of the current proposed allocation for cultural floorspace and knowledge quarter uses in the current draft of the Plan which is considered in line with the planning application proposals that will be submitted to Camden imminently.

## **2021/ 22 Consultation Responses (Commonplace)**

2 respondents made comments identifying the following:

- Climate change should be the main focus of the policy (2 responses)
- Other priorities include building height and massing, design and heritage matters.

### What should be included in the policy?

- The existing extension to the British Library (the conservation centre) should not be demolished as this will result in a large amount of unnecessary greenhouse gas emissions and the emission of embodied carbon. (2 responses)
- The existing extension building should be retained.
- More green space should be included in the wider area as the roadway is a toxic environment and needs more street trees. The area is already short of green open space, more is currently being lost to development: retaining and improving open space should be a priority here. (2 responses)



## **Council Response**

- The allocation of this site in the draft new Local Plan recognises that planning permission and listed building consent have been granted for a new building for use as a library, galleries, learning, business and events space and retail and commercial spaces.
- Any flexibility in the policy wording is introduced through specific criteria and therefore it is not considered necessary or appropriate to remove the word 'must' from the start of the policy wording.
- The requirement for the single access point on Midland Road has been removed from the allocation in the draft Local Plan.
- The additional entrance on Ossulston Street is considered to be a key objective for connecting the site to the surrounding communities and is therefore retained as a requirement.
- The wording of the allocation has been amended to clarify that the measures to provide social value included are examples of how such benefits could be delivered.
- The allocation expects development to maximise opportunities for integrating green infrastructure and include a range of inclusive, easily accessible public open and green spaces.
- The allocation requires 'consideration' of how the roof spaces could support the easily accessible public open spaces to enable all relevant matters as to whether this is deliverable to be considered.
- Proposed routes are not shown on the maps included in the draft Plan.
- The allocation notes that a contribution to the delivery of housing will be expected from this site having regard to relevant Local Plan policies. The extent of any housing requirements on-site (or alternatively off-site) will be considered in the light of competing land use needs, other priorities and relevant policy criteria, including the extent to which proposals are publicly funded and support the investment plans and operational needs of the British Library.
- The allocation recognises the requirement to ensure that Crossrail 2 infrastructure is incorporated into any design.
- The allocation in the draft new Local Plan expects appropriate consideration to be given to the impact of development on existing buildings on the site.
- This site is not identified in the Camden Building Heights study as a location suitable for a tall building (i.e. a building exceeding the tall building threshold for the area of 30m). The height of any proposed development will be assessed against relevant local plan policies.

## Policy IDS20 - Other Development Sites

Site Ref	Address	Summary of comments received
IDS20 a)	Middlesex Hospital Annex -44 Cleveland Street	No responses received in either consultation.
IDS20 b)	1-5 Hanway Place and 6-17 Tottenham Court Road	No responses received in either consultation.  <b>Council Response</b> This site is not being included in the draft new Local Plan as an allocations as it is no longer expected to come forward for development
IDS20 c)	Arthur Stanley House	<u>2020 Consultation</u> <ul style="list-style-type: none"> <li>The planning permission/ s106 secures a 600 sqm GP surgery as shell and core space at an open market rent for D1 use, and is unlikely to be affordable. A site is needed to consolidate leasehold interests in the area, subject to further discussions with Westminster City Council and Central London CCG.</li> </ul> <u>2021/ 22 Consultation</u> No further responses were received  <b>Council Response</b> This site is no longer included as a site allocation as development is complete.
IDS20 d)	Cambridge House	No responses received in either consultation.  <b>Council Response</b> This site is no longer included in the Local Plan Site Allocations as development is substantially complete on site.
IDS20 e)	Ifor Evans Halls of Residence, 109 Camden Road  Now referred to as UCL Camden Campus, 109 Camden Road	<u>2020 Consultation</u> <ul style="list-style-type: none"> <li>This site is surrounded by Conservation Areas - Bartholomew, Rochester and Camden Square. Max Rayne House at the rear of the site grossly destroys the roofline of Rochester Square. The site is already intensively used and could not be extended to 300 rooms. This proposal should be removed from the allocations, and no further development should be undertaken. At the western end of the site there is a students' garden/ nursery and tennis court, which maintains an important view from the Rochester</li> </ul>

		<p>Conservation Area with mature trees. It is especially important to retain the rear garden which could – for example – become a small set of allotments.</p> <p><u>2021/ 22 Consultation</u></p> <ul style="list-style-type: none"> <li>• The proposal for 300 additional student places at this site is likely to harm the environment of an area already burdened by traffic, tarmac and tall buildings. The site is already congested with high numbers of students in the middle of a residential area. Existing recreational space on the site should be retained as this gives light and air to the surrounding area. The development is likely to be of modest intrinsic quality and provide student/ tourist accommodation that does nothing to relieve the pressure on private housing.</li> <li>• This site will be known as UCL Camden Campus, 109 Camden Road. We welcome the allocation for 300 additional student bedspaces, and consider that there should be no policy restriction on the potential for a full redevelopment of the site, thus the draft wording should be retained. UCL has commissioned a study into the redevelopment potential of this site which will be discussed with Council officers in due course.</li> </ul> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• Development of this site is expected and therefore it is appropriate for it to be a site allocation.</li> <li>• The allocation in the draft new Local Plan now includes specific policy requirements for the site. It includes criteria to safeguard existing open space and protect existing allotments.</li> <li>• The indicative residential capacity has been reduced to 180 rooms, based on site capacity work for a scheme that involves extension and new construction, not demolition.</li> <li>• The impact of any development scheme will be assessed against the allocation and all relevant Local Plan policies.</li> <li>• The site name and site boundary has been amended to include all the UCL accommodation.</li> </ul>
IDS20 f)	Jamestown / Arlington Road depot	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• The Trust is seeking development plan support to deliver a new facility for its internationally renowned services. The existing premises on Belsize Lane and the adjacent Portman Clinic are</li> </ul>

		<p>not well-adapted to current service delivery and training needs and the building on Belsize Lane is life expired. The Trust has looked at refurbishment and redevelopment options and concluded that an off-site solution with a new building would be the most viable option. The depot site is a strong candidate as it could cater for the needs of existing users of the Trust's services and staff.</p> <ul style="list-style-type: none"> <li>• Safeguarding the site for the uses mentioned would cause difficulties for the Trust – there is no need for the Council to exercise a strong level of control over the existing use – the depot is either surplus to requirements or alternative accommodation can/is being found elsewhere.</li> <li>• Will consider residential in the mix of uses but an indicative capacity should not be stated at this time – the Trust's other landholdings provide flexibility for the delivery of new homes.</li> <li>• Welcome proposed uses of light industrial / depot – the site allocation should be clear what quantum of industrial capacity is to be re-provided.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• The NHS Trust are no longer pursuing a development proposal or interest in this site and the site has been sold to an alternative party.</li> <li>• The allocated uses no longer include a depot as this service has been reprovided by the Council elsewhere. Light industrial use is retained as an appropriate use.</li> <li>• It is not considered necessary or appropriate to set out a detailed quantum of light industrial capacity. The precise nature of a development, including the quantum of particular uses, will emerge through detailed design work when development schemes are formulated and must be in accordance with relevant policies in the Camden Local Plan and the London Plan.</li> </ul>
IDS20 g)	Lot 1 Hadley Street	No responses received in either consultation.
IDS20 h)	BP Petrol Station, 104A Finchley Road	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• Object to the allocation for housing and office purposes due to the impact on surrounding streets due to the loss of the petrol station and so the site should be removed.</li> </ul>

		<ul style="list-style-type: none"> <li>• If the site allocation is retained, the inclusion of super fast electric charging should be included to help encourage the shift from petrol to electric vehicles.</li> <li>• The proposed uses are questioned and consider office unlikely to be pursued. A planning application is expected to be submitted prior to the next stage.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• The allocated uses have been amended in the draft new Local Plan to refer to self contained homes and commercial uses, reflecting the site's town centre location.</li> <li>• Any planning application will be assessed against the relevant Local Plan policies including policy T4 which sets out the approach to electric vehicle charging points.</li> <li>• A planning application has been submitted on this site but was determined at the time of writing.</li> </ul>
IDS20 i)	Branch Hill	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• No detail is provided for the planned development at Branch Hill.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• This site is not being included in the draft new Local Plan as it is under the residential capacity being used for allocation.</li> </ul>
IDS20 j)	113a, 115 and 117 Wellesley Road - Bacton Low rise	No responses received in either consultation.
IDS20 k)	Queen Mary's House, 124 Heath Street	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• Disagree with the proposed use and the number of homes proposed. Existing NHS worker housing on the site should be protected, and the priority use should be NHS worker accommodation, in keeping with the specific housing types proposed under IDS20e (student accommodation) and IDS20s (assisted living). Otherwise the allocation should be deleted. The proposed number of units</li> </ul>

		<p>would make it much more densely populated than any other part of Hampstead, and should be reduced.</p> <ul style="list-style-type: none"> <li>• The 150 homes capacity figure appears to assume demolition of all existing buildings as shown in the 2018 Knight Frank marketing brochure, and a 50% increase in floor area. These buildings are acknowledged as positive contributors to the conservation area, and any demolition would require clear and convincing justification. The capacity figure should be revised downwards to reflect the existing floor area.</li> <li>• No explanation is given for the 150 homes indicative capacity, but we consider it would require demolition of the existing buildings. The buildings contribute to the Conservation Area, are in good physical condition and are in a sensitive location adjacent to Hampstead Heath MOL, and should be re-used. Any capacity figure will be treated as a minimum by developers. The site would also be suitable for other uses, the appropriate uses and density should be democratically considered. It is premature to define the use and density of a site before a planning application is considered – so proposals should not go beyond suggesting housing as a possible use for the site.</li> <li>• The site has been identified as surplus to healthcare requirements and can be disposed of by the Trust. There is existing staff accommodation on the site, and the Trust has made clear that this accommodation would be replaced if it is disposed of or affected by redevelopment. We think the site is unlikely to be suitable for commercial uses, but would be suitable for Class C2/ non-self-contained accommodation, Class C3, or a combination of these, and the site allocation should provide for this. Housing to meet particular needs, such as the needs of older people, would contribute to meeting housing targets, and release self-contained homes for other occupiers. We consider the estimate of site capacity to be realistic. We are unable to check the accuracy of the site boundary as the maps are at a small scale and lack a detailed base map.</li> </ul> <p><u>2021/ 22 Consultation</u></p> <p>No further responses were received</p>
--	--	--

		<p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• The indicative capacity for this site has been reduced in the draft new Local Plan, reflecting a development scheme based on the retention of existing buildings rather than demolition. Any demolition would need to be fully justified in accordance with Local Plan policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings.</li> <li>• The allocation has been amended to require the retention of the 1920's building.</li> <li>• The priority use of the Local Plan is self contained housing to meet Camden's identified housing need and application for specialist housing would be assessed against Policy H6C.</li> <li>• The allocation requires the reprovion of the existing affordable housing floorspace</li> <li>• The map provided with the allocation now clearly shows the boundary.</li> </ul>
IDS20 I)	Hampstead Delivery Office, Shepherd's Walk	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• The site is in Hampstead Conservation Area and adjacent to a biodiversity corridor. The indicative housing capacity of 45 homes amounts to a density of 107 homes per hectare, and we consider this to be a little too high for its context.</li> <li>• In view of the employment protection policies in the Local Plan and the evidence that Camden has put forward to support Article 4 directions, we propose that the site should be allocated for both residential and workspaces, including live/work units and spaces for start-ups and small businesses. This could reduce commuting and provide for workers who might otherwise not be able to afford to live in the area.</li> <li>• It is premature to define the use and density of a site before a planning application is considered. Consideration should be given to including a work component here and extending the adjacent environmental/ diversity corridor into the site. It would be difficult to achieve 45 dwellings on this site, but any capacity figure will be treated as a minimum by developers. Proposals should not go beyond suggesting housing as a possible use for the site.</li> </ul> <p><u>2021/ 22 Consultation</u></p> <ul style="list-style-type: none"> <li>• No further responses were received</li> </ul>

		<p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• The indicative housing capacity is based on an urban design assessment taking into account site context and constraints.</li> <li>• Any planning application would be assessed against all relevant Local Plan policies at the time of submission.</li> <li>• The site is within a predominantly residential area and the priority use of the Local Plan is for self-contained residential use. Residential use is therefore considered appropriate if the site becomes surplus to Royal Mail requirements.</li> </ul>
IDS20 m)	Former Charlie Ratchford Centre	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• Support the inclusion of the Charlie Ratchford Centre site as an Individual Development Site as believe there is opportunity to optimise housing delivery on the site further.</li> <li>• The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. On the information available to date, we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s.</li> </ul> <p><u>2021/ 22 Consultation</u></p> <p>No further responses were received</p> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>• Support noted. The site has been granted planning permission and is under construction.</li> </ul>
IDS20 n)	Land at Grafton Terrace and Maitland Park Villas	<p>No responses received in either consultation.</p> <p><b>Council Response</b></p> <p>This site is no longer included as an allocation in the draft new Local Plan as development of the site is substantially complete.</p>
IDS20 o)	Highgate New Town Community Centre	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• Any development should provide community facilities at least equivalent to those currently present in terms of quality, space and range of uses.</li> </ul>



		<ul style="list-style-type: none"> <li>Community Centre should also remain a facility run by and for the benefit of the local residents, and the site should remain open to the public, with a right of way through the site.</li> <li>The current scheme would constitute overdevelopment of a very constrained site; the scale and mass of the development would disrupt an area of low-rise terraced housing; it would have an adverse impact on the listed buildings at 22-32 Winscombe Street; there would be inadequate access; and there is inadequate provision of affordable housing.</li> <li>The indicative housing capacity of 39 additional houses is too high.</li> <li>Development should also provide the maximum amount of affordable housing provided for in the Local Plan policies and the Dartmouth Park Neighbourhood Plan and should make provision for intermediate housing, any residential use should be designed to be compatible with, and not impact adversely on community uses.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b> This site is no longer included as an allocation in the draft new Local Plan as development of the site is substantially complete.</p>
IDS20 p)	246 - 248 Kilburn High Road	No responses received in either consultation.
IDS20 q)	Abbey Co op Housing Site, Casterbridge and Snowman House	<p>No responses received in either consultation.</p> <p><b>Council Response</b> This site is no longer included as an allocation in the draft new Local Plan as development of the site is substantially complete.</p>
IDS20 r)	1 Hampshire Street	<p>No responses received in either consultation.</p> <p><b>Council Response</b> This site is no longer included as an allocation in the draft new Local Plan as development of the site is complete.</p>
IDS20 s)	1-12 Ingestre Road	<u>2020 Consultation</u>

		<ul style="list-style-type: none"> <li>• Welcome the identification of this site for 50 'assisted living' units. Allocating sites for older people is supported by the NPPF, national Planning Practice Guidance, the London Plan, and the Camden Local Plan. It is also consistent with the growth in the population aged 65 and over, and has benefits in terms of health and wellbeing, The site is deliverable, available for development now, realistically achievable, and subject to a planning application for 50 assisted living apartments for over 55's.</li> <li>• Welcome the continued use of this site to provide 50 units of assisted living housing.</li> <li>• We do not envisage any infrastructure concerns in relation to water supply or the wastewater network, but the developer and local authority should liaise with Thames Water to advise about phasing.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b> This site is no longer included as an allocation in the draft new Local Plan as the additional amount of residential expected is under the threshold for inclusion.</p>
IDS20 t)	Eastman Dental Clinic	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>• The plan does not indicate that this site and 330 Gray's Inn Road (IDS15) are both available as a consequence of the University College Hospital's development of replacement facilities in Huntley Street.</li> <li>• Welcome the inclusion of student housing in the allocated uses, this will contribute to meeting local and strategic need.</li> </ul> <p><u>2021/ 22 Consultation</u> No further responses were received</p> <p><b>Council Response</b> This site is no longer included as an allocation in the draft new Local Plan as development of the site is substantially complete.</p>

IDS20 u)	52 Avenue Road	No responses received in either consultation.
IDS20 v)	100 Avenue Road	No responses received in either consultation.
IDS20 w)	Barries House, 29 St Edmunds Terrace	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>Object to the inclusion of this site in the Site Allocations. This street is being over developed. A common approach should be agreed with Westminster for this street given its location on the border.</li> </ul> <p><b>Council Response</b></p> <p>This site is no longer included as an allocation in the draft new Local Plan as the additional amount of residential expected is under the threshold for inclusion.</p>
IDS20 x)	Central Somers Town	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>Object to the increase in indicative housing capacity from 136 to 153.</li> <li>Proposal provides no extra public open space and sees a scandalous loss of private open space, further increasing the demand on existing open space, during a time of unprecedented development in the area, will have a direct and negative impact on the health and wellbeing of existing residents.</li> </ul> <p><u>2021/ 22 Consultation</u></p> <p>No further responses were received</p> <p><b>Council Response</b></p> <ul style="list-style-type: none"> <li>Planning permission has been granted for this location and is development is under construction.</li> <li>The capacity reflects the number of homes that are still to be constructed.</li> </ul>
IDS20 y)	King's Cross Central	<p>No responses received in either consultation</p> <p><b>Council Response</b></p> <p>This site is no longer included as an allocation in the draft new Local Plan as development of the site is substantially complete.</p>

IDS20 z)	Liddell Road Industrial Estate	<p><u>2020 Consultation</u></p> <ul style="list-style-type: none"> <li>Support the requirement for light industrial use in the allocation, but should specify the quantum to be reprovided.</li> </ul> <p><u>2021/ 22 Consultation</u></p> <p>No further responses were received</p> <p><b>Council Response</b></p> <p>This site is no longer included as an allocation in the draft new Local Plan as site has planning permission and is being developed.</p>
----------	--------------------------------	---

## **General comments**

Some comments received were not site specific or related to all sites. These are summarised below.

### **Utilities**

#### **2020 Consultation Response**

- New development should be co-ordinated with the infrastructure it demands and take into account the capacity of existing infrastructure.
- The web-based National Planning Practice Guidance includes a section on water supply, wastewater and water quality setting out that Local Plans should be the focus for ensuring that the investment plans of water and sewerage/wastewater companies align with development needs.
- Local reinforcement works (resulting from new development) for water and wastewater networks will be delivered by Thames Water and funded through its Infrastructure Charge for each new property connected
- Thames Water encourages developers to engage with them at an early stage in the development and planning process and to make use of Thames Water's free pre-planning service.
- Following a review of the SALP, National Grid has identified and mapped their assets within the plan area.
- 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 their assets.

#### **2021/ 22 Consultation Response**

- Upgrades to wastewater infrastructure will not be committed to until there is certainty of development coming forward to avoid abortive works

- To avoid adverse impacts such as sewer flooding or low water pressure, Thames Water will request phasing conditions to prevent occupation of a phase of a development until any necessary infrastructure upgrades have been completed. There will be an increased use of such phasing conditions where there has not been pre-application engagement with Thames Water.
- Electricity assets: Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify an exemption where, for example, the proposal is of regional or national importance
- The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
- Gas assets: High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ.
- National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

### **Council Response**

- We have engaged with Thames Water in developing the Local Plan and site allocation policies. This has included identifying available capacity in the existing network. Individual site allocations set out where enhancements may be required and additional information Thames Water may seek from the applicant.
- The draft new Local Plan makes reference to Thames Water's pre-application advice service.
- To assist with the future planning of infrastructure provision, the Council regularly shares information with utility providers about forecast levels of growth and locations where major development is expected to come forward.
- The Local Plan's site allocations identify where occupation may need to be phased in tandem with the delivery of enhancements to water infrastructure. This will be managed through use of planning conditions and where these have been requested by Thames Water.
- National Grid are currently a consultee for all development plan documents and relevant planning applications impacting on their assets.
- Development sites in the Local Plan would not have any impact on overhead power lines.
- We would expect applicants to engage with National Grid where their proposals are likely to have a material impact on assets used for transmission of electricity or gas.

### **Open space and waterways**

## **2020 Consultation Response**

- Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport, business, tourism, a focal point for cultural activities, and increasingly a space where Londoners are choosing to live.
- We would welcome ongoing engagement with the Council and developers about the wide range of opportunities that our waterways provide.
- We own and manage the Regent's Canal and towpath. It has an important role in the history of the area and is a key pedestrian and cycle route and greenspace. London has also experienced a rapid growth in the number of people cruising the waterways and living in boats.

## **2021/ 22 Consultation Response**

- The Regent's Canal and its towpath are often busy throughout the areas covered by the site allocations, and have become increasingly so since the redevelopment of key sites such as King's Cross and Camden Town. We would welcome support through development contributions and local adoptions to mitigate the impact of the increased numbers of visitors to the canal from development
- The Council could demonstrate greater ambition for increasing the amount of green space in Camden. In particular, we would like the Council to create new parks in areas of the borough with not enough green space (such as Holborn and Covent Garden) by converting 'grey space' into 'streetparks'.
- The Council should ensure any new housing developments or estate regeneration 'infill' schemes do not leave residents with inadequate provision of green and communal open space.

## **Council Response**

- The Regent's Canal/Grand Union Canal is designated a Site of Nature Conservation Importance, Open Space and Green Corridor in the Local Plan. Individual allocations of sites adjacent to the Canal respond to this, setting out expectations relating to biodiversity, lighting, access etc..
- Draft new Local Plan Policy SC3 – Open Space sets out the Plan's approach to securing contributions towards new and enhanced open spaces.
- Draft Plan Policy NE1 – The Natural Environment states that the Council will work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath.
- The Council consults the Canal and River Trust on applications impacting on the canal and towpath.
- The draft new Local Plan's overarching approach to open space is set out in policy SC3 - Open Space. Individual site allocations set out to expectations regarding open space as relevant.
- The Council recognises the value of 'greening the grey' and has already brought forward greening of hard surfaces and pavements in various locations. The funding of such works has often been facilitated by planning contributions secured through section 106 agreements. As part of the Council's West End Project, a new park has recently been opened at Alfred Place Gardens.

- Draft Plan policy SC3 seeks to safeguard open space on housing estates while allowing flexibility for the re-configuration of land uses where significant public benefits have been demonstrated, in particular for residents of the estate.

## **Healthcare**

### **2020 Consultation Response**

- The Infrastructure Study (part of the SALP evidence base) should identify funding requirements, including use of S106 developer contributions to mitigate site-specific impacts and the use of Community Infrastructure Levy to address cumulative impacts. The Study looks at healthcare which it defines as primary care services, social care, public health and ambulance services but this definition excludes hospital and community care services provided by NHS Trusts
- This section will need to be kept under review as strategies and new models of care are implemented, notably primary care networks, out of hospital care and move towards an NCL Integrated Care System
- Projects/plans: as well as funding, many are contingent on the relocation of services and the redevelopment/ sale of existing NHS sites
- Welcome the statement that “any new on-site health facilities provided by developers would normally need to be provided at affordable rates”. A shell and core facility provided at open market rents should not be considered as a S106 obligation.
- To deliver new capacity, Community Infrastructure Levy funds will be needed as there is a significant funding gap.
- The CCG has identified opportunities for the redevelopment and optimisation of existing sites including Hunter Street Health Centre. Provision/capacity needs to be reviewed in Bloomsbury as well as the Swiss Cottage area, King’s Cross/Somers Town, Chalk Farm and West Hampstead. Additional capacity is needed for the Hampstead Group Practice.
- As part of its plans to transform mental health services, Camden and Islington NHS Foundation Trust have identified opportunities for new health and wellbeing hubs at Camden West (02 Centre), Daleham Gardens Health Centre and 4 Greenland Road, Camden Town

### **2021/22 Consultation Responses**

No further responses were received

### **Council Response**

- Draft new Local Plan Policy SC1: Improving health and wellbeing supports the provision of new or improved health facilities, in line with the North Central London’s Integrated Care System and NHS England’s requirements.
- Policy SC2 Social and Community Infrastructure requires contributions towards supporting existing or providing for new facilities from developments that result in additional need for community facilities, such as those for health. The Local Plan does not set out the Council’s approach to the collection or spending of the Community Infrastructure Levy.

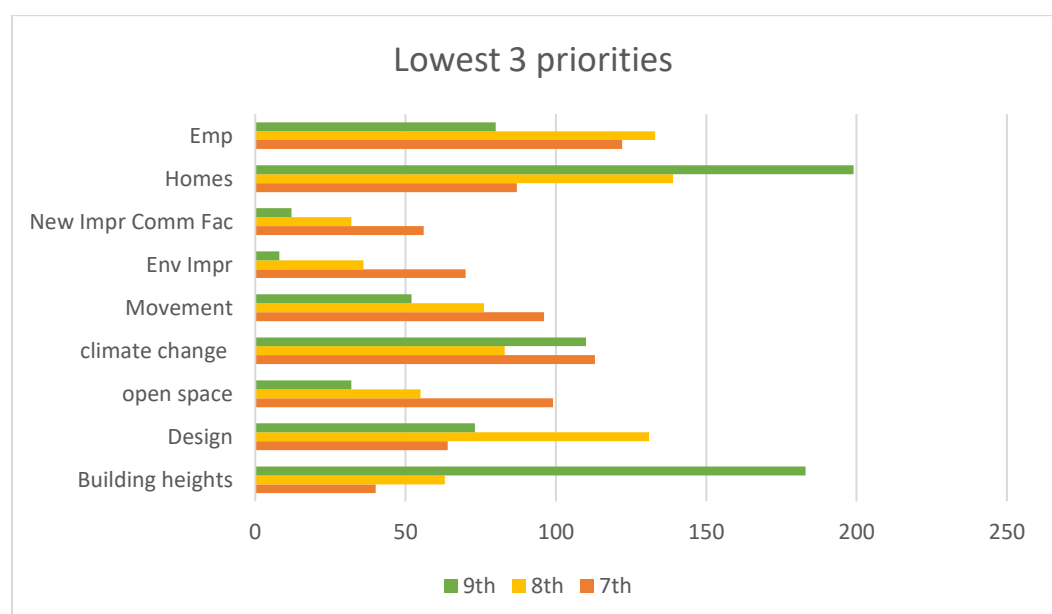
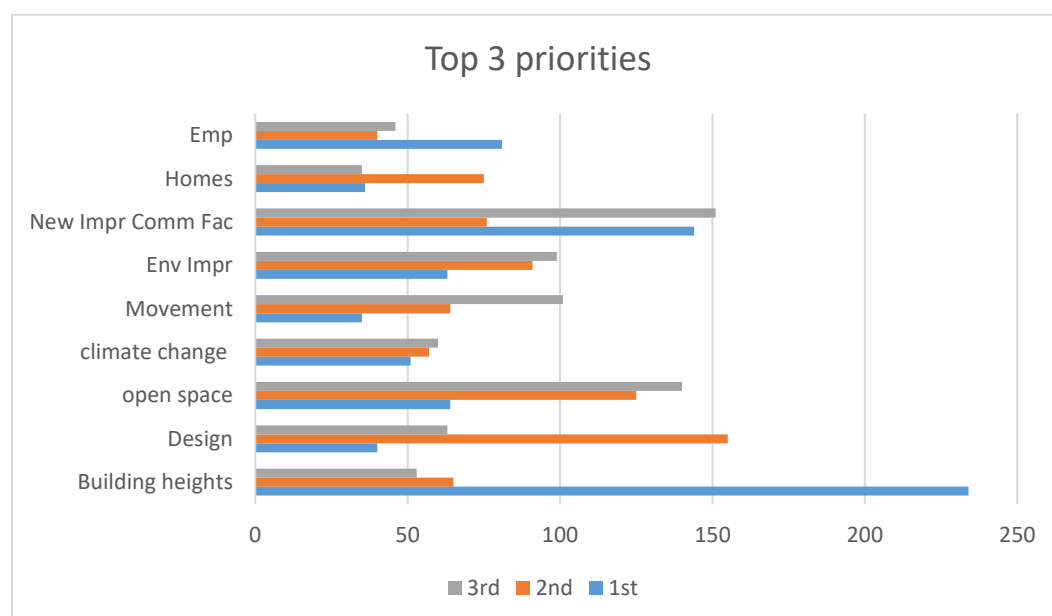
- The draft Local Plan Infrastructure Schedule identifies health infrastructure priorities. This was developed through involvement with local NHS representatives. Individual site allocations include reference to health facilities where appropriate.
- The Council has regular engagement with NHS health and care providers to ensure we have an up-to-date understanding of infrastructure needs.



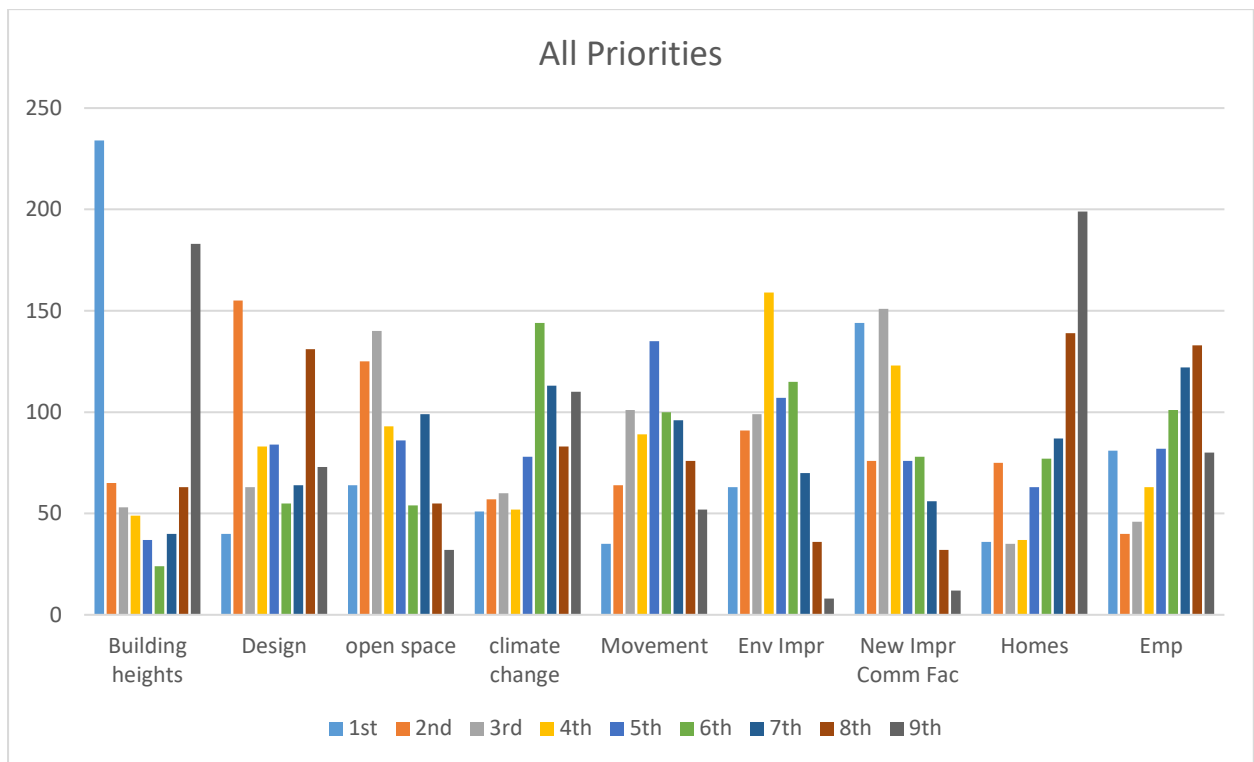
## Appendix 1 - Summary of Commonplace questions from 2021/22 Consultation for the West Hampstead Growth Area policy WHI1

### Question 1 - What development priorities do you think are most important in terms of this area policy?

753 people answered this question and set out their identified priorities in order of importance. The results are detailed below.

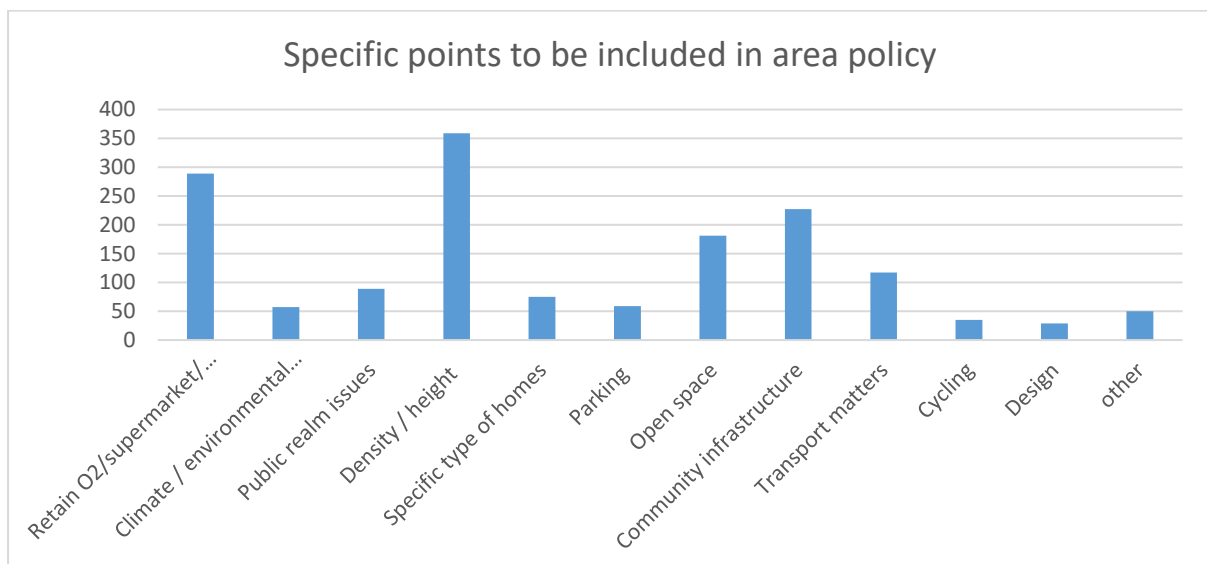


The results show building heights, new community facilities and employment opportunities as being the most important development priorities to consider. These points are expanded on in later questions. The lowest ranked priorities included provision of homes, with building heights second lowest.



**Question 2 - What specific points (related to the development priorities) do you think should be included in the area policy**

574 people responded to this question raising approximately 1500 comments.



Specific comments are summarised below:

**Density and height (359 comments)**

- No high rises should be allowed

- Maximum height limit should be specified. Comments range from a max 3 storeys up to 10 storeys
- Only low rise buildings should be allowed
- Density should be limited due to impacts on social and economic infrastructure
- Area will feel overcrowded
- High rise buildings lead to detrimental impacts on the area and people's mental health
- Density is too high and should be significantly reduced
- More space is needed around buildings
- High rise buildings are out of character with the area and buildings should reflect the adjacent conservation areas
- Tall buildings will result in loss of daylight/ too much shade and obstruct views

#### O2, supermarket (289 comments)

- A significant number of the responses supported the retention of the large supermarket
- Retain an affordable supermarket
- There is nowhere else with such ease for shopping for families and elderly people
- Loss of the supermarket would result in increase in cost of living and pollution
- Retain the shops, restaurants and Homebase
- Retain the gym and swimming pool
- Retain the entertainment facilities such as the cinema
- The community / social aspect of the O2 is important
- Opportunities of O2 as a social gathering space

#### Community Infrastructure (227 comments)

- Existing infrastructure is inadequate for an increased population
- More health / doctor / dentist/ hospital facilities are needed
- More school places are needed
- A detailed impact on social and community facilities should be required
- Multi purpose community spaces should be provided
- Facilities for youth / community support and elderly people should be provided
- Public seating should be included
- Community led indoor and outdoor space
- Significant upgrades to the general infrastructure for water, sewage, electrical, drainage etc. is needed
- Create communities where living, recreation and health are in balance
- Provide more balanced communities / public space on ground floors to encourage footfall and balanced communities

#### Open space (181 comments)

- Majority of responses wanted additional open green space
- Spaces should be accessible for the whole community
- Include children's play areas
- Welcoming spaces for people to socialise and relax in

- Use native trees and plants to assist with facilitating wildlife movement
- Green spaces should link up amenities

#### Transport (117 comments)

- Step free access at the tube stations
- Improve the integrations between the three West Hampstead stations
- Ensure Finchley Road station is improved
- Improve the stations' capacities, entrances, waiting facilities
- Improve public transport given the large increase in number of people in the area
- Ensure no impact on already bad road traffic in the area
- Improve the roads as traffic will increase including deliveries

#### Public realm (89 comments)

- Safe pedestrian routes are a clear priority
- Concern is expressed regarding the need to improve West End Lane, Blackburn Road and Finchley Road
- Existing pavements are already overcrowded
- Improvements are needed to Billy Fury Way and Granny Dripping steps
- Provide more and better pedestrian routes
- Improve safety of routes for all and particularly women / girls / families and young people
- Improve the existing underpass of Finchley Road and make it fully accessible for disabled people

#### Housing (76 comments)

- More affordable housing is needed for families and key workers
- More housing is not needed in this area and should be provided elsewhere
- 50% affordable housing must be provided
- Priority should be given to social housing, shared ownership, help to buy
- Local people should be given priority
- Properties should not be sold to overseas investors
- Provide housing for different-sized living groups, according to age and stage of life, needs of large families, young singles, supported living for people with disabilities, elderly, etc. to help create a more diverse community
- Homes with access to gardens / outdoor space / balconies
- Whole site should be for rent, not for sale
- Allow space for home working

#### Parking (59 comments)

- Retain car parking on site as it restricts access for less mobile / elderly people
- Parking is essential for the supermarket users, as difficult for families, elderly people and those less able to use public transport or cycle
- Electric charging points should be included
- Residents need parking for visitors and trade people

#### Climate and the environment (57 comments)

- Sustainable building design should be a priority
- Consider passivhaus building regulations
- New homes provided with low embodied carbon construction (e.g. medium height with timber frames)
- Retain and do not demolish the O2 centre to reduce carbon emissions
- Demolishing the O2 is against the climate emergency
- Consider building materials careful and avoid concrete
- Include electric outlets on lamp posts, provisions for electric vehicle deliveries
- Consider the impact on air pollution
- A design panel should consider high architectural aesthetics respecting sustainability
- Protect existing trees and areas of wildlife, encourage green roofs, swift bricks, new trees

#### Cycling (35 comments)

- New and improved cycling routes should be provided
- Should be north south cycling connections as well as through the sites
- Separate cycle lanes

#### Design (30 comments)

- Development should reflect the heritage of the area including the adjacent conservation areas
- Ensure the development is human in scale and high quality
- Design codes should be included for different sub areas
- Billy Fury Way has GOT to be made safe. Lithos Road should link properly to this new development. Happy with any plans as long as we can access them

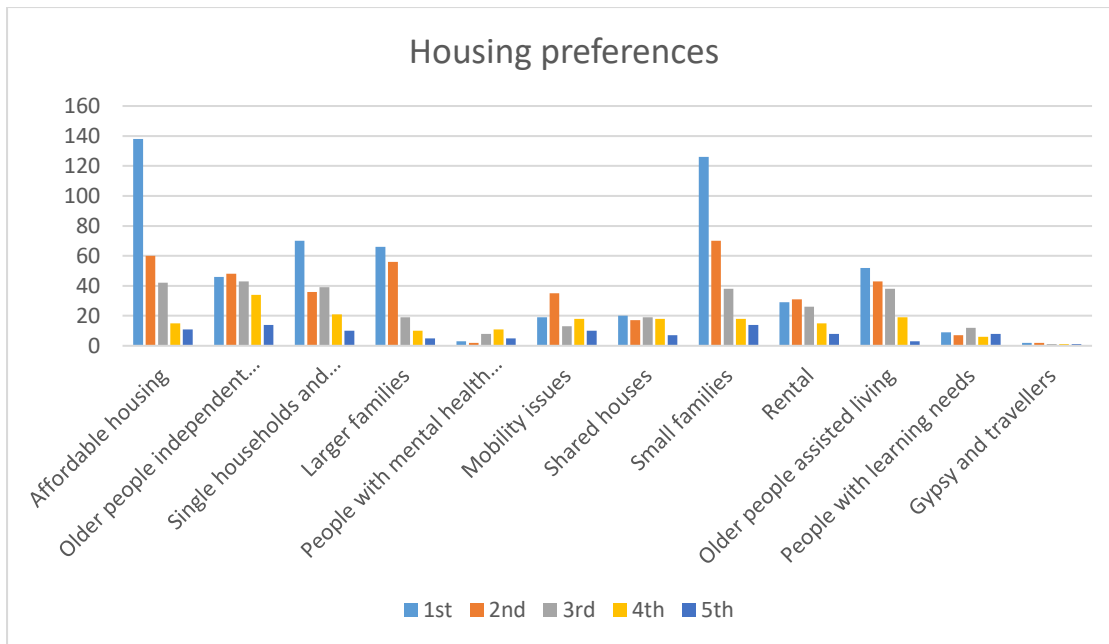
#### Other matters

- Reconsider the requirements given the changes to lifestyles arising from covid
- Changes should be for the benefit of the area not developers' interests
- Concern about the consultation process and lack of change since 2020
- Consultation questions are too narrow

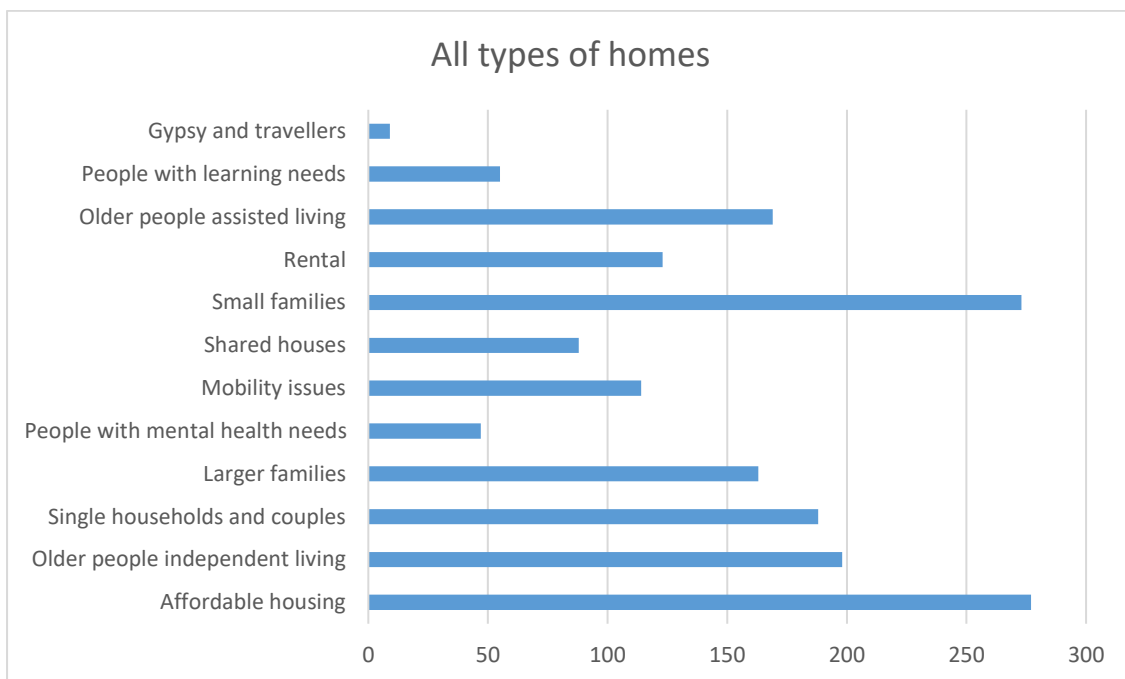
### **Question 3 - What type of homes do you think are most needed in this area**

642 people answered this question selecting a different number of types of homes in their responses.

There was support for a wide range of types of homes with the highest priorities being for more affordable housing and homes for small families in the area. Homes for singles and couples and larger families were the next two highest priorities as shown below.

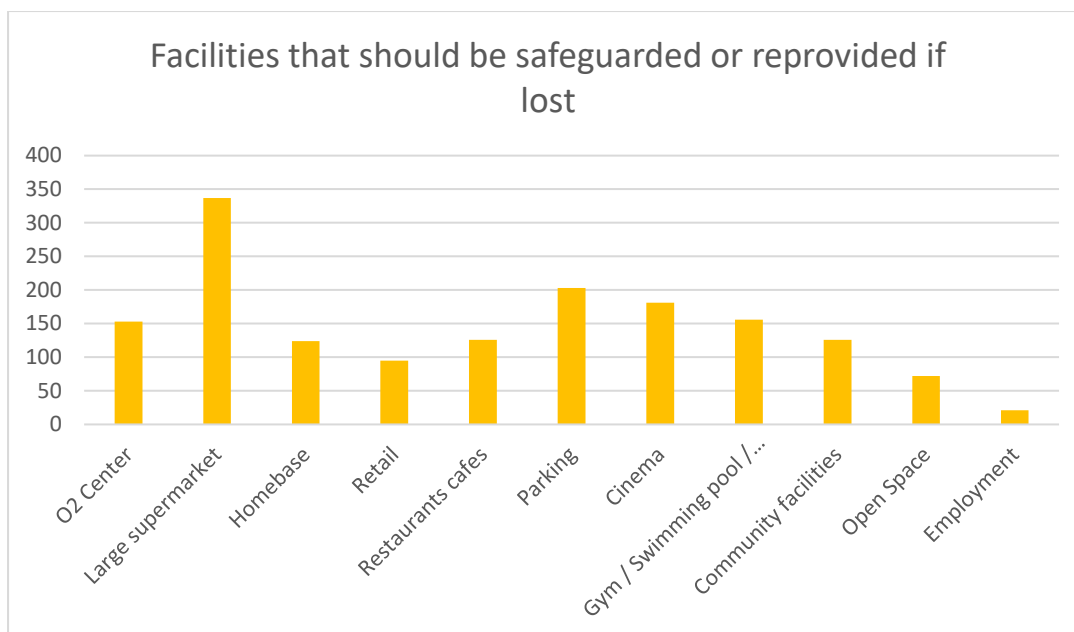


Affordable housing and single households were the highest priorities in terms of the number of times they were selected, with homes for older people's independent living being the third most selected type. A number of respondents indicated that they considered no more new homes were needed in the area.



#### Question 4 - Are there any existing facilities in the area that should be safeguarded or would need to be reprovided if lost?

608 people responded to this question.



Specific comments are summarised below:

#### Retain the O2 Centre (153 comments)

- The facilities and shops are of importance to the community
- Particularly important for mothers with young children, elderly people, and as a social meeting space

#### Large supermarket (337 comments)

- The importance of the supermarket being large and affordable was mentioned in many responses

Retail (95 comments) - there was general support for retaining a mixture of retail uses, including specific companies

#### Parking (211 comments)

- Vast majority of these responses raised parking in relation to the supermarket as a key facility to protect or reprovide. With particular provision needed for elderly people, disabled people and those with small children
- Several comments suggested that the parking provision should be reprovided underground
- The need for electric charging stations and bays was raised in several responses

#### Leisure facilities (156 comments)

- Responses included reference to gym facilities (102), swimming pool (31), sports / recreation (23)

#### Community facilities (126 comments)

- Responses included reference to health care / dentist (27), children's activity space (25), indoor community space (20) and community spaces (17), and also schools, library, gathering spaces for the community including young people, and childcare facilities.

#### Open space (72 comments)

- Vast majority of these responses sought protection or reprovision of open space, green space or somewhere to meet and socialise.

#### Employment uses (21 comments)

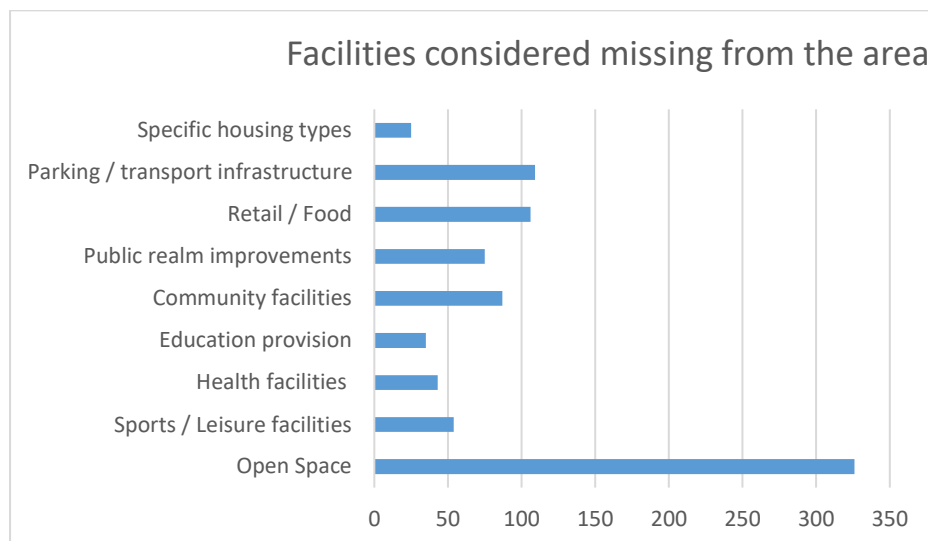
- Responses included reference to car dealerships (11), car wash (5) and general employment uses

#### Other comments

- This included reference to safeguarding public transport services, safe pedestrian routes, improvements to the tube stations, and improved bus and tube services.

### **Question 5 - Is there anything currently missing in this area and the area around it that the Plan should promote?**

500 people responded to this question.



#### Open space (326 comments)

- Public green / open space / park (233)
- Play equipment / playgrounds (31)
- Outdoor seating space
- Natural spaces
- Communal outdoor spaces
- Opportunities for allotments
- Green linkages for wildlife

#### Community facilities (87 comments)

A wide variety of uses were suggested including:

- General community and community spaces
- Affordable community centres
- Indoor child friendly space



- Family orientated infrastructure
- Facilities for teenagers
- Places for community to meet
- Community workshop spaces to promote sustainable local enterprises.
- Art galleries

#### Education (35)

- Schools
- Young adult education
- Nursery and childcare facilities

#### Health facilities (43 comments)

- Medical / GP services (31)
- Dentists
- Healthcare infrastructure
- Hospital capacity
- Social care facilities

#### Sports and leisure facilities (54 comments)

Comments included a wide variety of uses with the most common being:

- Non specific sports and leisure facilities
- Gym, including affordable provision
- Swimming pool
- Football pitches
- Playing fields
- Tennis
- Outdoor gym
- Basketball / netball courts

#### Public realm (75 comments)

- Safer cycle lanes / routes (19)
- Safer cycle parking
- Safe walking routes/ pedestrian areas
- Improved lighting
- Accessibility for disabled people
- Wider pavements
- Improved bridges over railway lines

#### Retail and food uses (108 comments)

- Large supermarkets
- More affordable shops
- Independent businesses
- Restaurants, cafes
- Garden centre

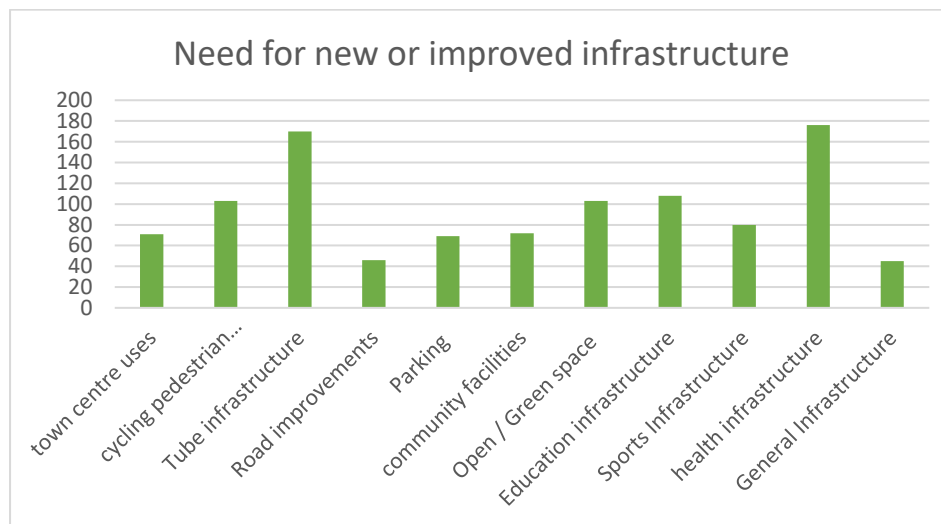
### Housing (25 comments)

Types of housing mentioned included:

- Social / affordable housing
- Housing for key workers
- Older citizens homes
- Low rise residential buildings
- Large family homes

### **Question 6 - Is there a need for new or improved infrastructure to support additional growth in this area? If yes, what do you think is needed?**

532 people responded to this question



### Town centre uses (71 comments)

Suggestions mentioned a wide range of uses including:

- Shops including independent uses
- Supermarkets
- Cafes / restaurants
- Pharmacies
- Newsagents
- Banks etc.

### Cycle / pedestrian improvements (103 comments)

Suggestions included:

- More, improved and safer cycle paths / lanes
- Improved and safe cycle parking
- Improved walking routes, wider pavements
- Upgrade pedestrian bridges
- Benches to rest
- Public toilets

### Tube Infrastructure (170 comments)

Suggestions included:

- Improved interchange between stations
- Upgrade stations / entrances
- Step free access
- Increased station and tube capacity
- Improved lighting and shelter / waiting rooms

### Road improvements (46 comments)

Suggestions include:

- Improve the road network
- Measures to reduce traffic
- Wider roads
- No through road from West End Lane to Finchley Road
- Provide facilities for electric vehicles
- Improve junctions at West End Lane/ Iverson Road/ wide Finchley Road

### Parking (69 comments)

Parking was raised as a general point with specific suggestions including:

- Short term parking for shoppers
- Parking for elderly and disabled people
- Underground parking
- Cheap / free parking
- Retention of some parking for essential visitors/ trade people / nurses etc.
- Electric / hybrid parking
- Residents parking

### Community / youth facilities (72 comments)

A range of facilities were suggested including:

- Community facilities, community space / centre (34)
- Communal workshops
- Libraries
- Space for young and elderly
- Activities for kids
- Youth centre
- Space for people to meet
- Shared spaces for people who work from home to use
- Skate park

### Green Open Space (103 comments)

Suggestions included:

- Green / open space (76)
- Play areas (32)
- Recreational areas

- Community projects
- Spaces for wildlife
- Planting / trees

#### Education (108 comments)

Suggestions included:

- New schools (80)
- Nurseries (16)
- Educational facilities
- Childcare

#### Sports Infrastructure (80 comments)

Suggestions included:

- Leisure facilities (31)
- Public swimming pool (11)
- Provision for young people
- Affordable gym facilities
- Courts – tennis, basketball, racquets
- Improved / affordable gym / outdoor gym facilities
- Climbing wall
- Playing fields

#### Health infrastructure (176 comments)

Suggestions included:

- More GPs and dentists (167)
- Increased hospital capacity (6)
- Mental health / social care services.

#### General Infrastructure (45 comments)

Specific suggestions included:

- Improved water systems and water pressure
- Upgraded sewers
- Improved drains and street surfaces
- Electrical substation to provide for future growth
- Improved rubbish / recycling systems
- Telecommunications improvements
- Police and safety measures

**Question 7 - The London Plan requires borough plans to identify sites that are suitable for tall buildings. Are there any specific sites or locations in this area that you think are suitable?**

531 people responded to this question. Around 90% did not support tall buildings.

The principal reasons for not identifying suitable sites included:

- No suitable sites in the area
- No need for any more tall buildings
- Area is already too densely populated
- Lower level buildings are more suitable
- Character of the area is low level buildings
- Would harm the unique character of the area
- Tall buildings are not conducive to healthy lives
- Safety concerns from tall buildings
- Detrimental environmental impacts caused by tall buildings in terms of climate concerns
- Tall buildings will result in overshadowing and blocking light and views
- People do not want to live in high density housing as they want space
- Design concerns of tall buildings
- Detrimental social cost of tall buildings

Around 10% of respondents considered that tall buildings could be suitable, including specific suggestions of the O2 site, along the railway lines and on the Homebase site. Some considered that 10 storeys would be the most appropriate height.

Other identified suitable locations included:

- Kilburn
- Swiss Cottage
- King's Cross
- Along the Finchley Road
- Outside of Camden

### **Question 8 - Do you have any comments about any specific sites allocated in the area?**

313 people responded to this question. Nearly all comments related to the O2 site. Specific issues raised related to:

#### Retaining the O2 centre, shopping facilities and parking (80 comments)

- Retain the large supermarket and homebase
- The centre has a community role as a place not only to shop and eat but also to socialise and meet safely. It is a community hub
- Importance of the cinema and gym to the area
- Keep parking spaces as people cannot do a family shop on a bike
- 10 responses suggested that they supported the redevelopment of the O2

#### The proposed development scheme (74 comments)

- The area is already too dense
- Additional housing is not needed in the area

- 950 homes is considered too high in terms of the impact on public transport, schools access to NHS facilities
- Density would result in poor quality housing and not enough open space or community facilities
- Proposal will result in overcrowding

#### Sustainable development / open space (12 comments)

- Demolition of the O2 is not sustainable, it is not old
- Additional green / open space is needed in any redevelopment
- A sense of place is needed to be provided

#### Height (32 comments):

- Proposed high rises are unacceptable
- No need for tall buildings
- 12 storeys is too tall and out of scale with the area
- Heights should be no higher than 8 storeys
- No towers should be allowed
- There are already too many tall buildings
- Need to respect the conservation area

#### Improvements to infrastructure (6 comments)

- Both tube stations should be upgraded
- All stations should be accessible
- Improve Granny Dripping steps

#### Parking (29 comments)

- Visitor parking must be provided
- Short term parking for shoppers should be retained
- Car free for residents will aggravate number of delivery vehicles for shopping etc

#### Comments on other sites

14 Blackburn Road – why this was not included in WH11 policy

#### 156 West End Lane

- Object to the proposed 164 homes
- Concerned about the actual redevelopment works as underway

100 Avenue Road - This should not be allowed.

## **Q9 - Do you have any other comments about the area policy?**

378 people responded to this question, with comments summarised below:

### Number of homes / Density (81 comments)

Comments included:

- Density is considered unacceptable / too much
- Area is already overcrowded/ over populated
- Camden should push back on dictated targets for homes
- No space for new homes
- Proposed density should be a maximum not a starting point
- Need to keep other facilities such as shops and restaurants rather than more housing
- Impact on character of the area

### Tall buildings (19 comments)

Comments included:

- Tall buildings are not considered suitable for this site or area
- Heights should be restricted to no more 7 or 8 storeys
- Harmful to the character of the area

### Housing (18 comments)

Comments included:

- There should be a mix of private and public housing
- Need affordable homes
- Should prevent properties being owned as investments / for foreign investors
- Affordable housing must be permanently low cost
- Priority should be for vulnerable people and special needs

### Loss of O2 Centre and facilities (20 comments)

Comments included:

- O2 centre should be retained with all its facilities
- Would result in loss of a community asset / focus point
- Supermarket and parking should be retained
- Leisure facilities are important to the area

### Impact on existing facilities and Infrastructure (17 comments)

Comments included:

- Existing infrastructure is already overstretched
- Improvement needed to infrastructure must be done to allow more people to live here
- Schools, GPs and parking are already over stretched
- More community and leisure facilities would be needed
- Lack of open space already in the area

### Transport issues (20 comments)

Comments included:

- Increased traffic on Finchley Road will be unmanageable
- Loss of the car park is unacceptable
- A cycle superhighway / new cycle lanes for West Hampstead should be provided
- Improved accessibility to Finchley Road Underground and Froggnal Overground should be included
- Private parking should be included as there will be people who do not have a blue badge but are unable to walk / cycle
- Improving the interchange between stations is crucial
- Electric charging points should be included

### Environmental / Climate concerns (10 comments)

Comments included:

- Development should focus on improving its green credentials
- Should focus on capturing water, solar energy and provide green space
- Should not demolish the O2 due to emissions
- Policy is contrary to the declared Climate Emergency

### General objections (37 comments)

These included a wide range of comments with some of the main points summarised below:

- The policy should be rethought completely
- The development is not wanted at all in the area
- Plan should be holistic / area masterplanned
- Plan should be refocused on what the local community wants
- The increased density across the area will deteriorate the quality of life for all residents

### Support / suggestions for the area policy (22 comments)

Comments included:

- Support for better use of badly used space in a prime location, but a good architect is required to make the best of the site.
- This is a good opportunity to build a sustainable and eco-friendly area
- Suggest use of a design code
- Ensure that public realm / new open spaces are of the highest standard
- Area will feel safer with people living there
- 950 homes is a step in the right direction compared to the more than double previously suggested by the developer
- The O2 is an eyesore, so this will improve the area

### Consultation (46 comments)

Comments included:

- Want the views expressed to be taken into account
- Feel that the process should be more transparent



- Feel that there should be more consultation with residents, local groups
- Want more details and definitions of plans
- Question why there is no new draft of the Site Allocations Document to comment on.