

# CANALSIDE TO CAMLEY STREET SUPPLEMENTARY PLANNING DOCUMENT

Public Consultation Feedback Report  
July-September 2020

# CONSULTATION SUMMARY

## OVERVIEW

The Canalside to Camley Street draft planning guidance document was produced to set out some key planning objectives and design principles to help shape, influence and guide future development proposals in the area. This would help to ensure that development that comes forward can deliver positive benefits and improvement, and make the area better for the local community.

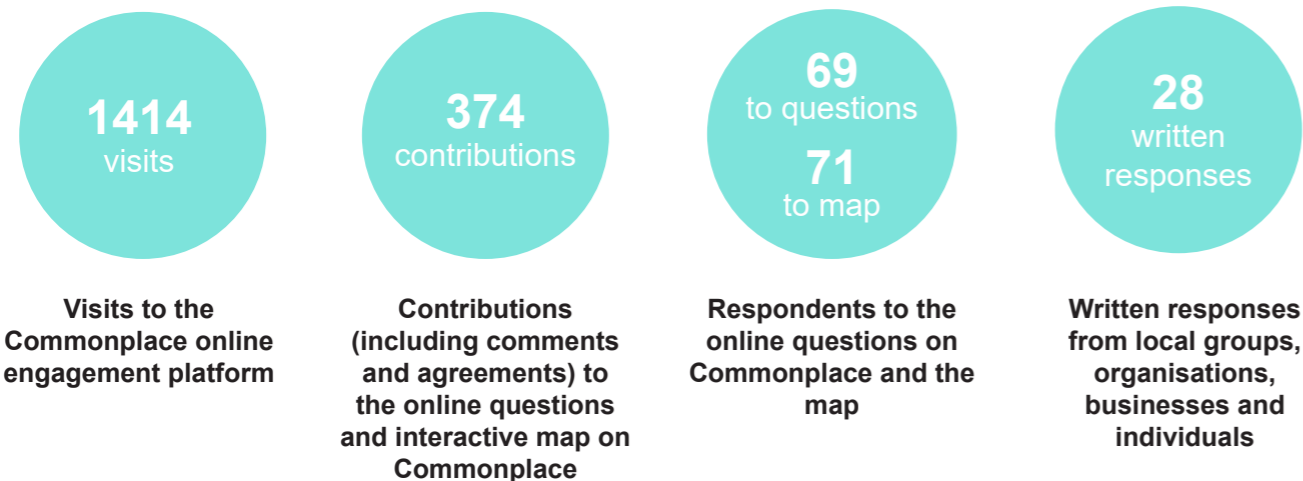
These benefits should help to meet Our Camden Plan ambitions, relevant Development Plan policies and aspirations of local residents and businesses set out in the Camley Street Neighbourhood Development Plan.

Camden Council ran a public consultation on the draft Canalside to Camley Street planning guidance document between the 16th July and 25th September 2020.

The Council published the draft document online and invited feedback via a questionnaire and an interactive map on Commonplace. A wide variety of methods were used to promote the consultation.

## WHAT HAPPENS NEXT

Responses to the public consultation were used to inform the development of the final draft Canalside to Camley planning guidance, which the Council plans to adopt as a Supplementary Planning Document (SPD) on 19th November 2021. The document will help to guide and shape the type, nature and feel of major developments that happen in the area and will be an important consideration when assessing planning applications.



## HOW THE COUNCIL ENGAGED

The public consultation was open to local residents, businesses, landowners, workers, community groups and anyone with an interest in the area.

Due to the impacts of Corona virus (Covid-19) the Council took measures to keep its communities and officers healthy and safe by changing the way it works and does things and an originally planned consultation starting in March 2020 involving drop-in events was postponed.

Even with the easing of lockdown measures, public health and distancing rules were continued, and although no face-to-face meetings were held, the Council took extra measures to promote, encourage and ensure that as many people as possible could have their say on the future of the area.

The following techniques were used to promote the consultation and encourage feedback:

- Dedicated website on the Commonplace online engagement platform. This included a list of bespoke questions and an interactive map for users to add more of their thoughts and ideas
- Emails to local organisations including tenants and residents associations and groups, local sustainability groups, statutory consultees and other interested parties (c.493)
- Promoted the consultation through the Planning Policy newsletter distributed more widely (c. 900 emails)
- Camden Climate Change Alliance monthly e-bulletin
- Press release sent to local media organisations and published on the Council's website
- Dedicated consultation email address
- Dedicated consultation telephone number for members of the public to speak directly to the team
- Opportunities for local groups, organisations and interested parties to engage with the team through remote meetings.
- Posters throughout the local area
- Facebook advertising campaign
- Electronic leaflets to local groups and organisations for wider distribution
- Camden Council website
- Publicity via Camden Council's social media including Facebook page and Twitter

# SUMMARY OF RESPONSES TO THE ONLINE QUESTIONS

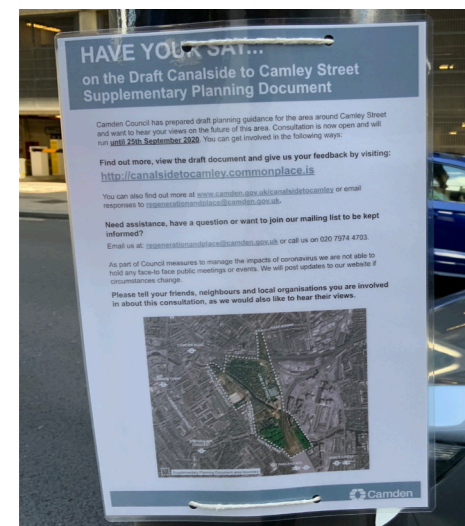
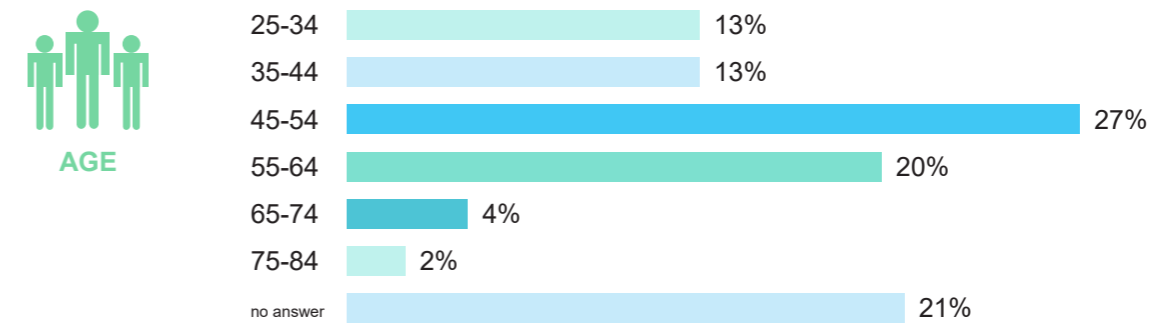
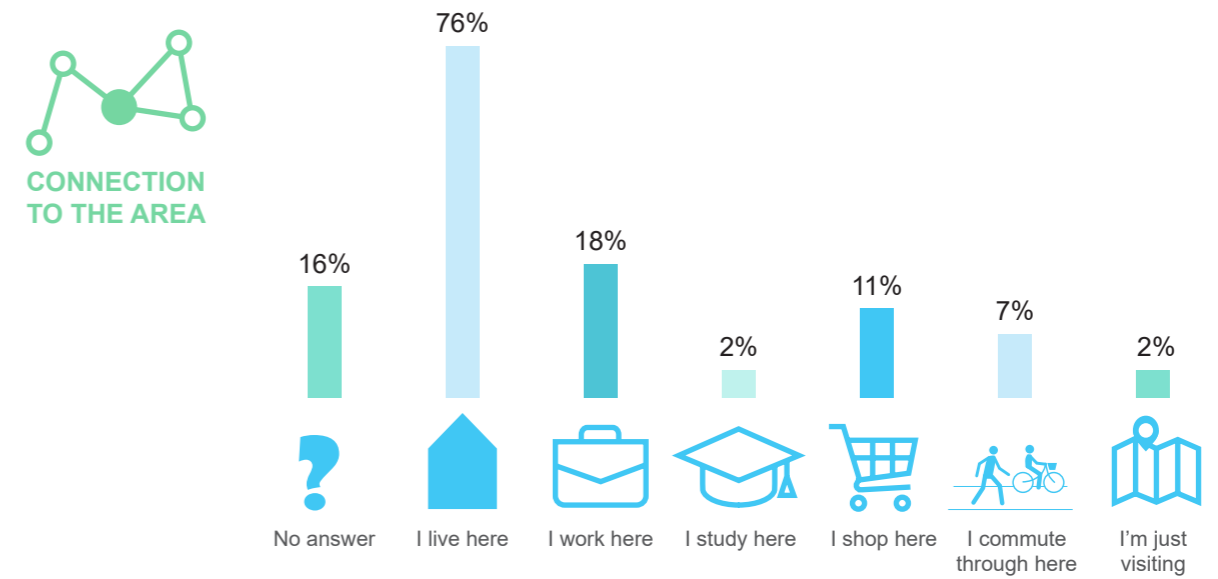
## METHODOLOGY

Commonplace was used as the main way for people to review and respond to the consultation material. Questions on Commonplace were set out by theme and via an interactive map. Camden Council conducted the analysis and prepared this consultation feedback report.

Written responses to the online questions were categorised and divided into themes. It should be noted that not every respondent answered all of the questions asked.

Responses received by email were also included for analysis. Due to the range of responses received, this report focusses on the most common responses and types of issues raised. All responses have, however, been considered in the consultation.

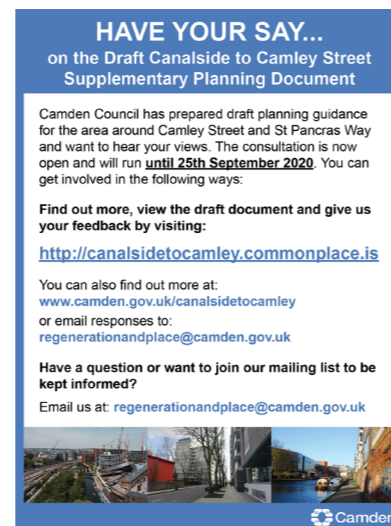
Whilst it is very helpful for the Council to know the socio-economic background of respondents to the consultation, significantly fewer respondents provided information about themselves including their age, ethnicity and health. There were proportionately fewer known respondents who identified themselves as from a black and minority ethnic background and/or whose day to day activities were limited due to health or disability reasons. To assess the impact on these and other protected groups an Equalities Impact Assessment was also undertaken and was published separately on the Council's website.



Site notice



Site notices throughout area



Newspaper add



## SUMMARY OF WHAT YOU TOLD US



### OUR APPROACH

There were a large number of visitors to the consultation on Commonplace most of whom viewed the material but did not comment. Reflecting on the broadly positive responses to the draft guidance, it is possible that many visitors felt no specific need to comment.



### AREA AND CONTEXT

What you like most about the area is that it is calm, peaceful and changing. You especially like the character and feel of Elm Village and want this to be retained.



### VISION AND OBJECTIVES

You were very positive towards the vision and objectives and provided many comments of support.

You said that you want more community gardens, green spaces and facilities for children and young people, improved routes for walking and cycling and for anti-social behaviour in the area to be addressed.

Some of you thought that the SPD did not give enough recognition to the existing diverse economic role of the area and other types of employment.



### ISSUES AND IMPROVEMENTS

Your top 5 words or phrases to describe what you least liked or valued in the area were:

1. Poor architecture and design
2. Unsafe
3. Uninviting
4. Fly-tipped
5. Lacking identity

You provided many comments echoing your top 5 dislikes in the area. You also told us that you want issues with vehicles to be addressed including speeding, pavement parking, noise and pollution.

You want the canalside to be more accessible and inviting.



### OPPORTUNITIES

You mostly agreed with the opportunities in the draft guidance. Your top 3 priorities for the area were:

1. Greener streets and places
2. Priority for cycling
3. Effective use of land

You want to see improved connectivity and accessibility for walking and cycling and housing that is genuinely affordable and not bought up by investors.

You support the economy and want more and affordable spaces for small and medium sized enterprises available for rent.



### FUTURE DEVELOPMENT

Your top 4 words or phrases to tell us what you would most like to see through future development and improvements were:

1. Family housing
2. High Quality Design
3. Affordable housing
4. Better use of land and buildings

You are concerned that high rise buildings could bring further issues to the area including creating wind tunnels, restricting daylight and views, and upsetting the biodiversity.

You want the guidance to say more about providing family housing, green spaces and green infrastructure.



### PRINCIPLES AND GUIDANCE

You were mostly positive towards opportunities for potential local improvements however a significant proportion of you were also 'very negative'.

Although the guidance says there is an opportunity to "enhance Barker Drive as a pedestrian friendly route to St Pancras Way", many respondents believed Barker Drive could be opened up to traffic (which was not the intention) and provided comments and negative sentiments opposing this.

A number of written responses from landowners were broadly supportive, but keen to ensure that elements of the guidance were not overly prescriptive and that parts of the policy context and guidance could be enhanced/expanded on. Other organisations and local groups were broadly positive about the draft guidance.

## AREA AND CONTEXT

What 3 words or phrases would you use to best describe what you most value or like about the area? We've suggested some below or you can add your own by clicking on 'Other'.

**CALM**

**PEACEFUL**

**CHANGING**

What do you think of the draft document's approach to describing the area?



### Commentary

22 comments and 11 agreements were received to the online questions under the heading 'Area and Context'

From the 'words or phrases' provided to describe what is most liked about the area, 'Calm' and 'Changing' were selected and 'Peaceful' was provided as an addition.

The majority of sentiments were positive towards the draft document's approach to describing the area (63% positive, 20% negative and 17% neutral).

In the more detailed responses, a varied range of comments and agreements to some of the comments were received. Despite the document setting out a key planning and design principle specifying the potential to 'enhance Barker Drive as a pedestrian friendly route to St Pancras Way', a large proportion of respondents who commented believed that the document suggested opening up Barker Drive to traffic (which was not the intention and there are no proposals to open up Barker Drive to through traffic). This resulted in most comments emphasising for Barker Drive to not be opened up to traffic for risk that it would create a 'rat run', make the area feel less safe, bring noise, pollution and anti-social behaviour.

Further comments were made about speeding traffic in the area and to not encourage more vehicles.

A notable proportion of comments were made in support of the document's description of the area, retaining the character and feel of Elm Village and to provide more local permaculture community projects.

Please tell us why you feel this way and add any further comments on what you like most about the area.



"I am not happy that Barker Drive will be connected to Camley Street by removing the bollard. It will create a rat run and make the street less safe"

"A fair description of the area"

"It is sensitive to the character of the area and the community"

"It is also dominated by fast moving traffic – even on Camley Street itself where speeds are excessive"

# VISION & OBJECTIVES

## What do you think about the draft document's vision and objectives?



### Commentary

16 comments and 4 agreements were received to the online questions under the heading 'Vision and Objectives'.

A significant majority of sentiments were positive towards the vision (87% positive of which 56% were very positive, 6% negative, 7% neutral and 0% very negative).

In the more detailed responses, the largest proportion of comments further expressed support for the vision and objectives.

There were a significant proportion of comments on public realm and greening including the aspiration to provide more community gardens and green spaces.

A significant proportion of comments and agreements were focussed on connectivity and accessibility. This included aspirations to improve routes and provisions for walking and cycling and for routes to feel safe however some comments were received to not open up the area as this could disturb the peacefulness.

Addressing anti-social behaviour in the area including fly tipping was also significantly mentioned.

A significant proportion of comments and agreements emphasised the importance to ensure the objectives are not met at the expense of existing local communities, and to provide facilities for children and young people.

Please tell us why you feel this way and add any further comments about the draft document's vision and objectives.



"I appreciate the focus on a sustainable, connected, multi-use area"

"As an area which is slightly cut off from noise and confusion of Camden, it would be good to keep it this way"

"It's a good vision for an area which is in need of improvement"

"It all sounds wonderful as an idea. The test is following it through and making it happen, uncompromised"

# ISSUES & IMPROVEMENTS

What 3 words or phrases would you use to describe what you least value or like in the area and that could be improved? We've suggested some below or you can add your own by clicking on 'Other'.

## POOR ARCHITECTURE AND DESIGN

**UNSAFE**

**UNINVITING  
FLY-TIPPED**

**UNATTRACTIVE  
INWARD LOOKING**

**LACKING IDENTITY**

**LACKING CHARACTER**

**TRAFFIC IMPACTS  
PEOPLE UNFRIENDLY  
EYESORES**

Do you agree with the issues that the draft document has identified in the area?



### Commentary

21 comments and 9 agreements were received to the online questions under the heading 'Issues and Objectives'.

Most of the 'words or phrases' provided for respondents to select to describe what is least liked or valued in the area and that could be improved were selected. The top five most commonly selected 'words or phrases' were:

1. Poor architecture and design
2. Unsafe
3. Uninviting
4. Fly-tipped
5. Lacking identity

There were significantly more positive sentiments agreeing with the issues that the draft document identified in the area (53% positive, 26% negative and 22% neutral).

In the more detailed responses a varied range of specific issues and agreements to some of the issues were received. The largest proportion of comments focussed on the character and design of the area with an aspiration to improve the area's appearance including street frontages, the canalside, and for improvements to be of high quality and better design.

A large proportion of comments highlighted issues with anti-social behaviour including drug dealing, fly-tipping and some parts of the area being used as a toilet.

A significant proportion of comments were focussed on issues with connectivity and accessibility with the aspiration for routes to be improved and feel safer for walking and cycling including access to Agar Grove and the caged bridge.

Issues with vehicles and traffic were also significantly mentioned including speeding, pavement parking and the noise and pollution goods vehicles bring to the area.

A notable proportion of comments would like the provision of more social housing.

Rough sleeping at points where Camley Street meets the railway bridge was also mentioned.

Please tell us why you feel this way and add any further comments about what could be improved in the area.



"Many of these more 'industrial' streets do not feel safe at night"

"Some bridges and locations are quite unsafe and inaccessible"

"Businesses along Camley Street should remain, however they could look better"

"Have more on the streets in this area, more shops or offices looking open and alive at street level"

# OPPORTUNITIES

What would be your 3 priorities for the future of the area? We've suggested some below or you can add your own by clicking on 'Other'.

**GREENER STREETS AND PLACES  
PRIORITY FOR CYCLING AND WALKING**

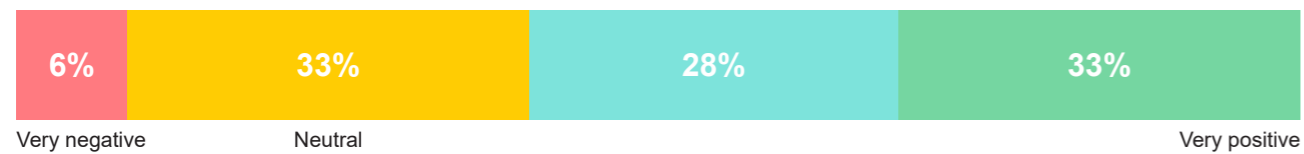
**MORE SUSTAINABLE  
MORE ACTIVE STREETS**

**MORE INCLUSIVE  
BETTER ACCESSIBILITY  
MORE INTERESTING  
BETTER MIX OF USES**

**EFFECTIVE USE OF LAND**

**TACKLING CLIMATE CHANGE**

What do you think about the opportunities we have identified in the draft document?



## Commentary

18 comments and 3 agreements were received to the questions under the heading 'Opportunities'.

Respondents top 3 priorities for the area were:

**1. Greener streets and places 2. Priority for cycling 3. Effective use of land**

There were mostly positive sentiments towards the opportunities identified in the draft document although a significant proportion were neutral. (58% positive, 33% neutral and 6% negative).

In the more detailed responses a variety of comments were made with the largest proportion focussed on connectivity and accessibility and its importance for the success of the area. Varied comments were made to improve connectivity and accessibility including a bridge lined up with the route to Kings Cross, separating pedestrians from cyclists for safety, providing more local bus routes and to ensure developers are not able to restrict public access.

A significant proportion of comments were made to further express support for the opportunities identified in the document.

There were a significant proportion of comments for housing to be genuinely affordable and not for investors to buy and even potentially rent out as Airbnb's.

A notable proportion of comments were made to support the economy and improve employment opportunities including providing affordable rented spaces for small and medium sized enterprises.

14 There were a number of comments to support more public spaces and greening.

Please tell us why you feel this way and add any further comments about the opportunities and priorities for the area.



“Exceptionally important to focus on greener and sustainable communities”

“I want to see commitment to keep cyclists and pedestrians separate”

“Space for smaller, community shops and workshops (for gardening, bike repairs, local crafts and foods) would be nice”

“Could the concept of affordable housing also be applied to affordable rents for smaller businesses”

“It all sounds so wonderful”



# FUTURE DEVELOPMENT

Please tell us 3 things you would most like to see through future development and potential improvements in the area. We've suggested some below or you can add your own by clicking on 'Other'.

## FAMILY HOUSING

**HIGH QUALITY DESIGN**  
**AFFORDABLE HOUSING**  
**BETTER USE OF LAND AND BUILDINGS**

**MIX OF USES**  
**ACCESS TO CANAL**  
**PLACES TO EAT AND DRINK**

**TACKLING CLIMATE CHANGE**  
**PLACES TO PLAY**  
**MORE/VARIETY OF SHOPS**  
**PLACES TO SIT**

**IMPROVED ACCESSIBILITY**  
**COMMUNITY SERVICES AND FACILITIES**

How well do you think the draft document describes what is happening in the area?



0 respondents were 'Very negative'

### Commentary

21 comments and 2 agreements were made to the online questions under the heading 'Future Development'.

The top 4 words or phrases to describe what respondents would most like to see through future development and potential improvements, which were equally selected were:

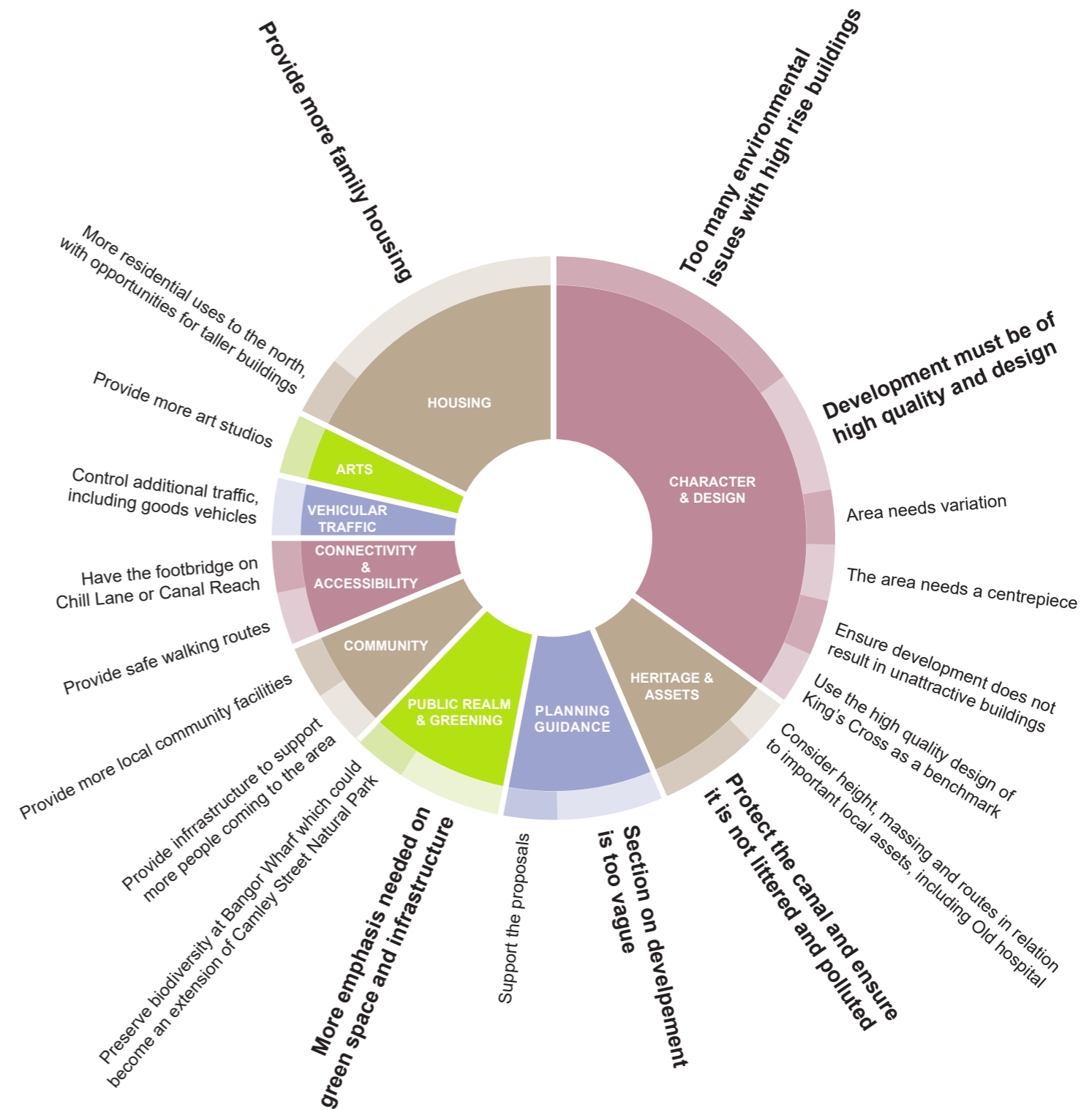
1. Family housing
2. High Quality Design
3. Affordable housing
4. Better use of land and buildings

Respondent's sentiments towards the draft document's description on what is happening in the area were significantly positive (57% positive, 29% neutral and 14% negative).

From the wide range of comments in the more detailed responses, the largest proportion were on the character and design of the area with strong emphasis on the issues high rise buildings could create including wind tunnels, restricting daylight and views, and upsetting the biodiversity. Also included in these comments were ambitions for development to be of high quality design, attractive, varied and to have a centrepiece.

A significant proportion of respondents commented to want more family housing, more emphasis on green space and green infrastructure and to protect the canal from litter and pollution.

Please tell us why you feel this way and add any further comments on potential future developments in the area?



"Housing for families not greedy landlords"

"The new developments that have gone up on Camley Street are turning it into a wind tunnel"

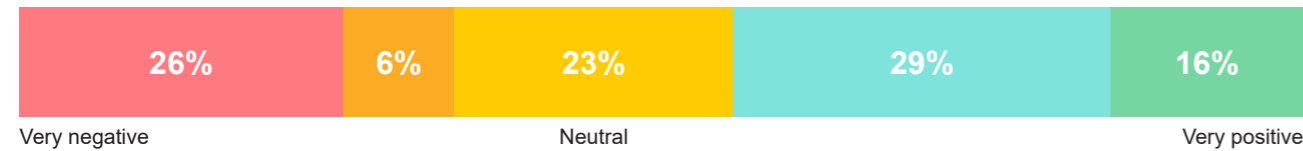
"My main concern is height of developments that overlook the canal"

"Emphasis on green infrastructure"

16 Some respondents commented that this section of the document was too vague.

# PRINCIPLES & GUIDANCE

What do you feel about the opportunities for potential local improvements, such as new and improved routes and places where new public spaces could be created?



## Commentary

30 comments and 43 agreements were made to the online questions under the heading 'Principles and Guidance'.

There were mostly positive sentiments towards the opportunities for potential local improvements, such as new and improved routes and places where new public spaces could be created but there were also a significant proportion of very negative and neutral sentiments. (26% very negative, 6% negative, 23% neutral, 29% positive, 16% very positive).

In the more detailed responses the highest proportion of comments and agreements by far did not want vehicular access between Barker Drive and Camley Street as this could potentially impact the calm and peacefulness of Elm Village, increase pollution and make this part of the area feel unsafe. The proportion of responses and agreements in relation to this is likely to account for the significant number of negative sentiments to express what respondents thought about the opportunities for potential local improvements set out in the document.

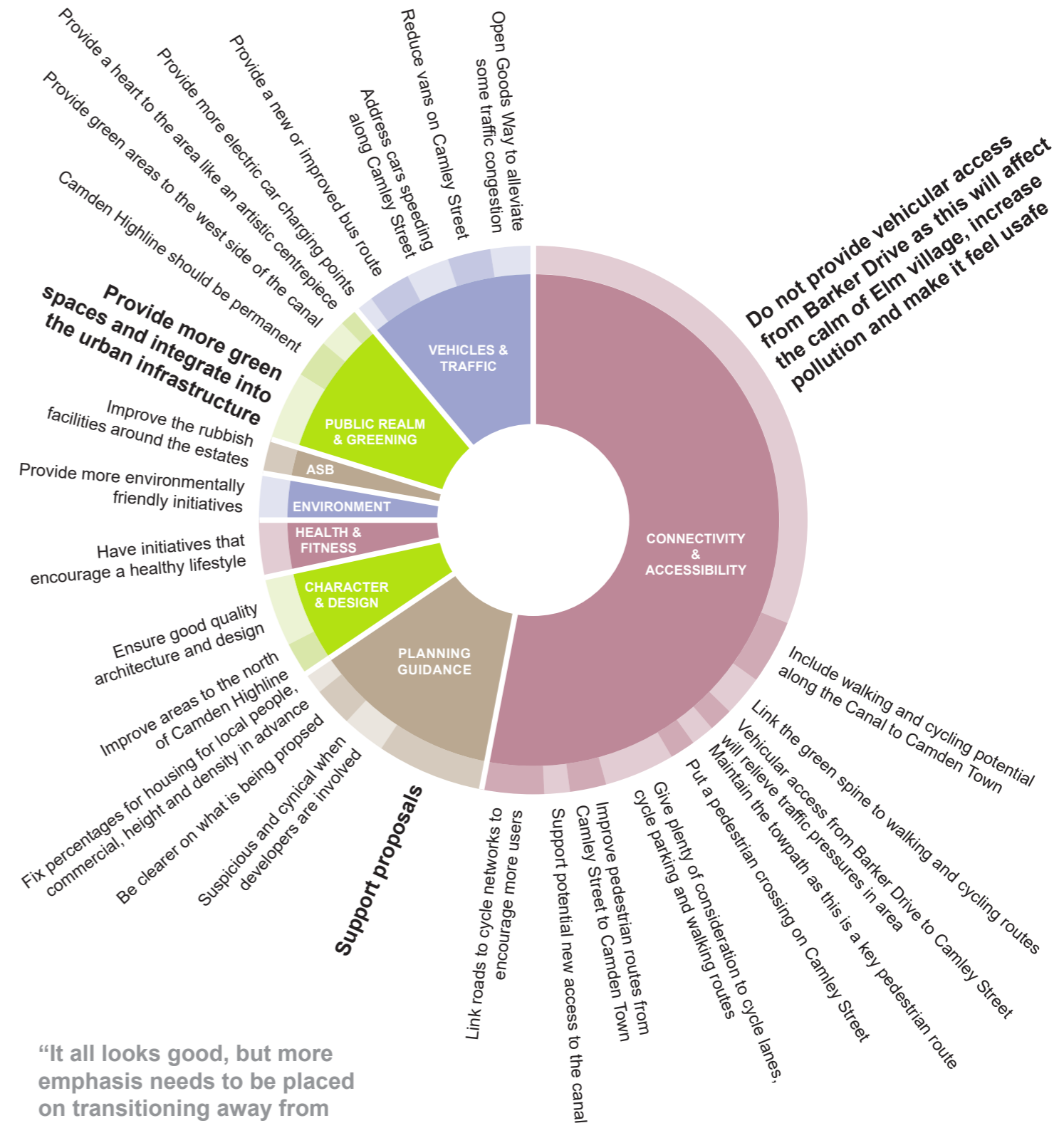
Other comments received were varied with many further comments and suggestions to improve walking and cycling connections and accessibility.

There were a significant proportion of comments focussed on vehicles and traffic including to address cars speeding on Camley Street, reduce the number of vans on Camley Street and to open Goods Way to alleviate some of the traffic and congestion.

There were a significant proportion of comments supporting the proposals.

A notable proportion of comments would like the provision of more green spaces integrated into the urban infrastructure and for the architecture to be of high quality and design.

Please tell us why you feel this way and add any further comments on potential future developments in the area?



“It all looks good, but more emphasis needs to be placed on transitioning away from fossil fuels, providing spaces for and promoting local natural habitats to address the current ecological crisis”

“Don’t ignore the canal’s walking and cycling potential west to the Sainsbury’s on Camden Rd and on to Camden Market.”

“Please do not open the car access in Barker Drive”

## SUMMARY OF INDIVIDUAL RESPONSES

### WRITTEN RESPONSES

Two written responses were received from individuals.

A response stressed not to open up vehicle access between Barker Drive and Camley Street and provided a number of reasons to highlight negative impacts increased traffic could have on the area including heavy commercial vehicles potentially bringing dangers and pollution, and attracting anti-social behaviour.

Another response welcomed the intentions of the SPD and its principles however recommended that instead of the “knowledge quarter” there is equally a med/science quarter and the Camley Street area could equally be termed the “food quarter” to acknowledge the area being centrally important in its supply to food outlets and the largest businesses in Camley St are food businesses.

Also there needs to be a reference about supporting existing businesses that wish to stay in the area, that the development of Council leasehold sites should be integral to the vision, and welcomed references about housing and affordable housing, but for the Council to show its commitment to seek the maximum possible proportion of genuinely affordable housing mainly for rent.

### CAMLEY STREET NEIGHBOURHOOD FORUM (CSNF)

CSNF support many parts of the draft guidance, but also disagreed with some parts or would like them to be clarified. These include the repeated mention of the area being a ‘Knowledge Quarter’, omitting other equally significant economic and social dimensions of the area including health and food related businesses and potential for other cultural uses.

CSNF would like the vision to see the area as a single coherent whole and suggested some elements for the vision. The SPD area must provide homes for all, remain an area of diverse employment with jobs for all members of the community, and the SPD should acknowledge the established and diverse business community already present and for existing jobs and businesses to be protected.

CSNF suggested improving transport infrastructure including via a platform across the Kings Cross and St Pancras railway lines covering the gap from Agar Grove in the north to the east-west overground lines in the south and also suggested providing a tunnel roadway beneath the Kings Cross and St Pancras railway lines where there is already a deep cavern, which could be extended linking Camley Street and Kings Cross Central. Barker Drive must not reopen to traffic. The response also suggested some more specific changes to the wording and other elements of the SPD.

### SOMERS TOWN NEIGHBOURHOOD FORUM (STNF)

STNF provided comments to sections of the draft guidance with concerns about the colour changes on the online text which made it difficult to read and process.

STNF were concerned whether the existing situation regarding connectivity was up to date making it difficult to consider whether it needs improving.

STNF recommended emphasising the existing strengths of the area more.

STNF would like the ambition of the guidance to see tangible benefits from growth to be better defined and that new development including knowledge quarter uses provide local benefits such as access to high quality open spaces, access to jobs and training, supporting the local economy and local education and as part of a mixed economy. It is essential that the physical and social infrastructure is added to, rather than just improving links to existing infrastructure, such as new open spaces, to accommodate a potential increase in numbers of people in the area.

## SUMMARY OF WRITTEN RESPONSES

28 statutory consultees, organisations, landowners, occupiers and other interested parties sent a formal response. Some of the key comments received are summarised below:

### ALARA WHOLEFOODS

Alara Wholefoods supports the detailed response from the CSNF and commented that recognition about food and the people supplying it is missing and is vital to the health of society and builds on the heritage context where Granary Square and Granary Street used to be the “bread basket” for London.

The SPD focuses on the “Knowledge Economy” and an overriding focus on money drives inequality and unfairness in our economy.

There is an opportunity to form a strategic partnership between the Community, London Borough of Camden and the Greater London Authority (GLA) to build an exemplar co-located development on Camley Street and this is missing from the SPD.

### CAMDEN CYCLING CAMPAIGN (CCC)

CCC were pleased to see comments made to the Neighbourhood Plan reflected in the draft guidance. CCCs comments were around issues of connectivity, access and safety for pedestrians and cyclists and were generally supportive and agreed with many aspects of the SPD.

CCC expressed serious concerns about reopening Barker Drive to through motor traffic stating that this was a notorious rat-run and would put residents, cyclists and pedestrians at risk.

### CAMDEN STREET LAND OWNERS

The response highlighted that adjacent landowners (of 104, 106, 108-114, Cedar Way and 120-136 Camley St including Camden Council) had come together collectively in recognition that the potential of Camley Street will best be achieved by agreeing a collaborative and integrated approach to development across individual sites.

The response listed some agreed concept design principles believed to be in keeping with the aspirations of the draft SPD and recommended they are included within the document in order to maximise positive outcomes arising from redevelopment and will provide tangible benefits to the local community and help achieve the LPA's vision for the area.

## CANAL AND RIVER TRUST

The Canal & River Trust were very pleased to see the SPDs understanding of the role the canal can play in improving health and wellbeing and would like to collaborate further. There were some areas of the SPD where the Trust would like to see more mention of the canal as an opportunity to realise the potential of the area including broadening 'streets' to include towpaths and footpaths, for development to bring enhancements to the canal and canalside and for the SPD to mention boats or boaters and welcomed references to potential mooring locations.

The Trust highlighted their previous concerns about a potential new bridge in the area including impact on permanent and temporary moorings, heritage impact, necessity and tunnelling effect for towpath and canalside users but were further considering the principle of a bridge in view of likely change in the area.

## CBREGI

CBREGI hold a long leasehold interest of 104 Camley Street and are exploring options to redevelop the site and wish to maintain their position as an interested stakeholder in the redevelopment of this part of Camden.

CBREGI made representations on the Canalside to Camley Street draft planning guidance document to assist with assessing the development potential of 104 Camley Street and to ensure its development is consistent with the objectives of LB Camden's Camley Street Vision, LB Camden's emerging Site Allocations Local Plan, the emerging Camley Street Neighbourhood Development Plan and the emerging Camley Street masterplan..

CBREGI were generally supportive of the broad principles and objectives set out in the draft SPD to guide future development and improvement in the Camley Street area. CBREGI were supportive of the desire to improve permeability along Camley Street particularly for pedestrians and cyclists and instead of the proposed central route through sites the focus of pedestrian movement should be on Camley Street and assist activation of frontages and the appropriateness of routes are considered on a site specific basis. CBREGI support the creation of publicly accessible open space with urban greening across all sites but not the proposed location in relation to their future intentions.

## ENVIRONMENT AGENCY

The Environment Agency commented that there are no constraints that fall within their remit and did not have any further comments to make.

## GREATER LONDON AUTHORITY (GLA)

The GLA commented that whilst it is understood that the approach set out in the draft guidance is based on Camden's adopted Local Plan, it should also take into account up-to-date London Plan evidence and the industrial approach set out in the Intend to Publish (ItP) London Plan, which were material planning considerations.

The draft guidance should recognise more fully the predominant industrial nature of the area and its important relationship with the Central Activity Zone (CAZ), and would benefit from a clear policy requirement for the protection of CAZ related industrial uses.

Whilst adopted site allocations would be supported, the introduction of non-industrial uses will only be supported where they are consistent with ItP London Plan Policy E7. To improve alignment with Policy E7 of the ItP London Plan, the potential introduction of non-industrial uses into industrial areas should only be explored alongside opportunities to intensify industrial capacity to ensure that sufficient floorspace is preserved in the long term. For other sites in the draft SPD which are industrial in nature and have not been allocated, the loss of industrial capacity will only be supported where there is no reasonable prospect of the site being used for industrial and related purposes set out in ItP London Plan Policy E4, or where suitable alternative accommodation is available in reasonable proximity or where industrial floorspace capacity is provided as part of a mixed use intensification where this is feasible in line with Policy E7.

The draft SPD's intention to improve connectivity, permeability and active travel opportunities as well as the intention to put Healthy Streets Principles into practice is welcomed. So too is the commitment to joint working with transport agencies to deliver the SPD's objectives and the identification of protected vista(2A.1), but could include precise building height limits. While it is the intention of the draft SPD to open up pedestrian access and enhance the attractiveness of the area, continuing industrial and related activities in the area should not be compromised in terms of their continued efficient function, access and service arrangements. Offices should be directed towards the CAZ and town centres in accordance with ItP policy E1 and there should be differentiation of uses under the term "employment uses".

The SPD does not reflect the ItP London Plan's Threshold Approach to affordable housing as set out in Policy H5. Where residential development is proposed on industrial land that would result in the loss of industrial floorspace capacity the Mayor sets the threshold level of affordable housing at 50%. This threshold level for affordable housing also applies to public sector land that is not part of an agreed portfolio with the Mayor.

## HIGHWAYS ENGLAND

Highways England are satisfied that the guidance will not materially affect the safety, reliability and / or operation of the Strategic Road Network and do not offer any comments on the consultation at this time.

## HISTORIC ENGLAND

Historic England generally support the aims and strategy set out in the draft guidance stating that they are well considered and should be beneficial in advising future development and opportunities for the area.

Historic England are pleased that the guidance requires new development to be based on a clear understanding of the local character and context and be of the highest design quality, and that tall buildings are only permissible in exceptional circumstances, and as part of a coherent development strategy. Historic England encourages Camden to consider further how these might be applied in the guidance.

Historic England are pleased with the identification of heritage assets and opportunities for enhancement in the guidance and would like more emphasis on the need for works to

secure the Grade II listed St Pancras Old Church and its churchyard as valuable social assets, and are committed to working with partners to enhance their condition, access and use.

Historic England advised that St Pancras Churchyard, Regents Canal and Railway lands within the area have the capacity for significant archaeology and recommend highlighting this in the guidance. The Shorebase Access site and St Pancras Hospital site are opportunities with possible archaeological implications.

### **KINGS CROSS CENTRAL LIMITED PARTNERSHIP (KCCLP)**

KCCLP welcomes the positive tone of the draft guidance such as acknowledging the significant opportunities for transformation (page 6); a more effective and intensive use of land (page 35); and the reinforcement of an employment role for the area (page 35). and agree that the purpose should set out broad principles and objectives to guide future development and improvements in the area. It should not set rigid rules for schemes to adhere to.

KCCLP made further specific comments to sections of the guidance to show support or suggesting some wording changes for further clarification.

### **LONDON BOROUGH OF CAMDEN (LB CAMDEN)**

Overall LB Camden as landowner of some of the sites within the area welcomed the publication of the draft guidance and strongly supported taking a strategic Council-led approach to shaping the future of the area and supported the overall vision-setting, area-wide and site-specific sections.

It was emphasised that the objective of the response was to ensure current deficiencies of the Canalside to Camley Street area, correctly identified by the LPA, are addressed and improvements envisaged in the draft document are delivered. In order to successfully achieve these aspirations more detailed comments with proposed amendments were provided and areas identified where clarification or further justification would assist in making the SPD as effective as possible. These included more efficient and intensive use of land could be defined as optimising the development potential of land, clarifying Camden's housing needs, more clarification and prominence on the Local Plan and London Plan approach to employment space, the relationship of policy documents and indication of s106 and CIL priorities. Further comments on more specific issues such as design, heights and types of spaces and routes were also provided.

### **MARINE MANAGEMENT ORGANISATION (MMO)**

MMO reviewed the SPD and a bespoke response was not required.

### **METROPOLITAN PROPERTIES COMPANY LIMITED (MPCL)**

MPCL support the vision for the area set out in the draft guidance but were concerned about the design principles (p.58) showing a potential pedestrian route and new access road through the middle of the site and location of an open space as this would reduce the opportunity to optimise the use of the space for redevelopment, require it to be broken up with development at the front and rear of the site, and would exacerbate its narrowness.

MPCL recommend retaining the existing route along Camley Street and introducing a route at the rear of the site toward the railway tracks, which would enable the opportunity for open space at the front of the site and vehicular access should be retained in its current position.

### **MOORFIELDS EYE HOSPITAL**

Moorfields Eye Hospital were generally supportive of the site opportunities and priorities included within the draft guidance for the St Pancras Hospital site, particularly development of the site for medical and health uses.

Moorfields Eye Hospital and University College London (UCL) are committed to improving the public realm and permeability through and across the site, as well as providing a purpose built, joint medical facility.

### **NATIONAL GRID**

National Grid identified that one or more sites within the draft guidance area crosses or are within close proximity to National Grid assets, primarily 102 and 103 Camley Street and former Jubilee waterside centre and underground cable under the adjacent canal towpath.

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

### **NATURAL ENGLAND**

Natural England commented that the SPD is unlikely to have major effect on the natural environment, but may nonetheless have some effect. Natural England therefore did not wish to provide specific comments, but advised consideration of green infrastructure, biodiversity enhancement, landscape enhancement, other design considerations and strategic environmental assessment / habitats regulations assessment.

### **NHS LONDON HEALTHY URBAN DEVELOPMENT UNIT (ON BEHALF OF NORTH LONDON CLINICAL COMMISSIONING GROUP)**

Overall, the CCG supports the draft document. The Clinical Commissioning group (CCG) would welcome the opportunity to assess the healthcare infrastructure needs in the area as part of an updated Infrastructure Delivery Plan for the Site Allocations Local Plan. The introduction of a significant amount of new homes will have an impact on local healthcare infrastructure.

The CCG supports the need for a comprehensive, co-ordinated and integrated approach to bringing forward and delivering site proposals in the draft guidance area. The CCG is looking to provide additional primary care capacity in the Kings Cross area and is keen to explore different options.

The CCG notes that the Council is considering the future for sites to the south of Agar Grove at 120-136 Camley Street and Cedar Way Estate under the Community Investment Programme. The CCG would welcome further discussions on the proposals for these sites and any opportunities to provide new facilities or use developer contributions to enhance existing facilities.

The CCG suggested an objective under 'Realise the Potential' to introduce social infrastructure as part of a richer mix of uses in the area as these will be required to support an increasing resident and working population.

The CCG support the objectives under 'Better Places for People' which recognise the health and wellbeing benefits of green infrastructure and greater opportunities for walking and cycling.

The CCG welcomes ongoing discussions between the London Borough of Camden and Camden and Islington NHS Foundation Trust about the St Pancras Hospital site to realise the potential to deliver new health and research related facilities, deliver new housing and re-design the buildings and spaces so that the site connects better with the surrounding area.

## THE REGENTS NETWORK

The Regent's Network strongly opposed the draft guidance and expressed that the heritage canal is enclosed by overbearing buildings that should not have been given planning consent by Camden Council as they threatened to overpower the Canal by taking away its open space and plunging it into shadow. The Regents Network are very concerned that there is more overdevelopment to come through the guidance and that this will not benefit the many.

## ROCHESTER CONSERVATION AREA (RCA)

RCA does not think Camden Town should be included in the guidance for a number of reasons including that it does not match the approved Council policy and has different planning needs.

RCA would like more attention to support walking, cycling and disabled mobility into the triangle of Camley Street including improving the junctions at St Pancras Way, Agar Grove and Kings Cross and using the Community Infrastructure Levy to improve pedestrian use and stop cycling on the Canal towpath. RCA would like the services of east Camden to be improved and consider that there are needs for a health centre and elderly care facilities.

## ROYAL MAIL GROUP LTD

Broadly and in principle Royal Mail Group Ltd support the draft SPD and the vision to create 'a more attractive and accessible area of transition between Camden Town and Kings Cross, complementing and building on the change already happening in the area'.

Royal Mail commented some parts of the draft guidance do not allow flexibility and opportunity for all parties involved to explore different ways for future development to deliver on the Council's priorities and objectives. The text and diagram on pages 56 and 57 of the draft SPD relating to the Parcelforce site is considered too prescriptive at this stage of the process. The quantum and layout of proposed new routes would significantly restrict certain development opportunities from coming forward and the suggestion that building lines should be set back along frontages is again too prescriptive and arguably not an appropriate townscape solution. As a minimum any diagrams in the draft SPD such as the one on page 57 should be clearly labelled as indicative and more detail brought forward in a Site Allocations DPD.

## SHAW CORPORATION LIMITED (SCL)

SCL support Camden's adopted Local Plan priorities and suggest that provision of significant new housing and affordable housing be added to the list of priorities identified in the adopted Local plan.

SCL generally support the vision, objectives and principles set out in the draft guidance and especially expressed strong support for the more effective and intensive use of land creating activity and variety in higher quality development and optimisation of housing and affordable housing, but disagree it needs to be focussed in the north.

SCL acknowledges that the vision in the draft guidance is not fixed and inflexible and commented that this is important as it will help encourage land owners and developers to come forward with development opportunities.

## SPORT ENGLAND

Sport England commented that the draft guidance does incorporate some Active Design principles through the promotion/facilitation of improved active travel modes, improved and new public open spaces and realm and opening up of the canal path for leisure which are all supported but would support this being brought out more in the document. A link to the Active Design documentation in the Draft SPD could be useful.

The SPD should highlight the potential pressure of increased demand on facilities and potential for new development to contribute towards meeting the demand that they generate should be identified. Sport England commented that the guidance's reference to 'Development Opportunities' is mostly residential and employment and would recommend ancillary and small scale uses to support increased activity. Sport England would support increasing sport and recreation facilities within the area that could complement the surrounding built form, for example indoor climbing centres, where there is a justified need for such facilities.

## TRANSPORT FOR LONDON (TFL)

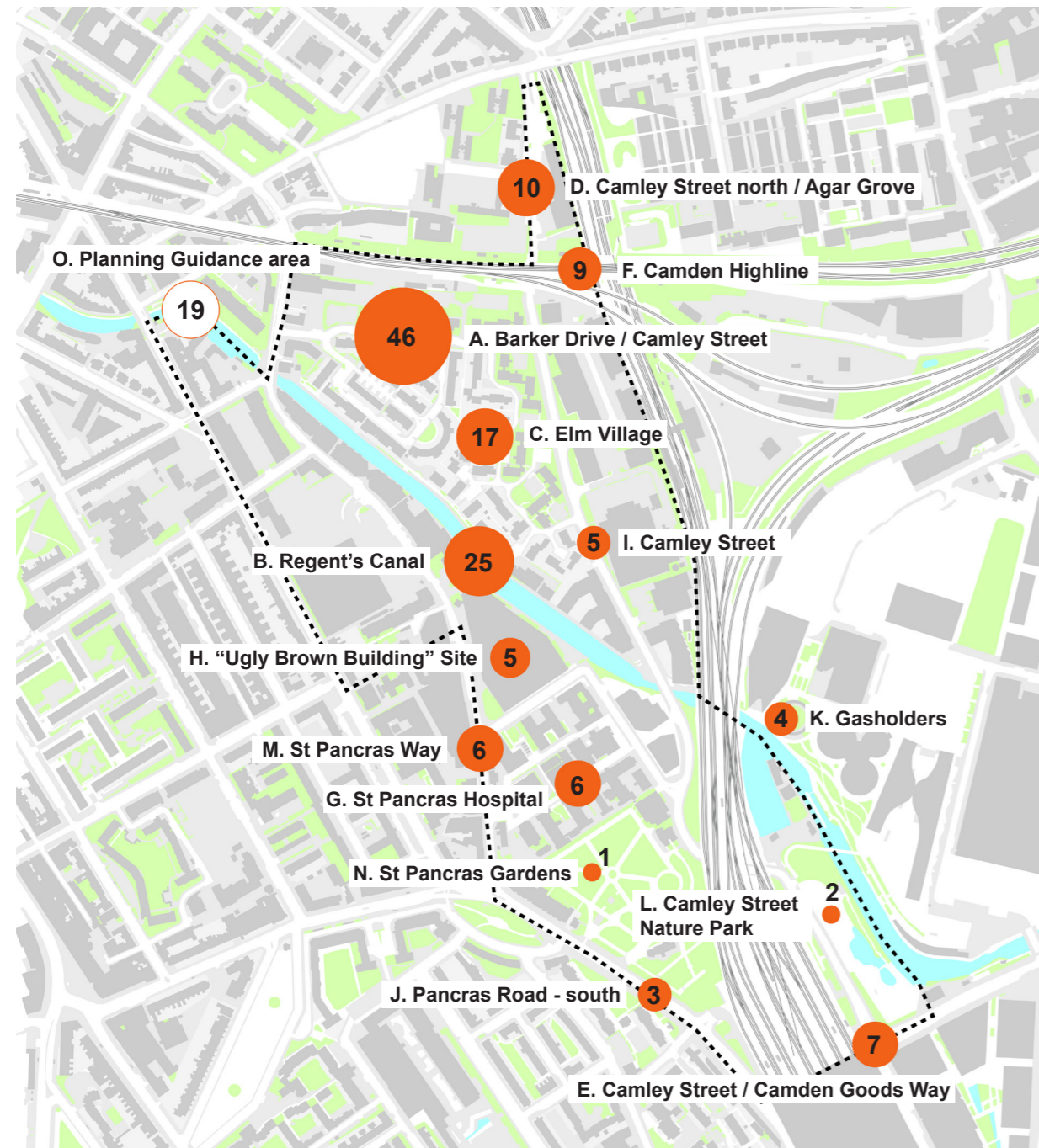
TfL welcomed the emphasis in the draft guidance on improving connectivity, permeability and active travel opportunities as well as the intention to put Healthy Streets Principles into practice. TfL also welcomed the commitment to joint working with transport agencies to deliver the objectives, including in relation to specific named transport projects such as improvements at Euston due to HS2 and the Camden Highline.

## UNIVERSITY COLLEGE LONDON (UCL)

UCL wish to support the principles of the draft SPD and supports the four key priorities for the regeneration of the area.

UCL emphasised its support of the Knowledge Quarter, and their occupation of BaseKX at 103 Camley Street which gives people the creative and collaborative space to get ideas off the ground and generate new employment opportunities and also has an interest in the developments at St Pancras Hospital, which are planned to include UCL institutes. Small and medium sized enterprises and start-ups can also benefit from the proximity and support of universities such as UCL.

# SUMMARY OF MAP RESPONSES



The size of each circle represents the proportion of comments and agreements received for each area. The number represents the number of comments and agreements for each area.

## A. BARKER DRIVE / CAMLEY STREET

Virtually all respondents said this route should not be opened up to vehicles as this could bring noise, pollution, disturb the peace of Elm Village and make the area feel unsafe.

## B. REGENT'S CANAL

The largest proportion of respondents would like to protect the biodiversity (including birds nesting) at the northern end of the canal, by locating the proposed public open area to the opposite side.

Further comments were in favour of opening up pedestrian access to the canal, providing opportunities for canalside cafes, improving the lighting and canal towpath for pedestrians and cyclists.

## C. ELM VILLAGE

Respondents were concerned about landlords renting out their parking spaces as a business as this makes the area feel unsafe and residents feel like they are living in a car park.

## D. CAMLEY STREET NORTH / AGAR GROVE

Respondents like having this link but would like it to feel safer at night.

Some suggestions were made to increase its usage and make the route feel safer including safely opening it up to some traffic.

## E. CAMLEY STREET / CAMDEN GOODS WAY JUNCTION

Respondents were concerned about waiting taxis blocking up the junction and the dangers this could cause to cyclists.

## F. CAMDEN HIGHLINE

The majority of respondents support the Camden Highline and think it will bring great benefits to residents.

A smaller proportion of respondents were less supportive and said the Camden Highline will bring more traffic to a quiet residential area and instead would prefer investment in other ways to benefit local communities.

## G. ST PANCRAS HOSPITAL

Respondents were in support of St Pancras hospital being a significant heritage asset and for the Moorfield development to not overwhelm this or the park and church.

Respondents would like the guidance to provide greater steering of the hospital site development.

## H. "UGLY BROWN BUILDING" SITE

Respondents would like housing development to provide truly affordable family homes and would like commitment of this in the guidance.

## I. CAMLEY STREET

The majority of respondents would like measures in place to reduce the amount of vehicles and speeding through the area.

A smaller proportion of respondents would like active frontages on both sides of Camley street and a safer crossing route near the gates to St Pancras gardens.

## J. PANCRAS ROAD SOUTH

Respondents expressed concern about the narrow and busy footpath to the east side of Midland Road alongside St Pancras station and the pollution caused by the waiting taxis which makes this route unpleasant.

## K. GASHOLDERS

Respondents liked this area especially how it has been developed with the industrial heritage alongside and would welcome similar development.

## L. CAMLEY STREET NATURE PARK

Respondents would like an improved and easy to identify entrance into the nature reserve.

## M. ST PANCRAS WAY

Respondents were concerned about speeding traffic and the abandoned and empty feeling of this area. Need to address lighting and imposing warehouse frontages.

## N. ST PANCRAS GARDENS

Respondent was positive about this area and would like its importance in terms of greening to be recognised.

## O. PLANNING GUIDANCE AREA

Respondents were concerned that development could benefit developers over local communities and would like commitment to improving the quality of life for local people.

## HOW HAS THE SPD CHANGED?

Many revisions to the SPD were mainly factual and updated various sections since it was originally drafted, e.g. the policy context (including the London Plan and updated National Planning Policy Framework and the enhanced focus on design) and latest proposals for sites across the wider area. Other revisions were relatively minor to assist clarity, however there were certain areas introduced or changed more substantially in response to comments made. These include:

- A summary of response “headlines” is included in a “What you told us...” section in the revised SPD.
- Updated diagrams to reflect latest approved and emerging schemes and to address various responses (and reaffirming that Barker Drive is not proposed to be opened up)
- Further emphasis on social value, inclusive economy and good growth objectives
- Giving greater emphasis to the current diverse economic role of the area and maintain and support a diversity of types of employment spaces (and job opportunities)
- More clarity about where SPD sits in hierarchy of decision-making and updated the status of the Neighbourhood Plan and London Plan and their objectives
- Greater clarity on expectations for the development of employment sites
- Re-emphasising housing as a land use priority across the area, including genuinely affordable housing at social rent levels
- Greater emphasis on need for additional open spaces
- More recognition about the role of the canal
- To support delivery of key infrastructure improvements and address possible impacts, the delivery section has been enhanced to bring out s106/CIL priorities more and reiterate the need to address the cumulative impacts of construction and effective community liaison

## LIST OF STATUTORY CONSULTEES AND ORGANISATIONS

- Adjacent London Boroughs
- Camden Cycling Campaign
- Camden Town Unlimited
- Canal and River Trust
- CCG and other health bodies/organisations
- Civil Aviation Authority
- Conservation Area Advisory Committees
- Environment Agency
- Greater London Authority
- High Speed 1
- Highways Agency
- Highways England
- Historic England
- Homes England
- London Enterprise Panel
- London Wildlife Trust
- Marine Management Organisation
- Metropolitan Police
- National Grid
- Natural England
- Neighbourhood Forums
- Network Rail
- Office of Rail Regulation
- Royal National Institute of Blind People
- Sports England
- Thames Water
- The Coal Authority
- Transport for London



