

Camden Site Allocations

Statement of Representations to Proposed Submission Documents (Regulation 22)

September 2012



Introduction

The Camden Site Allocations Proposed Submission document was published for representations in March 2012(Regulation 19). **The representation period ran for 6 weeks between 15th March and 1st May 2012.**

Alongside the proposed submission document was an updated sustainability appraisal report and consultation statement setting out the previous stages of consultation on the plan and showing how previous responses have been taken into account (Regulation 18)¹.

This statement focuses on the final representations to the plan and sets out:

- which bodies and persons the local planning authority invited to make representations
- how those bodies and persons were invited to make representations
- a summary of the main issues raised by the representations
- a summary of individual representations with a Council response and summary of proposed modifications

Who were informed and invited to make representations?

- The Specific Consultation Bodies that the Council invited to make representations are listed in **Appendix 1**
- General Consultation Bodies that the Council invited to make representations are listed in **Appendix 2**.
- Also invited to make representations were those who had previously commented on the plan , interested parties who had asked to be kept informed and contacts on our LDF database(including individuals and landowners/consultants/agents):in total c.585 emails and c.460 letters
- Ward Councillors
- All addresses within 30m of each site (c. 8,200 letters)

How were representations invited?

The availability of documents and the period for the submission of representations was publicised:

- by local advertisement in the Camden New Journal
- on the Council's website
- by direct notification (by letter and/or email-see above)

¹ This separate statement dated March 2012 also forms part of the submission to the Secretary of State and is available to view on our website.

- placing documents in Camden Town Hall and in Camden libraries

The Council also ran walk-in sessions for members of the public to talk with planners about the document at the Town Hall Extension. These took place on:

- Tuesday 27th March between 10am and 1pm
- Wednesday 28th March between 10am and 1pm
- Thursday 29th March between 10am and 1pm

A standard representation form (accompanied by guidance notes) was provided. Representations could be submitted online, by email or post. A publication statement was also included inviting those who wished to be notified of subsequent submission and examination to inform us.

Summary of main issues

The Council notified the specific consultation bodies as prescribed in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012) and responses are briefly summarised below;

Specific Consultation Body	Summary of Response
The Mayor of London	The document is in general conformity with the London Plan. Further detailed comments relating to transport matters were included and are outlined elsewhere in this document.
The Coal Authority	No comments
Civil Aviation Authority	No comments received
The Environment Agency	Find the Plan to be sound and legally compliant. Specific comments are outlined elsewhere in this document.
English Heritage	Welcomes the approach taken by the Council. Raises a number of points of clarification that are outlined/addressed elsewhere in this document.
Natural England	Welcomes related elements of the plan and make a number of suggestions on the Sustainability Appraisal and confirm that an appropriate Habitats Assessment has been carried out. Other comments are outlined elsewhere in this document.
Network Rail	No comments received
Highways Agency	No comment
Thames Water	No comments received
National Grid	Identified four sites affected by high power underground transmission cables
Mobile Operators Association	No comments received.
British Waterways	Support the general principles relating to improvements to the canal environment in the borough.
Camden NHS Primary Care Trust	Comments received in relation to a specific site (site 6)
London Borough of Barnet	No comments received.
London Borough of Brent	No comments received.

London Borough of Hackney	No comments received.
London Borough of Haringey	No comments received.
London Borough of Islington	Supports the manner in which Islington and Camden Councils have engaged on cross-boundary issues during the development of the Plan.
City of London	No comments received.
City of Westminster	No comments received.

The Council received 128 representations from 73 respondents including the Specific Consultation Bodies.

Many of the responses are positive and support the plan and many suggest changes that would aid clarity and/or add to contextual information/background to support guidance. The majority of the other individual representations relate to a specific site; either from developers/landowners seeking further emphasis on particular policies and guidance to give greater support to future development proposals and/or to promote other uses; or from interested parties/local residents expressing concerns about the impacts of potential development and/or uses. The highest number of responses relate to two sites in particular:

- Camden Town Hall Extension (Site 2): which are focused on the potential demolition and redevelopment of the site, particularly with regard to heights and the impact on the area generally and the character and appearance of the Conservation Area (9 representations in total; 1 also supported by 10 other individuals/groups)
- 12-42 Southampton Row & 1-4 Red Lion Square (Site 20): which are focused on the loss of the Cochrane Theatre, which occupies part of this site (14 representations in total; 11 specifically related to the future of the theatre)

There were continued or new representations for sites to be allocated:

- 1 Regis Road
- 163 Iverson Road(new)
- Walkden House, 10 Melton St
- Midland Crescent , Finchley Road
- Central Cross, Tottenham Court Road(new)
- UCLH NHS Trust Sites: Rosenheim Building, Grafton Way; Former Royal Ear Hospital, Huntley Street; and Former Student Union Building, Huntley Street(all three new)

These comments are summarised² and the responses are set out in the following sections.

² The full representations also form part of the submission to the Secretary of State and are available to view on our website.

General

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
General/1 1 - British Waterways London	<p>Support the general principles regarding the improvement of the canal environment for those sites close to the Regent's Canal.</p> <p>Seeks contributions towards the King's Cross Canal Fund that was set up as part of the King's Cross railway lands planning application S106 to supplement the fund so that it can deliver more improvements.</p>	<p>Support welcomed.</p> <p>S106 obligations can be negotiated at detailed application stage and are subject to statutory tests depending on the nature/scale of potential impacts. The plan includes references to potential improvements where appropriate.</p>
General/3 3 - English Heritage	<p>In general English Heritage welcomes the approach taken by the Council in describing both the policy and contextual qualities of each site. However there are a number of points that need to be clarified. These are as follows:</p> <ul style="list-style-type: none"> • <i>the term 'maximise' should be amended to 'optimise' so that it accords closely with the National Planning Policy Framework (NPPF)</i> • <i>The maps included could be annotated so that they highlight where heritage assets existing both on site and in their surroundings.</i> • Needs clarification relating to the issue of managing tall buildings when considering each site. It has been noted that the issue of taller buildings has only been addressed in a handful of sites (e.g. Site 20, Site 35 and Site 36). NPPF paragraph 157 advises <i>the development of Local Plans to crucially identify land where development would be inappropriate</i> • <i>Both Core Strategy and Development Management policies should be referenced (e.g. CS14 and DP25). Examples of sites where this approach would be most relevant include Site 2 and Site 3.</i> • It is welcomed that where relevant conservation area designations are identified, and that a reference is made to conserve and enhance those elements that make a positive contribution. <i>Useful to clarify further those elements which are important to conserve and which contribute to the significance of the conservation area designation in terms of individual or groups of buildings and spaces.</i> 	<p>General support welcomed</p> <ul style="list-style-type: none"> • Comments noted and modification of relevant text is recommended • It is intended that the adoption version will include further images and maps to assist interpretation. • All of Camden is considered sensitive in respect of tall buildings and there are no areas where tall buildings are explicitly supported and a design and contextual approach is taken to specific proposals. The approach to tall buildings was examined as part of the Core Strategy and Development Policies and is set out in relevant policies and supplementary guidance. This plan is not considered the appropriate vehicle to review this approach and identify land where particular development would be inappropriate. This plan's primary objective is to be positively prepared to support growth and appropriate

		<p>development by allocating sites for development. The guidance is intended to highlight broad contextual , heritage issues and strategic view issues so that these can be taken on board in understanding areas and sites and in producing acceptable proposals</p> <ul style="list-style-type: none"> • There is a desire to keep information and guidance as succinct as possible and avoid duplication where more detailed appraisal , guidance and analysis are and can be referenced e.g. design guidance, respective CA appraisals and management strategies, frameworks/briefs, AAPs etc. <p>Proposed modifications: Amend “maximise” to “optimise” where appropriate and reference to policy DP25 added where appropriate. Contextual text in respect of heritage assets amended throughout document as appropriate in relation to these and other representations.</p>
<p>General/11 6 - Environment Agency</p>	<p>We find the plan to be sound and legally compliant. We have made site specific representations on only four of the site allocations, supporting their inclusion and recommending only minor changes to the site allocation text (in each case this is included in section 9 ‘other comments’). The changes suggested are primarily ensure the site characteristics and design requirements take account of the canals and the opportunity these afford to improve biodiversity and increase the boroughs green infrastructure.</p> <p>The Surface Water Management Plan (SWMP) has not been used to inform your site selections or allocation text as it is not recognised in Appendix B (of the sustainability appraisal) as a relevant plan or programme. Although we do not find the Site Allocation plan unsound on this basis, <i>we urge you to review your SWMP and ensure the site allocation plan takes this evidence into account.</i> This is a general comment and applies to</p>	<p>Support welcomed. The SWMP was under preparation during the later stages in preparation of this plan and it has been reviewed in updating and finalising our published submission document. There is a reference to historic flooding in the West Hampstead, Gospel Oak and Highgate Road areas (sites 31, 42 and 43) although the sites were not in the directly affected areas. Other identified areas at risk of flooding do not coincide with allocations. The submitted</p>

	<p>the whole of the plan.</p> <p>Consideration should be given as to whether, in light of the specific surface water problems in your borough it would be appropriate to set local standards over and above those set by the London plan.</p>	<p>Sustainability Report has been also reviewed and updated. See also NPPF compliance checklist in respect of flood risk assessment. This plan is not the appropriate vehicle to establish new development standards and this is appropriately done through future review of current development policies and standards in the light of the new SWMP.</p>
<p>Site Allocations DPD/26</p> <p>8 - Greater London Authority (SEE PDF 26 - GLA)</p>	<p>The Site Allocations DPD submission version contains many positive aspects and the comments raised in the previous consultation rounds have been sufficiently addressed. Minor alterations and clarifications relating to transport infrastructure, are encouraged. In summary, the document is in general conformity with the London Plan.</p> <p>The area around Euston Station is recognised as an area of change with policies that could be subject to alterations depending on the future production of an Opportunity Area Planning Framework, although the document notes that the general principles set out within should continue to apply to any future development. This is acceptable.</p> <p>Mixed-use development is also encouraged within town centres and areas with good transport links. The retention of community facilities and viable employment sites is welcomed.</p> <p><i>Transport for London has raised specific queries for several of the sites. In summary these focus on technical matters to safeguard land and conditions for the future HS2 line, and bus, Underground and Overground network infrastructure, including the potential future Chelsea-Hackney line.</i></p>	<p>Welcome positive comments and confirmation of conformity. Proposed modifications have been put forward to address transport related comments-see individual sites</p>
<p>General/35</p> <p>8 - Greater London Authority</p>	<p>There are a number of potential constraints on the redevelopment of sites situated close to underground tunnels and infrastructure. It will need to be demonstrated to the satisfaction of London Underground Ltd (LUL) engineers that development will not have any detrimental effect on LUL tunnels either in the short or long term; the design must be such that the loading imposed on the tunnel structure is not increased or removed.</p>	<p>The plan where relevant highlights potential constraints and relevant adopted safeguarding proposals. Appropriate consultation will be encouraged and undertaken at design/planning stages.</p>
<p>General comment/36</p>	<p><i>TfL considers that the site location plans used throughout the document could be made clearer.</i> It is not always easy to identify the location of the sites, unless the reader is already familiar with the local area.</p>	<p>Noted.</p> <p>Proposed modifications: It is proposed</p>

8 - Greater London Authority		that the adoption version should include updated/ clearer maps to assist interpretation and reflect the final Policies Map
General/17 9 - Highways Agency	The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network (SRN). We have reviewed the consultation and do not have any comment at this time.	Noted. None of the sites have an identifiable impact on the SRN. The specific impacts of proposals on road networks can be undertaken as part of relevant Transport Assessments. No changes required.
General/21 12 - National Grid	<p>The following sites identified in the Proposed Submission document are crossed by one of National Grid's high voltage underground electricity transmission cables:</p> <ul style="list-style-type: none"> - Site 01: Kings Cross Growth Area - Site 07(sic: should be 6): 4 St Pancras Way (St Pancras Hospital) - Site 36: Hawley Wharf and 39-45 Kentish Town Road - Site 47: St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir <p>Advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments and engage with National Grid at early stages.</p>	<p>Noted and existing references to affected sites in proposed submitted plan should be amended</p> <p>Proposed modifications: Amend wording - delete "in proximity to " with "crosses" (p. 15,31,137 and 169)</p>
General/22 13 - Natural England	<p>Under managing growth there is reference protecting and improving parks and open spaces which are welcomed as is the reference to public open spaces under the Viability and Mixed Use Development Section. Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. <i>This could be made explicit in the Site Allocations document, helping to ensure the borough's green infrastructure is designed to deliver multiple functions.</i></p> <p>In respect of individual sites, of which there are 40/41 listed within the document, Natural England will comment as the applications are brought forward and more specific details and uses are provided.</p>	<p>The plan is premised on the Core Strategy where there is more detailed policy and guidance in support of biodiversity and the natural environment. Wherever possible and relevant this plan refers to potential impacts and opportunities to protect and support biodiversity in relation to specific sites.</p>

Habitats Directive Assessment

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Habitats Directive Assessment /24 13 - Natural England	<p>Camden have carried out an Appropriate Screening opinion for the Site Allocations Planning Document, under the Habitats Regulation which is to be encouraged. The approach and methodology used are in line with advice that would be offered by Natural England and is therefore acceptable. Chapter three concludes that stage two and three of the Habitats Regulation Assessment, requiring full Appropriate Assessment is not required and in this instance and in respect of Site Allocations Planning Document Natural England can accept and agree this conclusion.</p>	Confirmation that approach to Appropriate Assessment is acceptable welcomed.

Sustainability Appraisal

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Sustainability Appraisal/23 13 - Natural England	<p>Chapter 4: Baseline Characteristics Under the Environment section there is little or no reference to open/green space or ecology, this section appears to relate to architecture and waste. Although there is reference to open space, parks, flora and fauna later in the document, <i>the Council may wish to add them here or change the heading.</i></p> <p>Challenges Faced (Table on pages 9 – 15) Under the environmental section, Natural England is pleased to see the recognition that areas of the borough are deficient in access to nature and green space, provision of green infrastructure as part of a holistic approach to development planning can help alleviate some of these deficiencies. Also under this section the reference to biodiversity and priority species issues and the aspiration to enhance and increase habitats is welcomed and supported.</p> <p>Chapter 5: The Appraisal Process Under a sustainable Camden that adapts to a growing population is the objective “to improve and protect Camden’s parks and open spaces and promote diversity of plant and animal species in the borough”. This is welcomed and supported.</p> <p>Sustainability Objectives and Criteria Sixteen Objectives are listed which can be broadly supported and cover the areas and issue that Natural England would expect to see considered by such a document, particularly welcomed is Objective 12 “To protect and enhance existing habitats and biodiversity and to see to increase these where possible”.</p>	Support welcomed. The Sustainability Report has been further reviewed and updated.

Camden's Spatial Objectives

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Managing Growth and Growth Areas and Development Sites/25 14 - Sport England	Sport England welcome the Council's approach to provide an appropriate mix of uses, including community facilities (set out in the Camden's Spatial Objectives – Growth Areas and Development Sites). The area covered by the AAP also offers great opportunities for improving access for a range of formal and informal sports and recreation, such as walking, cycling and water sports.	Supportive comments welcomed. No changes required

Site Allocations

Criteria for Site Selection

Development Policies and Standards (p.12)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Development Policies and Standards/127 72 – Paragon Group Co Ltd	<i>Suggest policy with regard to 'car free' residential developments is changed.</i> Preferable to insist that all new developments have to provide off-street parking for a majority of the flats, and a designated bicycle storage area. These new developments could then be 'permit free'. Please give this your consideration.	This plan is not establishing new development standard policies and is therefore not the appropriate vehicle to reconsider the "car free" policy, which is an existing policy in the development plan.

Site Schedule

Site 1: King's Cross Growth Area (p.15)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 1: King's Cross Growth Area/112 3 - English Heritage	As previously highlighted we welcome the reference to the many buildings of architectural or historic interest found on site, however the level of detail provided on the contextual qualities of the site and its surroundings is limited. It should be noted that there are a number of heritage assets which surround the site both in LB Camden and LB Islington. <i>Consideration of the setting of these heritage assets and their relationship with the development of the site should be recognised</i> in the context of how this site will continue to be developed.	The allocation is based on the already granted outline permission and emerging detailed elements. There is a desire to keep information and guidance as succinct as possible and avoid duplication where more detailed appraisal, guidance and analysis can be referenced e.g. in planning application information, design guidance, respective CA appraisals and management strategies, frameworks/briefs, etc. though contextual information could be

	<p><i>It would be welcomed if English Heritage was recognised as a key partner in delivering significant change at this site.</i></p>	<p>enhanced</p> <p>This is recognised and a modification is suggested. The Duty to Co-operate Statement also highlights the important role of English Heritage in the preparation of this plan and in relation to this identified strategic matter.</p> <p>Proposed modifications: Amend wording to refer to consideration of setting of heritage assets and reference to role of English Heritage</p>
<p>Site 1: King's Cross Growth Area/2</p> <p>10 - Islington Council</p>	<p>Confirm Islington Council's support for the manner in which officers from both Islington and Camden councils have engaged on cross-boundary issues during the development of Camden's Site Allocations DPD. The two boroughs have collaborated over a number of years to bring forward the comprehensive redevelopment of King's Cross. Islington Council is developing plans which aim to complement the objectives and policies of Camden's Core Strategy, Development Policies and Site Allocations.</p>	<p>Support welcomed. The Duty to Co-operate statement also highlights this joint-working.</p>
<p>Site 1: Kings Cross Growth Area/12</p> <p>6 - Environment Agency</p>	<p>We support the inclusion of a reference to 'Open Spaces: - Public: Regent's Canal (Metropolitan Site of Nature Conservation Importance)' in the Planning Designations section.</p> <p>We would recommend that as with other sites within this document <i>the need for new development to enhance the canal setting in terms of public space/access and biodiversity should be mentioned specifically</i>. This is supported by London Plan policy 7.28 'Restoration of the Blue Ribbon Network' and paragraph 109 of the National Planning Policy Framework which recognises the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p>	<p>Support welcomed.</p> <p>Proposed modifications: Include reference to canal</p>
<p>Site 1: Kings Cross Growth Area/27</p> <p>8 - Greater London Authority</p>	<p>TfL welcomes the inclusion of a reference to the 'Legible London' scheme and 'Improvements to the bus network', as previously requested at the preferred approach stage.</p>	<p>Comment welcomed</p>

Site 2: Camden Town Hall Extension, Euston Rd/Argyle Street(p.19)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/37</p> <p>15 - T W Reynolds</p>	<p>Concerned about the future of the 1970s Town Hall Annexe. Important to protect the setting of Grade I Listed buildings and in the context of Conservation Area policy and that the bulk and impact of any new proposed building is considered in the context of the St Pancras Chambers building and any replacement for the Town Hall Annexe is the same size and not larger. <i>Any reference to increasing floorspace should be removed and replaced with a statement which specifically refers to respecting rooflines, the height and scale of neighbouring buildings, and, in particular, listed buildings.</i></p> <p>Agree that any new building must "fully appreciate and respond to the setting of the Grade I listed St Pancras and Kings Cross Stations, and Grade II listed Town Hall and nearby listed terraced housing." A limit placed on any new building to the size of the current one would be the appropriate policy to deliver this objective.</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these and other related comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/38</p> <p>16 - U Clancy</p>	<p>Fully supports the group response submitted and the points raised. The effect of a taller building in terms of reduced light would be drastic. In addition to protecting the setting of a Grade 1 listed building and preserving existing local rooflines, there needs to be consideration of the impact on local residents whose homes would be significantly and adversely affected by such a development.</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities</p>

		<p>of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/39</p> <p>17 – G Maeer</p>	<p>As currently drafted the guidelines indicate that the planning authority would prefer to see demolition of the current building over refurbishment. The case for demolition has yet to be made. As currently drafted the guidelines indicate that the planning authority would prefer to see the current building replaced by a taller building. A tall building would not be in accordance with “Conservation Area Statement 22 – King’s Cross” which states that “New development should respect ...existing features such as ...roof lines...” and that “Developments which are overtly modern will not be resisted, provided they have regard to the layout, height and scale of existing development within the Conservation Area”.</p> <p>A taller building on the site of the Town Hall Extension would also set a precedent for the buildings to the east, in front of Kings Cross Station and completely alter the character of the station area. A taller building than the current Town Hall Extension would detract from the grandeur of St Pancras Chambers. Arguably, the current relatively modern but plain façade of the Extension offsets the Victorian Gothic of the St Pancras rather well. A replacement isn’t needed to ‘complement’ the station building.</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/40</p> <p>18 - King's Cross Conservation Area Advisory Committee</p>	<p>The extension site is in an area which contains some of the most important historic buildings in the country. A tall building by virtue of its height, mass, bulk and footprint would have an overly dominant and intrusive impact on the setting of several listed buildings in the immediate area and disrupt the balanced harmony between these and other existing buildings and the urban spaces which define the character of this part of the King's Cross Conservation Area.</p> <p>As such the building would be materially detrimental to the character and appearance of the area contrary to policies of Camden's Local Development Framework Policies.</p> <p>Conclusion.</p> <p>There should be no increase in height of a new building on the extension site.</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered</p>

	<p>KXCAAC joins with the representations of the Friends of Argyle Square on the points made relating to conservation and they will not be repeated here.</p>	<p>necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/41</p> <p>19 – P Thomkins pp St Pancras Chambers Residents Association</p>	<p>The relevant Conservation Area principles here are: Conservation Area Statement 22 – King’s Cross. The site allocations consultation document makes no reference to “roof lines”. We believe the reference in the site allocation document to increasing floor space is incompatible with the bulk of the building when compared to existing roof lines. Our belief is that the scale of our building, directly across from the Town Hall Extension, is the right reference point and that any new building should be of no greater than a similar scale to our own.</p> <p>Paragraph 2 of Further Information refers to the “scale and grandeur of St Pancras Chambers”. It is our view that a building of scale and grandeur on the site opposite us would be appropriate but not of greater scale than our own. As we say above, a building of similar bulk to our own should be the standard against which any new development be measured.</p> <p>The document is slanted to show that the site is in a location where a tall building would be appropriate. <i>The Development Brief should clearly specify that the height of any new building should be no greater than that of the current building.</i> There are a number of buildings on the south side of Euston Road which may come under future development pressure. A tower block on the Town Hall Extension site could over time lead to follow-on developments which result in a high “wall” confronting St Pancras and King’s Cross, and towering over the low-rise residential streets behind.</p> <p>We fully agree that any new building should “...fully appreciate and respond to the setting of the Grade I listed St Pancras and Kings Cross stations and Grade II listed Town Hall and nearby listed terraced Housing”. It should be quite clear that permission would not be given for a building which dominates those stations or the town hall.</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/42</p>	<p>Fully support Friends of Argyle Square response. Fear plans for a high storey tower to replace the existing building in order to pay for the new council offices. A tower will overshadow St. Pancras, set a precedent for the area for height and to demolish rather than refurbish is environmentally unsound. The building that is there looks interesting and</p>	<p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater</p>

<p>20 – K Solomon J and B Paul</p>	<p>adds to the character of the area. To demolish it and build a high rise tower is short sighted.</p>	<p>emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/43</p> <p>21 - Friends of Argyle Square</p>	<p>Special care must be taken to ensure the Council do not abuse their position of planning authority for the site. The Town Hall Extension has the potential to be an extremely high value site in this prime location. Planning must not be led by the needs of Camden's property department. Concerned that guidelines show contamination from the sales process and paragraphs 2 and 3 of Further Information aggressively make the case for a large development.</p> <p>There are no planning guidelines regarding building heights that would protect this extremely sensitive site, and not happy to leave this crucial decision to the vagaries of the planning application process. Recognise and accept that when Camden sells the site they are duty bound to sell it for maximum value but this will be within the constraints provided by the Planning department. The Planning guidelines as laid out in the Site Allocations document have to be robust enough to resist the greed of developers and Camden's sales department.</p> <p>Summary of main points:</p> <ol style="list-style-type: none"> 1. Conflict between Council as landowner and planning authority. 2. Should be subject of planning brief/planning framework 3. There should be a height limit imposed on the site. 4. Should more accurately reflect Conservation Area Statement 22 – King's Cross in respect of guidance on rooflines, existing character and context 	<p>The role of Council as landowner and local planning authority are distinct and this plan must be based solely on planning considerations and adopted policies. The plan also contains other Council sites with ownership interests (Sites 7, 30, 32, 35, 42 and 43) and no similar concerns have been raised that the interests of the Council as landowner are overriding local planning policies or promoting unacceptable development.</p> <p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the</p>

	<p>5. Current wording and context is biased and gives indication that the site is in a location where a tall building would be appropriate and a tall building could be acceptable</p> <p>6. There is local opposition to a tall building</p> <p>7. Concerns about precedent and other sites that would come under pressure for replacement with more tall buildings</p> <p>8. Overreliance on Central London context and other examples –such as relationship to Kings Cross Central and Growth Area- to justify a tall building</p> <p>9. If the building fails architecturally to the extent that it must be demolished then it is essential that guidelines ensure that the replacement building does not make the same mistakes.</p> <p>10. Bias in favour of demolition and insufficient recognition that retention/renovation/refurbishment is an option and more sustainable</p> <p>11. Location in relation to Bloomsbury Conservation Area needs to be emphasised</p> <p>12. References to Council offices should be clarified/consistent</p> <p>13. Unhappy with architectural aspirations expressed in the phrases used.</p> <p>14. Consider consultation process flawed</p> <p>15. Lack of clarity and meaning in some wording/phrases used.</p> <p>Concerns/Comments in representations supported by:</p> <ul style="list-style-type: none"> • Friends of St George’s Gardens • Hillview Residents Association • King’s Cross Conservation Area Advisory Committee • C Packard - Building Manager Lumen United Reform Church • Greg Cowan – representing Living Streets – King’s Cross • A Inglis • T Mason, Swinton Street • T Rees – Chair of South Caledonian Community Association • S Owuadey, Copenhagen Street • Martin Morton – Chairman, Camden Civic Society 	<p>guidance implies support for tall buildings.</p> <p>The associated consultation statements highlight that significant consultation on the proposed submission document took place and engagement with local groups and the adjacent school continues about the future disposal of the site to consider how the potential impacts(if the building is redeveloped)can be managed.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 2 : Camden Town Hall Extension, Euston Rd/Argyle Street/104</p> <p>36 - Bloomsbury Conservation Area Advisory Committee</p>	<p>We consider the Site Allocation guidance for the Camden Town Hall Extension to be unsound. We believe the guidance is not founded on a robust and credible evidence base, nor does it necessarily present the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Summary of main points:</p> <ul style="list-style-type: none"> • Bias towards demolition and redevelopment 	<p>The role of Council as landowner and local planning authority are distinct and this plan must be based solely on planning considerations and adopted policies. The plan also contains other Council sites with ownership interests (Sites 7, 30, 32, 35, 42 and 43) and no similar concerns have been raised that the interests of the Council as</p>

	<ul style="list-style-type: none"> • Inconsistency in wording which could be misleading • Not compliant with NPPF with respect to sustainable development in relation to heritage assets • Demolition and development within the settings of designated heritage asset requires clear and convincing justification. • Questions what “an architecturally exemplar building” actually means • How will high quality development be guaranteed through the guidance • The guidance is lacking in transparency about the Council’s aspirations regarding design and height. • The guidance omits to explore the option of refurbishment and plainly encourages redevelopment. The apparent intention is to get more value from the site by constructing a taller building. • This is not guidance – this is a clear indication that Camden Council – in its role as planning authority - will favour a building of greater height and mass, which will increase the value of the site and in turn maximize the profits of the disposal. • The guidance could be seen as inappropriate lobbying for greater profit for the landowner, Camden Council itself. • Object to any reference within the guidance to increased height or additional floor space, as it pre-determines an option that will be totally unacceptable to the neighbouring communities and seriously detract from the heritage context • Context is misleading and inaccurate, particularly in implying tall buildings are located nearby and assessed primarily in the context of the Euston Road and emerging district of Kings Cross Central • There is no reference in the guidance’s context to the presence of the British Library, a relatively low-rise structure which lies in close proximity to the north west of the Town Hall site. • The most important contextual building lies immediately opposite the site. This is the recently restored 19th century St Pancras station, with its landmark clock tower. • Impact on Bloomsbury Conservation Area and any redevelopment of this site will have a specific impact on the neighbouring streetscape and the quality of life of local residents. Makes only a very brief reference to the adjacent school and residential streets. • There is no specific mention of the adjacent mansion blocks in Bidborough Street • Urban Design Objectives -this is not the city centre, high-rise, office setting that is implied by the wording. • The guidance promotes the idea of a tall building on the Town Hall Extension site, but fails to take into consideration the consequential wind effects and 	<p>landowner are overriding local planning policies or promoting unacceptable development.</p> <p>It is conceded that whilst refurbishment is included as an option in the guidance it is considered the current wording could be enhanced to give greater emphasis to reuse/refurbishment as an option and that the contextual information could be enhanced to give improved emphasis to existing context and character to allay concerns that the guidance implies support for tall buildings.</p> <p>Engagement with local groups and the adjacent school continues about the future disposal of the site to consider how the potential impacts (if the building is redeveloped) can be managed.</p> <p>There is reference to active frontages and car parking needs/traffic generation and local transport implications will depend on proposed uses and whether a basement car park is retained/proposed to be reprovided. A transport assessment (if future proposals justify one) would be required to support particular proposals.</p> <p>Further changes are considered necessary and appropriate to address these and other similar comments to give more emphasis to the sensitivities of the site and local context.</p> <p>Proposed modifications: Revisions to</p>
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	<p>overshadowing of adjacent properties.</p> <ul style="list-style-type: none"> • There is no information in the guidance relating to Camden’s urban design objectives for the Euston Road. • Constraints and opportunities- there is no guarantee that a tall building will make a positive contribution to the historic environment’s local distinctiveness; and there is no evidence that the public benefits will outweigh the harm to nearby designated heritage assets. • Despite the site’s accessibility to public transport. Parking needs have not been addressed at all. • Fails to address design of ground floor • Questions whether the site can in fact accommodate a bigger building. There is no objective proof that it can, and thus the guidance is unsound. • This is an extremely important site, which should not simply be sold to the highest bidder with the assumption (to be enshrined in a policy document) that a new tall building will be welcomed by the local authority. • The site’s future deserves input from all interested stakeholders, in particular the neighbouring community. • There should be a presumption in favour of retention of the building until a full option appraisal of the site and the development options has taken place. • The impact of demolition and rebuilding on the quality of life of the neighbouring residential community should not be underestimated. • Redevelopment is most likely to cause harm to an important heritage asset through the encouragement of inappropriate development within its setting. • A site specific Planning Brief is needed to guide future development of this significant site. 	<p>text to be put forward to address these comments</p>
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Site 3: Pentonville Road “Lighthouse” block(p.22)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 3: Pentonville Road “Lighthouse” block/19</p> <p>10 - Islington Council</p>	<p>Support for the manner in which officers from both Islington and Camden councils have engaged on cross-boundary issues during the development of Camden’s Site Allocations DPD. Islington Council is developing plans which aim to complement the objectives and policies of Camden’s Core Strategy, Development Policies and Site Allocations.</p>	<p>Support welcomed</p>

Site 5: Midland Road Site - Land to rear of British Library(p.27)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 5: Midland Road Site - Land to rear of British Library/113</p> <p>3 - English Heritage</p>	<p>Site Allocation – Suggested Approach</p> <p>We would suggest that development <i>should be expected to fully appreciate and respond to the special character and appearance of the Kings Cross/St Pancras conservation area and wider historic environment.</i></p> <p>Further Explanation</p> <p>We support the desire for high standard of design that respects the existing context. However to provide further clarity <i>we would suggest that the rigorous assessment to be undertaken with regards to the development of transitional building heights across the site, should include a reference to the significance of heritage assets. So as well as considering the impact upon the townscape of the area, the changes in building heights should also consider its impact upon the significance of heritage assets (this includes their settings). These suggested changes would ensure the advice provided reflects national policy as set out in the NPPF.</i></p>	<p>Proposed modifications: Revisions to text to be put forward to address these comments</p>
<p>Site 5: Midland Road Site - Land to rear of British Library/18</p> <p>2 - British Library</p>	<p>It is important that planning policy reflects the local, national and international importance of the BL, and the potential for its future expansion. In the long term, the BL anticipates requiring all of the land in its ownership for library use. In the short and medium term, there is potential for ‘interim’ uses, on the understanding that the land is capable of being returned to library use in the longer term.</p> <p>The BL supports the broad principles of the site allocation, which seeks to ensure development is capable of meeting future operational needs of the BL. However, residential uses may prejudice the long term ability of the BL to use the whole site for its own purposes and the BL requests that any reference to residential uses is removed from the site allocation.</p> <p>The BL supports the provision of active uses at ground floor level along Midland Road, including retail, cultural and community facilities.</p> <p>The principle of an integrated and comprehensive approach to the development of this site including improvements to east-west permeability in the area is supported by the BL.</p> <p>The BL wishes to ensure that the requirement for further east-west permeability remains flexible, and takes into account security and site constraints.</p>	<p>The supportive comments are welcomed. It is recognised that the planning brief of 2003 is now out of date and whilst circumstances have changed it contained some objectives which are still relevant and have been referred to in the context of this guidance this new guidance.</p> <p>It is recognised that the British Library will have specific aspirations and objectives for its future expansion however as this plan operates for the lifetime of the Core Strategy (2010-2025) it is considered that there needs to be some flexibility to address changing circumstances.</p> <p>The allocation supports BL aspirations and should clarify the policy approach</p>

	<p>The boundary of the BL site has changed slightly following the development of the Francis Crick Institute. A revised ownership plan is enclosed. (SEE PDF 2 – BRITISH LIBRARY)</p> <p>BL request that references to the now out of date planning brief are deleted.</p> <p>Overall, the BL supports the principles of the site allocation, but wishes to ensure that the allocation provides sufficient flexibility to enable a masterplan for the site to be developed in response to changing circumstances.</p> <p>The BL notes that the Site Context text has been updated to reflect our previous representations and the BL’s long term aspirations to develop and occupy the whole of the site in the future.</p> <p>The BL is a publicly funded body and requires all of the land in its ownership for its long-term expansion. Core Strategy Policy CS9 seeks to promote important institutional uses and therefore the flexible application of Policy DP1 in this case is welcomed. This exception is critical to the BL achieving future aspirations and is welcomed by the BL.</p> <p>Summary and Conclusions</p> <p>The BL supports the overall direction of the SA DPD. The BL wishes to ensure that the allocation for the safeguarded expansion land reflects the long term masterplan aspirations of the BL to utilise the whole site and that the allocation provides flexibility in the short term to ensure that this vision can be met.</p> <p><i>The BL requests that any reference to residential uses is removed from the site allocation.</i></p> <p><i>The BL request that references to the planning brief are deleted.</i></p>	<p>and introduce necessary flexibility to meet these aspirations, however housing will be a preferred use in the event that the full extent of land is not required or potentially becomes surplus to user requirements (DP1 para 1.23). Enhanced clarification on this matter can be provided through revised text.</p> <p>Proposed modifications: Revisions to text to be put forward to address these comments in respect of the planning brief and clarifying the application of policy in relation to housing. The submitted Policies Map includes the new site boundary.</p>
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Site 6: St Pancras Hospital(p.31)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 6: St Pancras Hospital/114 3 - English Heritage	<p>Site Allocation – Suggested Approach</p> <p><i>We would suggest that those buildings considered important are explicitly identified. In addition a requirement should be placed upon the developer to fully identify and analysis the heritage value of all existing buildings and spaces and their contribution to the character of the conservation area.</i></p>	<p>Proposed modifications: Revisions to text to be put forward to address these comments and highlight heritage aspects.</p>

	<p>Site Context</p> <p><i>Reference should be made to the setting of the adjoining St Pancras Gardens and the heritage assets it contains, plus the wider character of the Kings Cross/St Pancras conservation area. In addition either in this section or under Further Explanation the need to analysis the quality of the existing buildings and spaces and their contribution to the character of the conservation area should be explicitly referenced.</i> The concern is that the site contains a series of buildings that may not be individually designated but as a collective make an important contribution to the character of the area and the conservation area. The current wording is silent on this important issue.</p> <p>Further Information</p> <p>It should be noted that St Pancras Gardens is a grade II Registered Historic Park and Garden, and contains numerous listed structures (all grade II). The setting of this heritage asset should be a consideration for the development of the site.</p>	
<p>Site 6: St Pancras Hospital/44</p> <p>22 - NHS North Central London</p>	<p><i>The Owner of the site (since 2002) is Camden Primary Care Trust, not Camden & Islington NHS Foundation Trust.</i></p> <p><i>Existing use, 'health Authority staff' should read 'PCT staff'.</i></p> <p><i>Site context; St Pancras Hospital has been part of the NHS since 1951.</i></p> <p><i>Hospital for Tropical Diseases have only ever occupied one building on the site.</i></p>	<p>Proposed modifications: text to be corrected in response to these comments</p>

Site 7: 103 Camley Street(p.34)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 7: 103 Camley Street/115</p> <p>3 - English Heritage</p>	<p>Site Allocation – Suggested Approach</p> <p>Support the reference to the enhancement of the setting and character of the adjoining Regents Canal, <i>subject to the minor inclusion of the wording 'conservation area'.</i></p>	<p>Proposed modifications: Revision to text to be put forward to address this comment</p>
<p>Site 7: 103 Camley Street/13</p> <p>6 - Environment Agency</p>	<p>We support the inclusion of requirements to take account of the canal setting in the 'Site allocation guidance' however <i>we would request that specific reference is made to enhancing the biodiversity at this site.</i></p> <p>Please be aware that the 'canal' constraint has not been identified in Appendix D of the</p>	<p>Proposed modifications: Revision to text to be put forward to address this comment</p>

	Sustainability Appraisal	Sustainability Report amended
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Euston Station and Surrounds(p.39)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Euston Station and Surrounds/116 3 - English Heritage	<p>Council's aspirations</p> <p>We generally support the Council's aspirations for Euston, <i>however we would suggest the following minor amendment (bullet point 4)</i> so that it accords with the NPPF and the London Plan.</p> <p>Improving the safety and attractiveness of public spaces and the local environment, including the provision of open space where practicable, and providing high quality design which preserves and enhances the area's heritage <u>assets and wider historic environment</u>.</p> <p>It is still disappointing that the background text to the Council's aspirations does not make any reference to the areas historic environment and its influence upon its existing character. For example the area in front of Euston Station (facing onto Euston Road) contains a diverse range of important heritage assets, designated listed buildings and conservation areas, and non-designated assets that help define the areas sense of place. <i>We would advise that more specific reference is made to the heritage value of Euston Station and its surrounds</i>, especially in light of the significance of change expected to take place as a result of HS2.</p> <p>We note that the Council has agreed to work with the Mayor in the development of an Opportunity Area Planning Framework for the Euston area. English Heritage would welcome the opportunity to be fully engaged in the development of this important Framework, so that the heritage assets that define the site and its context are positively utilised as part of the successful regeneration of this area.</p>	<p>The fourth bullet reflects the aspirations set out in the adopted Core Strategy. The Area Plan offers an opportunity to further highlight and expand on the historic context and provide much more detailed assessment and guidance.</p> <p>Proposed modifications: Revision to text to be put forward in respect of heritage assets and historic environment</p>

Site 9: Euston Station, Euston Road(p.43)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 9: Euston Station, Euston Road/117 3 - English Heritage	<p>Further Information</p> <p>A key omission from the current guidance relates to the potential attraction of the site for tall buildings. It is noted that development above the station is suggested with an emphasis upon high quality design that achieves greater legibility between the station and</p>	<p>Proposed modifications: Revision to text to be put forward to give greater emphasis for the need for over station development to consider its impact upon the significance of heritage assets and</p>

	neighbouring buildings and spaces. The concern is how the expectation of increased legibility is articulated in terms of building height, scale, form, orientation and overall design. It is appreciated that the Euston OAPF will provide, in time, details, but at this stage greater reassurance is required so ensuring the significance of heritage assets in the site and beyond are not inadvertently compromised or harmed. This could be achieved by <i>including a reference in the text that highlights the need for over station development to consider its impact upon the significance of heritage assets.</i>	strategic views.
Site 9: Euston Station, Euston Road/45 23 - Sydney & London Properties	<i>We believe there should be an additional second sentence “Sydney & London Properties Limited produced a Vision Masterplan in 2008” inserted after “British Land and Network Rail announced a partnership for significant redevelopment of the station in April 2007”. The remaining part of that paragraph is then correct and balanced in relation to the context of the work undertaken, the roles of the various parties, and their status as key stakeholders in the Euston Area.</i>	Proposed modifications: Revision to text to be put forward to insert reference.
Site 9: Euston Station, Euston Road/72 45 - University College London (UCL)	The proposed redevelopment of Euston Station offers the potential to provide additional floorspace for higher education uses and student accommodation. <i>UCL ask that the site is amended to include higher education uses and an element of student accommodation.</i>	Development at Euston offers a significant opportunity for genuinely mixed use development. Housing is identified as a priority use, but the guidance is intended to provide support and sufficient flexibility for other appropriate uses. The Area Plan will help to establish more detailed policy principles and guidance. No change proposed.
Site 9: Euston Station, Euston Road/28 8 - Greater London Authority	While the inclusion of the following sentence is supported ‘Schemes should facilitate improved interchange between different modes of transport, including public transport and walking and cycling, and should provide a long term solution for the effective movement of buses through the Euston area...’, TfL would reiterate its request for the use of site 9 (Euston Station, Euston Road) to explicitly include reference to a bus station, as this is considered to be an important piece of transport infrastructure. This section makes strong reference to HS2 and its proposed terminus at Euston station. As with all sites close to the HS2 alignment, any development that takes place should be consistent with HS2’s proposals, and HS2 Ltd should be consulted on all developments adjacent to the proposed alignment.	Development at Euston offers significant opportunities to look at a whole range of local transport interchange issues, facilities and improvements. The Area Plan offers an opportunity to further address and expand on local transport implications and opportunities and provide more detailed requirements and guidance. As highlighted the Council has very significant concerns about the HS2 proposals and the local impacts and is challenging the

		<p>proposals as they currently stand. Consultation with HS2 Ltd will need to take place in accordance with safeguarding provisions.</p> <p>Proposed modifications: Revision to text to be put forward regarding bus station/transport interchange</p>
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Site 12: 110-122 Hampstead Road (Former National Temperance Hospital)(p.47)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 12: 110-122 Hampstead Road (Former National Temperance Hospital)/46</p> <p>24 - Howard House & Cleveland St (north Neighbourhood Watch)</p>	<p>The text omits English Heritage's comments on the local significance of this site. The National Temperance Hospital is "of clear local significance," (167142, 12-DEC-2008)" This ought to impact upon the local authorities' attitude toward the site and reflect the local scope of the Council remit. It cannot be that Councils only protect heritage sites of national significance. Particular emphasis should be placed on the "Conservation-led" regeneration in any scheme.</p> <p>That the document advocates enhancing historic assets while contemplating significant alteration to historic sections is contradictory. It is entirely "feasible" for Camden Council to protect the pre-war majority of what is locally significant historical interest. The LDF document acknowledges buildings of historical interest and aesthetic appeal as criteria to apply to buildings, which clearly includes to the National Temperance with the removal of the mid-late twentieth century accoutrements. The centre ground affords opportunity for new construction or could be incorporated into St James Garden – two thirds of which is threatened by HS2. It is disappointing that Camden Council is so Cavalier with our architectural heritage.</p>	<p>The property is not in a Conservation area nor is it listed (and has been assessed by English Heritage). It is recognised that it has some historical interest and the guidance states that conservation led schemes should be considered. The Council is establishing criteria for "local listings" and embark on a process of identifying non-statutory local heritage assets and this could be put forward and considered for such a designation, which would be a material consideration in assessing future proposals. The guidance also recognises the potential implications of HS2 and the Area Plan will help to establish more detailed policy principles and guidance within the area. No change proposed</p>
<p>Site 12: 110-122 Hampstead Road (Former National Temperance Hospital)/48</p>	<p>The former National Temperance Hospital site is of local historical and architectural significance. Section 12 of the National Planning Policy Framework urges local authorities to take into account the significance of non-designated heritage assets when determining an application. While the main building and the Insull Wing are two different styles they are both, in their own right, worthy of recognition and protection. This should be acknowledged</p>	<p>The property is not in a Conservation area nor is it listed (and has been assessed by English Heritage). It is recognised that it has some historical interest and the guidance states that</p>

<p>25 - Central Camden CAAC/Res Assn for Camden Central/Regents Park CAAC</p>	<p>in Camden Council's Sites Allocations policy document. NPPF incorporates many of the essential ideas of PPS-5 and attention is drawn to para 79 of English Heritage's 'Planning for the Historic Environment Practice Guide' which advises on the benefits of a scheme that incorporates among other things:</p> <ul style="list-style-type: none"> • The sustaining of the significance of a heritage asset. • The reduction or removal of risk to a heritage asset. • Securing the optimum viable use of such an asset in support of its long term Conservation. • That the design should make a positive contribution to character, quality and local distinctiveness of the historical environment. <p>And, it should better reveal the significance of a heritage asset and therefore enhance our enjoyment of it and the sense of place. So far we have seen little understanding of such needs from the ill thought out plans of HS2.</p>	<p>conservation led schemes should be considered. The Council is establishing criteria for "local listings" and embark on a process of identifying non-statutory local heritage assets and this could be put forward and considered for such a designation, which would be a material consideration in assessing future proposals. The guidance also recognises the potential implications of HS2 and the Area Plan will help to establish more detailed policy principles and guidance within the area No change proposed.</p>
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Site 13: 1-39 Drummond Crescent (Euston Traffic Garage)(p.56)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 13: 1-39 Drummond Crescent (Euston Traffic Garage)/49</p> <p>26 – Mayor's Office for Policing and Crime/Metropolitan Police Service (MOPC/MPS)</p>	<p>On behalf the Mayor's Office for Policing and Crime/Metropolitan Police Service (MOPC/MPS) The MOPC/S provide a vital community service and as such policing is recognised within the adopted Core Strategy (2010) and the London Plan (2011) as being an integral part of Social Infrastructure. The ability to ensure safe and secure communities which can be achieved through delivery of the MPS' Estate Strategy.</p> <p>It is considered that the draft allocation does not fully reflect the adopted Camden Development Plan, comprising the Core Strategy and the Development Policies document in particular. The following representations are hereby made in order to resolve this, and allowing the final Site Allocations DPD to be considered 'sound' in this regard.</p> <p>The MOPC/MPS support the inclusion of Euston Traffic Garage within the draft Site Allocations DPD.</p> <p>The site comprises the Euston Traffic Garage, currently within operational use and provides an operational policing function. It is therefore defined as a community use within Core Strategy Policy CS10. This reflects London Plan Policy 3.16 regarding social infrastructure provision. Whilst the site harbours a limited employment capacity, there is no planning policy requirement to provide replacement employment floorspace through the site allocations process. It is demonstrated that no policy requirement to provide replacement employment or community floorspace exists in respect of this site. By</p>	<p>It is considered that whilst the police provide an obviously important public and social function this building is not a community/D1 facility. It is considered a B8/sui generis use as it operates principally as a depot/car storage facility and as such would be considered under relevant employment policies and guidance which generally seek retention and/or replacement of employment floorspace depending on a range of factors. Due to the nature of the site a non-residential use would probably be more appropriate at ground floor /street frontage level and this could include identified uses. Redevelopment for housing is supported and policy CS6 includes student housing within the definition of housing (6.5 p.48) and student housing may be an acceptable</p>

	<p>requesting replacement provision, the emerging Site Allocations Document does not reflect the adopted Local Development Framework. An amended appropriate use allocation is therefore provided. It is further considered that the preferred range of housing uses on the site should be extended to include other forms of housing including student accommodation.</p> <p>Paragraph 6.25 of the officer's report to committee (ref 2011/5695/P) concluded that student housing growth in this ward is expected, mindful of Development Policy DP9 requirements determining preferred location for student accommodation. Mindful of the above, the site should be promoted for a mix of housing, including student accommodation.</p> <p><i>An amended appropriate use allocation is therefore provided below.</i></p> <p>The following alteration to the emerging Site Allocation DPD is therefore required (deleted text struck through, new text in bold): -</p> <p style="padding-left: 40px;"><i>"A mixed use development including flexible employment floorspace, permanent residential (including affordable housing), student accommodation, and/or community uses including school use."</i></p>	<p>component subject to policy criteria as stated.</p> <p>Proposed modifications: amendment to text to be put forward to address these comments in respect of employment use and student housing</p>
<p>Site 13: 1-39 Drummond Crescent (Euston Traffic Garage)/29</p> <p>8 – Greater London Authority</p>	<p>Safeguarding for the Chelsea- Hackney Line is currently under review and is due to be refreshed in 2013. As part of the review the safeguarded route could serve Euston and St Pancras through a double-ended station. Any potential change in the safeguarded alignment could affect this site in the future.</p>	<p>Proposed modifications: text to be put forward to include reference in Euston area context</p>

Site 15: Land at Goldsmith House and adjoining land, Cumberland Market Estate, Park Village East / Augustus Street(p.60)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 15: Land at Goldsmith House and adjoining land, Cumberland Market Estate, Park Village East / Augustus Street/50</p>	<p>The allocation of Site 15 for housing is important, and in principle, well made.</p> <p>However, as drafted, the allocation includes a number of measures that will make the site less efficient and which will serve to prevent it reaching its full potential. In addition, the allocation places burdens on the site are not justified with respect to planning policy or site specific constraints. Our comments on the site allocation are as follows:</p> <ol style="list-style-type: none"> 1. The allocation should make clear that residential development across the site is 	<p>Support welcomed. Further clarification in text is proposed to address these comments .</p> <p>The whole site is identified and is therefore suitable for development including housing and any associated replacement uses and is not restricted</p>

27 – Peabody Trust	<p>acceptable to achieve the required density of development on this site, and that it is not restricted to the portion of the site occupied by Goldsmith House.</p> <p>2. The site is already subject to significant constraints following its inclusion within the extended Regents Park Conservation Area. To require the site to provide enhanced levels of open space, increased community provision and participate in a combined heat and power scheme will all serve to overburden any residential scheme, and reduce the amount of units that can be delivered on this highly sustainable site.</p> <p>3. The reference to the adjacent allotments is too detailed and given too much prominence</p> <p>4. The reference to proximity of any new scheme to the southern boundary of the allotments is also over prescriptive, and reduces development potential of the site.</p> <p><i>Propose that the text for the Site 15 Allocation is amended to incorporate the amendments set out in the detailed response</i></p>	<p>to one part. The plan recognises that viability of development is a key issue and that some potential requirements may have a higher priority than others and these need to be weighed up in the context of detailed proposals and potential impacts.</p> <p>The allotments form part of a formal open space designation and policy relating to open space designations also makes reference to development immediately adjoining designated open space. It is therefore considered appropriate to highlight this within the Site Allocation guidance.</p> <p>Some minor changes to text may assist in clarification</p> <p>Proposed modifications: Revision to text to clarify site address and address these comments</p>
Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 15: Land at Goldsmith House and adjoining land, Cumberland Market Estate, Park Village East / Augustus Street/16</p> <p>7 – RP Frontistery Institute</p>	<p>Cumberland Market, car park outside shops, Stanhope Parade or any existing open space very close by for the resurrection of Cumberland Market as it should be Section 106 gives the locals first refusal. Type of market stalls, recycled furniture, antiques, boot sale, books, food, etc, room for local arts and crafts, especially concerned with heritage and culture, affordability, education and opportunities for young and old, very little carbon footprint, sustainable, local expertise already here, bringing money education and joy into the area, could be great for disadvantaged will rent, or buy, grants availability info also required please, transport strategy could be available. Won't take no for an answer. Good regeneration.</p>	<p>Comments noted and allocation addresses may relevant issues</p>

Central London(p.65)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Central London/118 3 - English Heritage	<p>Council's aspirations</p> <p>Support the council's intention of preserving and enhancing the area's historic environment, (bullet point 9) subject to the following minor changes so that the text is in compliance with the NPPF.</p> <p>Preserve <u>Sustain</u> and enhance the area's <u>heritage assets and the wider</u> historic environment</p>	<p>These aspirations are those specifically identified in the adopted Core Strategy. Further wording can be inserted elsewhere to reflect comment.</p> <p>Proposed modifications: Revision to text to address this comment</p>

Tottenham Court Road Area(p.67)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Tottenham Court Road Area/119 3 - English Heritage	<p>Council's aspirations-As advised in our response to the Core Strategy Proposed Submission (our letter dated 26th November 2009), we generally support the Council's aspirations for Tottenham Court Road Area, however in line with our previous comments to the Site Allocations document <i>we would suggest the following minor amendment (bullet point 4)</i> so that it accords with the NPPF and the London Plan.</p> <p>Development of the highest quality, sustainable design, as befits a historic area in the heart of London, which preserves local amenity and seeks to enhance and preserve <u>its heritage assets, such as conservation areas and listed buildings and their settings.</u> the character and appearance of conservation areas.</p> <p>Welcome the reference to English Heritage's study on Conservation-led Regeneration Options for Eastern Oxford Street (Hanway Street). We would encourage the Council to utilise the findings from this Study in this document and other relevant planning documents in order to ensure a conservation-led approach to regeneration for this area gains appropriate material weight.</p>	<p>Support welcomed.</p> <p>Proposed modifications: Revision to text to address this comment</p>

Site 16: St Giles Circus(p.69)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 16: St Giles Circus/10 5 – Denmark Street	<p>The response to the submission by the Denmark Street Partnership has omitted to refer to the suggestion that conversion to residential be supported above ground or first floor level.</p>	<p>The wording in the March 2012 proposed submission document makes references to supporting new housing and restoring/converting properties to</p>

Partnership		<p>include housing. A comment to make clear in principle support for housing above some ground floor or first uses can be added (albeit that conversion of some spaces above A1/A2 uses to a flat is already permitted development).</p> <p>Applications for residential conversion will however need to be considered in terms of existing uses (e.g. are they music industry related) and whether there are any implications for heritage assets.</p> <p>Proposed modifications: Revision to text to address this comment</p>
<p>Site 16: St Giles Circus/30</p> <p>8 – Greater London Authority</p>	<p>The document now makes reference to the design proposals by Gillespie which is supported. With regards to buses, TfL would want to retain as much flexibility for bus movements as possible as part of the TCR two-way scheme, and as part of the LUL/Crossrail works and beyond. As such, under the broad proposals for St Giles Circus section the removal of any bus infrastructure in this location will be opposed by TfL.</p> <p>The statement ‘How bus movements and termination points are managed is extremely important in supporting the envisaged objectives to improve and create spaces, streets and buildings that people can enjoy. Options to relocate bus stands and for managing servicing to existing and new buildings need to be fully explored to realise the full potential of improvements to the area,’ should be removed from the document or amended.</p> <p>Bus stands are vital pieces of transport infrastructure, and removing bus stands is not something TfL would be willing to do at Tottenham Court Road. This document should refer to protecting bus infrastructure to maintain good interchange rather than talk about removing or moving it. There are some plans to relocate some bus stands on to Earnshaw Street because of the closure of Andrew Borde Street but that should be the only reference to moving bus infrastructure in this location.</p> <p><i>TfL would recommend that the last bullet point is amended to read ‘retention of necessary bus infrastructure to support the bus network’. It is also recommended that another bullet point is added stating that there ‘should be maximum flexibility within designs for the road</i></p>	<p>It is recognised that bus infrastructure is and will be important for transport interchange in the area. Joint working on the urban realm proposals is ongoing and the wording doesn’t advocate removal of bus infrastructure, but to consider relocation options within the wider proposals.</p> <p>Proposed modifications: Revision to text to be put forward to clarify importance of bus infrastructure</p>

	<i>network to protect good interchange at Tottenham Court Road.'</i>	
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Site 17: 6-17 Tottenham Court Road(p.76)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 17: 6-17 Tottenham Court Road/9 4 – Charlotte Street Association	<p>1. Land Use. Para 1 implies that the development would be required to include all the four uses listed. It is very unlikely that this could be achieved within an acceptable build form.</p> <p>2. Design. Should specifically say that continued servicing from TCR is acceptable.</p> <p><i>Suggested re-wording –</i></p> <p><i>'Development is expected to provide a mix of uses including retail uses on the Tottenham Court Road frontage. Any increase in non-residential floor space should be matched by an equivalent area of residential including affordable.'</i></p>	The land use describes existing uses on the site and to the rear. This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance for this site which has undergone separate consultation. No change proposed.

Site 18: 21-31 New Oxford Street, Royal Mail Sorting(p.81)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 18: 21-31 New Oxford Street, Royal Mail Sorting/51 28 – Aviva	<p>In agreement with the Council's view that the site needs to be brought back into use and the benefits that might flow for the improvement of the immediate and wider area.</p> <p>The ability to introduce a wider mix of uses, including residential, is constrained by the form of the existing building and the impact additional cores have on the use and amount of floor space in the adjoining areas. A new build scheme providing a similar level of floor space could be better suited to including a residential component but would need to involve one or more taller buildings but there are a series of further constraints which become relevant when increasing building height on the site.</p> <p><i>In the light of the above there are two particular issues which we believe the site allocation should recognise:-</i></p> <p>1. <i>Whilst the Council will encourage a mix of uses on site, if it can be demonstrated that this approach is not practical or viable, the Council will seek provision on other suitable sites in the area. We suggest the first bullet point in the Site allocation guidance is amended along these lines.</i></p>	<p>Any housing requirements under mixed use policies should normally be met on site. Adopted policy DP1 allows for off-site solutions to be considered in exceptional circumstances, subject to justification in the light of specific proposals. No change proposed.</p> <p>If the building is retained then it is recognised that public realm opportunities may be more limited.</p> <p>Proposed modifications: A revision to text is proposed to address the second comment</p>

	<p>2. <i>Whilst it may be possible to improve pedestrian routes through the site and enliven the street frontages, the retention of large parts of the building envelope is likely to preclude the enlarging of the public realm. Therefore suggest that the third bullet point maintains the aspiration to improve the public realm, but deletes the phase “and enlarging”.</i></p> <p><i>We trust that the above is helpful and the comments will be considered and addressed in the further development of the document.</i></p>	
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Site 19: Land Bound by New Oxford Street, Museum Street and West Central Street(p.81)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 19: Land Bound by New Oxford Street, Museum Street and West Central Street/120 3 - English Heritage	Main Policy Considerations We would suggest that the heritage interests of the buildings that define the block are carefully assessed as part of the development of this site. This includes the listed building and any other buildings that may contribute to the character and appearance of the Bloomsbury conservation area designation. At present the details do not identify explicitly other buildings that should be regenerated sensitively due to their contribution to the significance of the conservation area.	Proposed modifications: Revision to text to address these comments

Site 20: 12-42 Southampton Row & 1-4 Red Lion Square(p.85)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/52 29 – Ashton Foundation and Dancers’ Career Development	Writes in support of keeping the Cochrane Theatre as a performing venue and object to the possibility of its demolition and write in support of its future.	Policy DP15 of the development plan provides an explicit aim to resist the loss of premises for continued theatre use. The guidance does not support demolition of the theatre, however this theatre was originally built
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/53	Great concern, along with that of many theatre and arts colleagues, about proposals for the demolition of the Cochrane Theatre by the site owners. Such action would inevitably affect severely cultural work in this great city. The Cochrane Theatre has helped to develop work of young performing artists as well as designers, choreographers and composers. This theatre has been able to nurture and present works by young people and	This allocation includes provision for retention or replacement of a theatre if justified. The plan does not include specific proposals and the future use/redevelopment of the site will be

<p>30 – David Rees</p>	<p>a platform also for ethnic creative talents across the spectrum of London society. We need the possibility and means to support artistic manifestations in the midst of a society that is increasingly commercialized and consumerised desiccating the soul. This is an opportunity for the London Voice to resist the Grange Hotel plans. After all London is the host of the Olympics this Summer and by allowing such vandalism as the demolition of the Cochrane Theatre we would not be honouring the ideals of the Olympians in Classical Greece.</p>	<p>subject to a future planning application.</p> <p>In terms of planning law, the degree of protection afforded to this particular theatre space essentially lies with whether it is ancillary to the previous education use and is therefore not, in legal terms, a separate planning unit and therefore an ancillary element of a wider D1/education use. Or whether it formed a separate planning unit from the outset or, over time through physical characteristics, uses and nature of operations it could be considered to have evolved as a separate planning unit(a sui generis theatre; defined as a leisure use in policy). These factors will dictate the relevant policies must be assessed that will influence decisions on applications on its future use.</p> <p>Policy DP15 of the adopted development plan specifically says the Council will resist the loss of premises that are suitable for continued theatre use and that it will protect those that are suitable for continued theatre use from being converted to another leisure use or any other use(para.15.9).The London Plan (Policy 4.6Ca) says in preparing plans boroughs should “enhance and protect creative work and performance spaces and related facilities”. CS10 also supports retention of leisure and cultural uses. Retention of theatres is obviously strongly supported by policy .</p> <p>This theatre appears to have been originally built for the Central School of</p>
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		<p>Art and Design to support its drama and performance functions. If it did continue to be largely ancillary to the higher education use (defined in the plan as a community use) before the colleges relocation and closure then it would constitute part of that overall community use. If so, the relevant parts of Policy DP15 would apply.</p> <p>In summary these seek to protect existing community facilities by resisting their loss unless a replacement facility that meets the needs of the local population is provided (primarily in terms of being accessible and in accessible locations) or it can be demonstrated the specific community facility is no longer required in its current use and that there is no demand for any other suitable community use on the site. It is noted that there is evident interest by a dance company in reusing the theatre.</p> <p>New facilities must also be provided in buildings which are flexible and sited to maximise the shared use of premises. Such assessments would have to be in terms of the primary educational and academic use of the new facilities.</p> <p>The University of the Arts(Central Saint Martins College) relocated to King Cross Central in 2011 to the listed former Granary building. It is considered that the new college is an important element of the mix of uses emerging in Kings Cross and a good example of</p>
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		<p>successful reuse and adaptation of an important listed building. Part of its facilities includes a small theatre/performance space: The Platform Theatre. As a university including drama and performance art as part of its areas of specialism it would have been surprising if such a facility had not been an essential part of its new facilities. Whilst it currently appears to be primarily focused on supporting its academic functions, there is some limited evidence of some public use.</p> <p>If however it were to be established that the theatre does constitute a separate planning unit (and therefore a sui generis theatre use) it would be afforded significant protection through development plan policies; retention or at the very least equivalent re-provision on site would generally be sought, regardless of demonstrating compliance with policy in terms of replacing the separate community use on the site.</p> <p>This highlights that any future application for this site needs to be supported with evidence either to demonstrate an ancillary use and sufficient justification to show how the community facility has been adequately replaced (and as such a requirement to replace or retain an ancillary theatre would fall away) , or include retention or appropriate replacement in accordance with policy(or justification for an alternative).</p>
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		<p>In the light of the above and the representations it is considered that the current wording does not provide the necessary clarity regarding relevant policies and that modification would assist in this.</p> <p>Proposed modifications: Revision to text to clarify policy</p>
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/54</p> <p>31 – Globalgrange Limited</p>	<p>The site allocation document notes that the University of the Arts relocated to the new campus at Kings Cross in 2011. The text of the guidance however is drafted in the future tense. Since the evidence is available to the Council, the text in SAD site 20 should be re-drafted to confirm that development can proceed under the provision of DP15c, without the need for either a theatre or other community uses to be re-provided on site or elsewhere.</p> <p>Changes Summary:</p> <p>SAD site 20 should be re-drafted to confirm that development can proceed under the provision of DP15c as the University of the Arts has relocated to Kings Cross. As the evidence is available for the Council to establish whether the University’s relocation satisfies the provisions of DP15c the guidance contained in SAD site 20 should clarify that there is no need for the re-provision of the theatre or other community uses to allow the development of the site to proceed.</p> <p>The text has to be redrafted to confirm that the University of the Arts has relocated, that the community facilities including the theatre have been re-provided satisfactorily and that there is no requirement on redevelopment to make provision for a theatre or other community uses as these have been re-provided as required under DP15c.</p> <p>Amend the following sentence to read.</p> <p><i>“As the theatre has been re-provided as part of the University’s relocation programme there is no requirement to retain or re-provide the theatre on the redevelopment of the site”</i></p> <p>Reason for Proposed Change Objection</p> <p>The Council approved the development now occupied by the University of the Arts and had the evidence to demonstrate that it has been re-provided.</p>	<p>The plan does not include specific proposals and the future use/redevelopment of the site will be subject to a future planning application.</p> <p>In terms of planning law, the degree of protection afforded to this particular theatre space essentially lies with whether it is ancillary to the previous education use and is therefore not, in legal terms, a separate planning unit and therefore an ancillary element of a wider D1/education use. Or whether it formed a separate planning unit from the outset or, over time through physical characteristics, uses and nature of operations it could be considered to have evolved as a separate planning unit(a sui generis theatre; defined as a leisure use in policy). These factors will dictate the relevant policies must be assessed that will influence decisions on applications on its future use.</p> <p>Policy DP15 of the adopted development plan specifically says the Council will resist the loss of premises that are suitable for continued theatre use and that it will protect those that are suitable for continued theatre use from</p>

	<p>Proposed Change Objection (please see attached track change document) – Main Policy Considerations. 1st Paragraph Page 86.</p> <p>Amend the following sentence:</p> <p><i>This could include the provision of new permanent housing (Policy CS6), along with retail commercial or office floorspace (DP1).</i></p> <p>Reason for Proposed Change Objection</p> <p>New permanent housing is required under policy DP1 where there is a net increase in floorspace. Therefore there could be a proportion of permanent housing as part of the development.</p> <p>Proposed Change Objection (please see attached track change document) – Main Policy Considerations – Page 86</p> <p>Delete and redraft the paragraph to read:</p> <p><i>The University of the Arts has relocated its facilities within the Kings Cross development. As the new facilities satisfy the provisions of policy DP15c, a mixed use development suitable to a central London location including office, hotel or other commercial uses, and a contribution to the supply of self contained housing under policy DP1 where there is a relevant increase in gross floorspace on redevelopment. The ancillary theatre on site does not need to be replaced on site as it has been replaced under the University’s relocation process.</i></p> <p>Reason for Change:</p> <p>To reflect policy and the relocation of the University of the Arts to Kings Cross in 2011.</p> <p>Proposed Change (please see attached track change document) further information</p> <p>Delete reference to the requirement for alternative D1 community use the sentence to read:</p> <p><i>The listed building on Southampton Row will need to be retained and sensitively put to alternative appropriate uses and any development of the remainder of the site should ensure that its fabric and setting are not harmed.</i></p>	<p>being converted to another leisure use or any other use(para.15.9).The London Plan (Policy 4.6Ca) says in preparing plans boroughs should “enhance and protect creative work and performance spaces and related facilities”. CS10 also supports retention of leisure and cultural uses.Retention of theatres is obviously strongly supported by policy .</p> <p>This theatre appears to have been originally built for the Central School of Art and Design to support its drama and performance functions. If it did continue to be largely ancillary to the higher education use (defined in the plan as a community use) before the colleges relocation and closure then it would constitute part of that overall community use. If so, the relevant parts of Policy DP15 would apply.</p> <p>In summary these seek to protect existing community facilities by resisting their loss unless a replacement facility that meets the needs of the local population is provided (primarily in terms of being accessible and in accessible locations) or it can be demonstrated the specific community facility is no longer required in its current use and that there is no demand for any other suitable community use on the site. It is noted that there is evident interest by a dance company in reusing the theatre.</p> <p>New facilities must also be provided in buildings which are flexible and sited to</p>
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	<p>Reason for Change:</p> <p>There is no policy presumption which requires the provision of alternative D1 use.</p> <p>Proposed Change (please see attached track change document) Further Information second paragraph:</p> <p><i>Delete the word maximised in the penultimate sentence and replace with the word provided. Sentence to read:</i></p> <p><i>Opportunities to improve the public realm and surrounding streets as well as way-finding and pedestrian connectivity (including Red Lion Square) and permeability through the site should be <u>provided</u>.</i></p>	<p>maximise the shared use of premises. Such assessments would have to be in terms of the primary educational and academic use of the new facilities.</p> <p>The University of the Arts(Central Saint Martins College) relocated to King Cross Central in 2011 to the listed former Granary building. It is considered that the new college is an important element of the mix of uses emerging in Kings Cross and a good example of successful reuse and adaptation of an important listed building. Part of its facilities includes a small theatre/performance space: The Platform Theatre. As a university including drama and performance art as part of it's areas of specialism it would have been surprising if such a facility had not been an essential part of its new facilities. Whilst it currently appears to be primarily focused on supporting it's academic functions, there is some limited evidence of some public use.</p> <p>If however it were to be established that the theatre does constitute a separate planning unit (and therefore a sui generis theatre use) it would be afforded significant protection through development plan policies; retention or at the very least equivalent reprovision on site would generally be sought, regardless of demonstrating compliance with policy in terms of replacing the separate community use on the site.</p> <p>This highlights that any future</p>
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		<p>application for this site needs to be supported with evidence either to demonstrate an ancillary use and sufficient justification to show how the community facility has been adequately replaced (and as such a requirement to replace or retain an ancillary theatre would fall away) , or include retention or appropriate replacement in accordance with policy(or justification for an alternative).</p> <p>If it is demonstrated that community use has been satisfactorily replaced then policies supporting other appropriate Central London uses will be applicable.</p> <p>In the light of the above and the representations it is considered that the current wording does not provide the necessary clarity regarding the relevant policies and that modification would assist in this.</p> <p>These changes would also therefore address the other comment relating to community use and housing.</p> <p>Proposed modifications: Revision to text to clarify policy</p>
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/55</p> <p>31 – Globalgrange Limited</p>	<p>SAD Site 20 is not sound as it does not accord with the Core Strategy and Development Plan Policies referred to in seeking to justify the Council’s requirements.</p> <p>Reference is made to policy DP15 in the main policy section of SAD Site 20.</p> <p>“Education uses (D2) and theatre (ancillary/sui generis) uses are protected by policy DP15 – community and leisure uses but as the existing occupiers are vacating the site to occupy new facilities within Kings Cross central development and on the basis that it can be</p>	<p>See comments above</p>

demonstrated these facilities will be offering better quality provision than alternative uses will be acceptable with priority given to new housing, particularly affordable housing and community uses”.

“The loss of the theatre will only be accepted if an alternative and accessible replacement facility is provided on site or elsewhere in the area as part of the University’s relocation programme”.

Policy DP15c allows the site to be released from education use where that use is replaced. In this case the evidence is available to confirm that replacement facilities have been provided. *The SAD Site 20 guidance should be redrafted to confirm that there is no need to replace any facility on site and that the provisions of policy DP15c have been met.*

As matters stand there is no policy justification under DP15c to require a residential-led development. Nor is there a policy basis to “maximise” residential in the redevelopment of a class D1 site within the central London area of Camden, where the D1 use has been replaced.

The Council also refer to policy CS9 which seeks a mix of uses on site. This policy provides “to seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments”. The policy does not indicate how it will achieve this. Policy DP1 sets out how mixed use development will be controlled. As explained in policy CS6 “Details of our approach to treating housing as our priority land use are included in Camden Development Policies (DP1.)

Core Strategy Policy CS1 Para 1.4 states;

“Distribution of growth promotes the most efficient use to land and buildings in Camden. This includes encouraging a mix of uses in development and expecting the provision of a mix of uses in schemes in the most accessible parts of the borough. Policy DP1 helps to deliver this by setting out our detailed approach to mixed use development”.

Policy DP1 Para 1.6 states;

“Policy DP1 is a relevant consideration for all new build development and extensions involving a significant floorspace increase; No non-residential uses are excluded from the policy”

The policy does not distinguish the development of D1 use from any other non-residential

	<p>use. Therefore adopted policy does not provide the basis for seeking a residential-led development of SAD Site 20.</p> <p>Changes Summary:</p> <p><i>Delete reference to a residential-led development: there is no such guidance in DP15c nor is there any need established in the text of SAD Site20 to impose a residential led development as the preferred form of development. Policies CS9-DP1 have been judged by the Inspector as effective in meeting Camden’s housing needs and these policies do not distinguish the redevelopment of D1 uses from other non-residential uses.</i></p> <p>Proposed Change</p> <p>Amend the following sentence to read:</p> <p><i>Mixed use development suitable to a Central London location including offices hotel or other commercial uses and a contribution to the supply of self contained housing under policy DP1 where there is a relevant increase in gross floorspace on redevelopment.</i></p> <p><i>Development will be expected to:</i></p> <p>Provide new housing in accord with Policy DP1 where there is an increase in floorspace.</p> <p>Reason for Change – Objection</p> <p>There is no policy justification contained in DP15c or DP1 to require the provision of residential use except where there is an increase in net floorspace. There is no policy requirement to provide community uses, where the existing use has been replaced. Therefore reference has been deleted.</p>	
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/56</p> <p>31 – Globalgrange Limited</p>	<p>SAD Site 20 is not effective as the policy provisions it contains make it impossible for applicants or decision makers to establish whether a development accords with its provisions.</p> <p>Requiring residential to be “maximised” implies that only where residential uses cannot be provided will the other uses expected in central London under policies CS9 – DP1 be acceptable. The tension between promoting mixed use while requiring residential to be maximised will not be effective as neither applicants or decision makers will be able to judge at what point residential is maximised or where other uses will be seen as</p>	<p>See above comments. Also it is considered that amending “maximised” to provided” is acceptable.</p> <p>Proposed modifications: Revision to text as above and amend “maximised” to provided” is acceptable.</p>

compatible with residential use. In this way guidance not only is not in accord with the Core Strategy and Development Management policies, it does not provide the clarity sought in good practice.

Changes Summary:

3. Remove references to “maximising” residential use as it is not supported by policy and the terminology does not give guidance on how an acceptable balance of uses can be struck. Require residential floorspace where policy DP1’s provision would apply.

Proposed Change (please see attached track change document) – Objection

Delete reference to ‘maximising the potential of the site to provide new housing (including affordable housing)’ replace with

Development will be expected to:

“Provide new housing in accord with policy DP1 where there is an increase in floorspace.”

The text has to be redrafted to confirm that the University of the Arts has relocated, that the community facilities including the theatre have been re-provided satisfactorily and that there is no requirement on redevelopment to make provision for a theatre or other community uses as these have been re-provided as required under DP15c

Proposed Change

Amend the following sentence to read.

“As the theatre has been re-provided as part of the University’s relocation programme there is no requirement to retain or re-provide the theatre on the redevelopment of the site”

Reason for Proposed Change

The Council approved the development now occupied by the University of the Arts and had the evidence to demonstrate that it has been re-provided.

Proposed Change

Amend the following sentence:

This could include the provision of new permanent housing (Policy CS6), along with retail commercial or office floorspace (DP1).

Reason for Proposed Change

New permanent housing is required under policy DP1 where there is a net increase in floorspace. Therefore there could be a proportion of permanent housing as part of the development.

Proposed Change

Delete and redraft the paragraph to read:

The University of the Arts has relocated its facilities within the Kings Cross development. As the new facilities satisfy the provisions of policy DP15 c, a mixed use development suitable to a central London location including office, hotel or other commercial uses, and a contribution to the supply of self contained housing under policy DP1 where there is a relevant increase in gross floorspace on redevelopment. The ancillary theatre on site does not need to be replaced on site as it has been replaced under the University's relocation process.

Reason for Change:

To reflect policy and the relocation of the University of the Arts to Kings Cross in 2011.

Proposed Change (please see attached track change document) further information

Delete reference to the requirement for alternative D1 community use the sentence to read:

The listed building on Southampton Row will need to be retained and sensitively put to alternative appropriate uses and any development of the remainder of the site should ensure that its fabric and setting are not harmed.

Reason for Change:

There is no policy presumption which requires the provision of alternative D1 use.

Proposed Change

	<p><i>Delete the word maximised in the penultimate sentence and replace with the word provided. Sentence to read:</i></p> <p><i>Opportunities to improve the public realm and surrounding streets as well as way-finding and pedestrian connectivity (including Red Lion Square) and permeability through the site should be provided.</i></p>	
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/57</p> <p>32 – Gordon Maclean</p>	<p>The Cochrane Theatre has been identified as an ideal location for development as a specialist dance and drama centre, and has made an offer to purchase it to the present owners. The theatre is part of the larger site (Site 20), formerly part of the University of Westminster, who are successors to the Polytechnic of Central London and the Central School of Arts and Crafts.</p> <p>Built originally as a teaching facility for the Central School it was used, over the period of 30 years until the site was sold last year, for commercial productions of a wide variety, and it became part of the West End theatre scene. Its use, especially for experimental productions, was widely known.</p> <p>The Cochrane Theatre has played a distinctive specialist role in West End Theatre for many years, and its initial function as a teaching resource, though not extinguished, had a diminishing position in its theatrical life. The theatre's traditional design, with proscenium stage and orchestra pit, whilst not innovative, is what most of the theatre industry needs, for productions that pay. This is especially so with dance and ballet productions.</p> <p>London and London Borough of Camden in particular, cannot afford to lose the Cochrane Theatre.</p> <p>Future Use: Very definite and specific interest has been registered by Peter Schaufuss Ballet, the National Dance Company of Denmark, in acquiring the Cochrane Theatre, and developing it as a specialist ballet/dance/musical/drama theatre The Cochrane's traditional layout planning is particularly suited to this type of production, and its location, size and plan arrangements make it ideal for this purpose. Feasibility shows that the site could be re-developed on a practical and economic basis as a hotel with a minimum of 425 hotel bedrooms (excluding that part of the site occupied by the listed Lethaby building), whilst retaining the theatre.</p> <p>The Cochrane Theatre can be economically integrated into a re-development of the site for hotel (or other) use without compromising its feasibility. This would be so whether the</p>	<p>This allocation includes provision for retention or replacement of a theatre if justified. The plan does not include specific proposals and the future use/redevelopment of the site will be subject to a future planning application.</p> <p>In terms of planning law, the degree of protection afforded to this particular theatre space essentially lies with whether it is ancillary to the previous education use and is therefore not, in legal terms, a separate planning unit and therefore an ancillary element of a wider D1/education use. Or whether it formed a separate planning unit from the outset or, over time through physical characteristics, uses and nature of operations it could be considered to have evolved as a separate planning unit(a sui generis theatre; defined as a leisure use in policy). These factors will dictate the relevant policies must be assessed that will influence decisions on applications on its future use.</p> <p>Policy DP15 of the adopted development plan specifically says the Council will resist the loss of premises that are suitable for continued theatre use and that it will protect those that are</p>

	<p>theatre interest was acquired by any other theatre company, not just by the Peter Schaufuss Ballet.</p> <p>The Guidance says: “...retain or satisfactorily reprovide a theatre elsewhere in the borough, which may be incorporated as part of the University’s relocation programme.” It is suggested that this linkage of re-provision to the University’s relocation is unnecessarily restrictive (notwithstanding the word “may”.)</p> <p><i>It is suggested that this is re-worded: “...retain the Cochrane Theatre on site”</i></p> <p><i>Alternatively, that this be added: “...or reprovide a theatre of the same size and capacity, and with the same or improved features, elsewhere in West End Theatreland”.</i></p> <p>This rewording would reflect accurately the actual predominant use and status of the Cochrane Theatre in the period up to its closure, which was not as an exclusively University teaching resource. The University has built new theatre space within its new campus at Kings Cross, but this is not an acceptable substitute for the Cochrane Theatre. It is not planned with proscenium arch, orchestra pit, or fly tower. Its predominant function is, correctly, to support the University’s drama teaching work. It cannot be properly described as a public theatre, although no doubt the public will not be excluded. Above all it could not perform the functions of a West End commercial theatre.</p>	<p>suitable for continued theatre use from being converted to another leisure use or any other use(para.15.9).The London Plan (Policy 4.6Ca) says in preparing plans boroughs should “enhance and protect creative work and performance spaces and related facilities”. CS10 also supports retention of leisure and cultural uses. Retention of theatres is obviously strongly supported by policy .</p> <p>This theatre appears to have been originally built for the Central School of Art and Design to support its drama and performance functions. If it did continue to be largely ancillary to the higher education use (defined in the plan as a community use) before the colleges relocation and closure then it would constitute part of that overall community use. If so, the relevant parts of Policy DP15 would apply.</p> <p>In summary these seek to protect existing community facilities by resisting their loss unless a replacement facility that meets the needs of the local population is provided (primarily in terms of being accessible and in accessible locations) or it can be demonstrated the specific community facility is no longer required in its current use and that there is no demand for any other suitable community use on the site. It is noted that there is evident interest by a dance company in reusing the theatre.</p> <p>New facilities must also be provided in</p>
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		<p>buildings which are flexible and sited to maximise the shared use of premises. Such assessments would have to be in terms of the primary educational and academic use of the new facilities.</p> <p>The University of the Arts(Central Saint Martins College) relocated to King Cross Central in 2011 to the listed former Granary building. It is considered that the new college is an important element of the mix of uses emerging in Kings Cross and a good example of successful reuse and adaptation of an important listed building. Part of its facilities includes a small theatre/performance space: The Platform Theatre. As a university including drama and performance art as part of it's areas of specialism it would have been surprising if such a facility had not been an essential part of its new facilities. Whilst it currently appears to be primarily focused on supporting it's academic functions, there is some limited evidence of some public use.</p> <p>If however it were to be established that the theatre does constitute a separate planning unit (and therefore a sui generis theatre use) it would be afforded significant protection through development plan policies; retention or at the very least equivalent reprovision on site would generally be sought, regardless of demonstrating compliance with policy in terms of replacing the separate community use on the site.</p>
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<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/58</p> <p>33 – Mike Dixon</p>	<p>Object to the proposal to demolish the Cochrane Theatre as part of the development of the above site. Whatever development takes place on this site should included the retention of this theatre, hopefully refurbished and upgraded, as a cultural beacon for future generations.</p>	<p>See earlier response</p>
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/59</p> <p>34 – Jeffery Taylor, Dance Critic and feature writer for The Sunday Express</p>	<p>As well as being part of the broader success story of the West End as a whole, the Cochrane Theatre, on its highly individual site, has become a part of London’s pride and community, welcoming through its extremely affordable doors artistic talent of every ethnic grouping. The Cochrane Theatre always associated with youth, invented diversity decades before it became a fashionable political concept.</p> <p>Peter Schaufuss was one of the greatest dancers the world has ever seen, with a huge following here after forging his career in this country. A Dane with long standing British nationality, Schaufuss has an extensive repertory for a small company which could provide the core of a popular and lively programme which would embrace all forms of dance and theatre. In particular the vigorous ethnic art forms of this creative community. In my opinion, Schaufuss could provide the affordable, yet creative entertainment with which the Cochrane Theatre has become so closely linked. I beg you to think carefully before you</p>	<p>See earlier response</p>

	destroy the life and soul of a precious theatrical commodity in a thriving and much loved part of London town.	
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/60 35 – The Rt Hon Lord Paul Boateng	Objection to any proposal which would include the demolition of the Cochrane Theatre and to support proposals that would retain live theatrical use on this site. I believe the remodelling of the theatre by Abiodun Odedina and its home to Talawa as constituting a significant cultural landmark in this diverse and multi social city.	See earlier response
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/61 37 – Michael Johnstone	Note with deep concern Camden’s plans to demolish the Cochrane Theatre and to grant planning permission for a hotel to be built on the site. As a supporter of the arts and a writer, I wish to register a protest against these plans. Camden Council has a proud tradition in supporting the Arts, and I would hope and trust that in refusing permission to demolish the Cochrane to make way for a hotel and in encouraging its on-going use as a Theatre, the present Council will continue this tradition.	See earlier response
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/62 38 – Mark Borkowski	Objection to the demolition of the Cochrane Theatre. The Cochrane Theatre has a unique history and physical place in theatre land. It is the last recognizable fringe theatre. London’s fringe has been decimated by funding cuts over the last 25 years and if we were to lose a space with excellent amenities for the performers and audience, it would be a tragic loss. In the passion to bulldoze fringe theatre, surely this venue with all its history should remain and not become a pile of rubble for a developers dream.	See earlier response
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/63 39 – Classical Events Ltd	We would like to raise concern regarding the plans for development of the site including the Cochrane Theatre and raise a strong objection to this building being demolished. This theatre is a valuable site as a venue for the performing arts – especially as the capacity of the house gives it the opportunity to be available for new work and creations which is quite difficult to find in the capital. As promoters of dance and other performing arts genres, we will be supporting the building as a theatre and performing arts space.	See earlier response
Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/64	I wish to register my objection to the proposed demolition of the Cochrane Theatre and support its future as a performing venue in London’s West End. To ensure the Theatre’s future, a formal financial offer has been made to the Grange Hotels, the present owner of the Cochrane Theatre. The Theatre is at this moment unnecessarily closed, locked up with chains and padlocks; it is a disgraceful sight for the local environment to say the least.	See earlier response

<p>40 – Peter Schaufuss Balletten ApS</p>	<p>I and my Company are able to take over the Theatre immediately and open it to the public for performances. Our Company would base itself in the Cochrane Theatre. We have the necessary knowledge, technical equipment, performance experience and finances to do this instantly. A feasibility study has been made and forwarded to the Grange Hotels and London Borough of Camden Planning Department which shows clearly that the Theatre can be maintained within a future development. A petition “Save The Cochrane Theatre” is now being prepared.</p>	
<p>Site 20: 12-42 Southampton Row & 1-4 Red Lion Square/65</p> <p>41 – The Theatres Trust</p>	<p>We note in the Site Allocation Guidance on page 86, and in the Main Policy Considerations, that there are options to either retain the Cochrane Theatre on this site or that theatre provision is relocated with the University’s new site in King’s Cross.</p> <p>The Trust is opposed to the current wording. We strongly suggest that any redevelopment of Site 20 should retain the existing Cochrane Theatre or incorporate an equivalent sized theatre as part of any new development scheme. The demand for this scale of theatre in central London is exemplified by other recent developments such as the nearly completed St James’s theatre in Victoria and the recently approved NIMAX theatre on the former Astoria site in Tottenham Court Road.</p> <p>The theatre was originally built for students at the college, but because of its central location, connections and programming, developed a much wider public audience. The retention of theatre use would reflect Policy DP15 as the new University facility on the King’s Cross site, the King’s Cross Platform Theatre (KCPT), does not provide equivalent theatrical provision. This is because the KCPT’s prime function is for student training, and although there are intentions to let it commercially, there is no guarantee that a professional company will take up residence and in any case this would only be during the student holiday period.</p> <p>Policy DP15 c) states that the Council will resist the loss of existing community facilities unless a replacement facility is provided that meets the needs of the local population. In our opinion, if the existing theatre is not retained, and no new theatre is provided, the needs of the local population will not be met. The Cochrane Theatre is unusual in that it was a receiving and producing house that presented all aspects of the performing arts. It is one of the few London theatres to have its own paint frame and substantial back-of-house facilities.</p> <p>Policy DP15 f) states that the Council will resist their loss unless the leisure facility is no longer required. The theatre does not need to be demolished because it is no longer required. It is simply that other uses will be more profitable on the site. Furthermore, we</p>	<p>See earlier response</p>

	<p>are aware of an interested party who would be willing to purchase and run the theatre.</p> <p><i>Changes required: in line with your existing plan policies, we therefore request that you change the first bullet point in the grey text box (page 86) to read 'Retain or satisfactorily provide a replacement theatre on the development site.' We would also request that you amend the last sentence (paragraph two) under 'Main Policy Considerations' by deleting the words 'or elsewhere in the area as part of the University's relocation programme.'</i></p>	
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Fitzrovia(p.91)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Fitzrovia and Bloomsbury/121 3 - English Heritage	<p>We would draw your attention to our letter of response (dated 3rd April 2012) to the working draft AAP for Fitzrovia, when considering the details of the sites identified. In particular the need for an overarching objective of providing a positive strategy for the conservation and enjoyment of the historic environment in Fitzrovia. This includes the need to conserve and enhance all heritage assets including the settings and to ensure any assets at risk are given priority. In addition it is important to ensure that opportunities for new development within conservation areas and the setting of heritage assets enhance or better reveal their significance.</p>	Comments noted
Fitzrovia/6 4 – Charlotte Street Association	<p>The rationale for including 4 sites covered by the Fitzrovia AAP in this document is not understood and is likely to be confusing; furthermore the description of Fitzrovia in the text contains numerous inaccuracies. Given the more detailed analysis in the AAP that is the more useful document.</p> <p>Attached are the comments submitted by CSA as part of our response to the draft AAP; they apply equally to the Site Allocation Document.</p> <p><i>It is suggested that these four sites and the Fitzrovia description be omitted from the Site Allocation Document and the appropriate reference made to the Fitzrovia AAP for guidance.</i></p>	<p>This plan highlights that other large sites will contribute to meeting Core Strategy objectives and this part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance and has undergone separate consultation. No change proposed</p>

Site 22: Middlesex Hospital Annexe, Cleveland Street (former Work House)(p.93)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 22: Middlesex Hospital Annexe, Cleveland Street	<p>Main Policy Considerations</p> <p>In order to provide clarity about the importance of the buildings and spaces on the site, we</p>	<p>This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which</p>

<p>(former Work House)/122</p> <p>3 - English Heritage</p>	<p>would advise that the elements that provide a positive contribution to the character of Charlotte Street Conservation Area should be identified. At present the current wording is not clear on what elements of the existing site should be preserved.</p>	<p>contains more detailed policies and guidance. No change proposed</p>
<p>Site 22: Middlesex Hospital Annexe, Cleveland Street (former Work House)/47</p> <p>24 – Howard House & Cleveland St (north Neighbourhood Watch)</p>	<p>The affordable housing identification component stems from the development of the Middlesex Hospital with Kaupthing/Candy & Candy brothers was time conditioned and is deemed to have lapsed (s106 agreement, dated 1 July 2004). It is incorrect for Camden Council to be advertising this agreement as live and active and misrepresents the current state of the conditions upon the site and the legal constraints which underpin options. Camden Council may like to have an affordable housing agreement in place but that is something else and requires a separate statement.</p> <p>The site ought to be treated as a complex of buildings. The buildings come within the Charlotte St Conservation Area and are subject to Conservation Area protection.</p> <p>The context is misleading as the site is in keeping with the Charlotte St Conservation Area scale and with the FAAP Charlotte St Character Area.</p> <p>This Watch initiated and directly proposed the opportunities of coordinating the developments of Windeyer, Astor, Saatchi (80 Charlotte St), Tottenham Mews Clinic and Arthur Stanley House for the, centred on Bedford Passage.</p>	<p>The affordable housing on this site relates to another s106 agreement to the one that is referred to and the obligations are still extant.</p> <p>The description highlights the listing and the need for particular sensitivity and highlights potential for links in conjunction with other developments.</p> <p>This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance which has undergone separate consultation and this plan does not propose to include specific guidance.</p> <p>Proposed modification: amendment to wording in context</p>
<p>Site 22: Middlesex Hospital Annexe, Cleveland Street (former Work House)/4</p> <p>4 – Charlotte Street Association</p>	<p>Land Use. In relation to the affordable housing required by both S106 agreements all the 45 units (30 plus 1426 sqm) are required to be social renters. The text should be amended to reflect this.</p> <p>Public Open Space. Note comments under master plan above. The earlier scheme offered little POS. The main open space element provided was amenity space limited for use by residents. In the current pre-application discussion it should be made clear that that would not meet the requirements of the brief.</p>	<p>This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance. No change proposed.</p>
<p>Site 22: Middlesex Hospital Annexe, Cleveland Street (former Work House)/67</p>	<p>UCLH are content that the policy considerations for the site will be dealt with within the emerging Fitzrovia Area Action Plan UCLH object to the proposals to create new public open space on the site which is highly constrained in site area terms and due to the fact that the Middlesex Hospital Annex building is listed.</p> <p>The above wording should therefore be re-worded to read</p>	<p>The wording relating to new space/routes is not intended to apply to this site in isolation—it should read in context of potential development of other sites e.g. Tottenham Mews (CANDI), Astor College and Arthur</p>

<p>43 – University College London Hospitals NHS Foundation Trust (UCLH)</p>	<p><i>'redevelopment should look at options with other landowners for a more comprehensive approach including looking at improving existing health facilities and creating new public space and routes'</i></p>	<p>Stanley House as identified and explored in the Fitzrovia AAP.</p> <p>It suggests collaboration with other landowners to look at options (as it should be as part of any design analysis to support future planning applications on this or adjacent sites) and does not set down a requirement and that detailed guidance and requirements will be developed and established through the AAP. No change proposed</p>
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Site 23: Arthur Stanley House, 44-50 Tottenham Street(p.95)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 23: Arthur Stanley House, 44-50 Tottenham Street/5</p> <p>4 – Charlotte Street Association</p>	<p>1. Land Use. We believe the site is within a viewing corridor making any re-development of the site unlikely.</p> <p>2. Public Open Space. Any roof garden provided should make provision for public access.</p>	<p>This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance.</p>
<p>Site 23: Arthur Stanley House, 44-50 Tottenham Street/68</p> <p>43 – University College London Hospitals NHS Foundation Trust (UCLH)</p>	<p>UCLH are content that the policy considerations for the site will be dealt with within the emerging Fitzrovia Area Action Plan. In this context, UCLH anticipate that the site will be identified for medical or healthcare purposes or a mixed use scheme comprising uses suitable within the Central Area Zone such as offices and residential uses.</p> <p>UCLH object to the proposals to create new public space on the site which is highly constrained. The site has a limited footprint which is not capable of accommodating public space.</p> <p>The wording should therefore be re-worded to read</p> <p><i>'redevelopment should look at options with other landowners for a more comprehensive approach including looking at improving existing health facilities and creating new public space and routes'</i></p>	<p>The wording relating to new space/routes is not intended to apply to this site in isolation—it should read in context of potential development of other sites e.g. Tottenham Mews (CANDI), Astor College and Middlesex Annexe, Cleveland St as identified and explored in the Fitzrovia AAP.</p> <p>It suggests collaboration with other landowners to look at options (as it should be as part of any design analysis to support future planning applications on this or adjacent sites) and does not set down a requirement and that detailed guidance and requirements will</p>

		be developed and established though the AAP. No change proposed
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Site 24: Grafton Way, Odeon Cinema Site(p.97)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 24: Grafton Way, Odeon Cinema Site/7 4 – Charlotte Street Association	<p>1. Land Use. The requirement for an integrated building with the Odeon site should be explored – this should be a requirement.</p> <p>Any increase in non-residential floor space in the development should in accordance with policy be matched by an equivalent increase in residential floor space including affordable.</p> <p>2. Design. The close proximity of two important listed buildings (the Cruciform block and the Medical School) should be noted.</p> <p>3. Parking. Requirement in relation to parking as per Odeon site.</p>	This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance.
Site 24 Grafton Way, Odeon Cinema Site/8 4 – Charlotte Street Association	<p>1. Land Use. See comments above re integrated design.</p> <p>2. Design. Any development should not be higher than the existing buildings fronting Tottenham Court Road to the north and the south.</p> <p>3. Parking. The development should be required to more than contribute to the reduction of hospital related parking issues. These in the main relate to patient transport vehicles. The problem is after all wholly generated by the hospital.</p>	This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance.
Site 24: Grafton Way, Odeon Cinema Site/66 42 – Clive Narrainen	Considers document sound and legally compliant	Noted
Site 24: Grafton Way, Odeon Cinema Site/69 43 – University College London Hospitals NHS Foundation Trust	The site area identified for the Odeon Site is shown incorrectly in the Site Allocations DPD. The site area will also include the Rosenheim building which is an existing medical building comprising basement, ground and 6 upper floors. We enclose an OS Plan which shows the correct site area. <i>This should be incorporated within the revised version of this document and the ‘Site Context’ description should also be expanded to make reference to the Rosenheim building.</i> Whilst it is recognised that the Rosenheim building is mentioned, the inclusion of this building within the site allocation should be more specific as advised.	This part of the plan is intended to signpost interested parties to the Fitzrovia Area Action Plan which contains detailed policies and guidance and it refers to the Rosenheim building and this is considered sufficient.

(UCLH)	<p>UCLH are content that the policy considerations for the site will be dealt with within the emerging Fitzrovia Area Action Plan in accordance with previous stakeholder discussions which have taken place with LB Camden. In this context, UCLH anticipate that the site will be identified for medical or healthcare purposes.</p> <p>The above representations provide a presumption for the development of the Trust's Estate and flexibility to provide new medical, health, and research accommodation to support their future objectives, or for alternative development where land and buildings become surplus to requirements.</p>	
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Site 25: Senate House North Block(p.100)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 25: Senate House North Block/71 44 – University of London (UoL)	Confirm the University's support for the designation. On page 101 "UCL" should read "UoL". The second reference in relation to the CHP system is correct.	Support welcomed. Proposed modifications: amend "UCL" to "UoL"

Site 26: 27 Gordon Square and 15 Gordon Street(p.102)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 26: 27 Gordon Square and 15 Gordon Street/123 3 - English Heritage	Site Allocation – Suggested Approach <i>The need to respond to historic context should be drawn out more explicitly. We would therefore suggest that the fourth bullet point should state:</i> <u>Safeguard the setting of adjacent and nearby listed buildings and the character of the Bloomsbury Conservation Area.</u>	Proposed modifications: Include amendments to wording
Site 26: 27 Gordon Square and 15 Gordon Street/73 45 – University College London (UCL)	UCL strongly supports the allocation for new university facilities, to enhance the academic offer of the university. The entire site is required by UCL for a New Student Centre. It will be located within the main Bloomsbury campus and be funded entirely by UCL and its benefactors. Residential development would not be appropriate on this site and therefore UCL welcomes the omission of reference to the potential for residential uses in the supporting text.	Support welcomed. Proposed modifications: Include reference to safeguarding review in plan

	<p>UCL welcomes the omission from the previous site allocation description of “publically accessible learning and exhibition space”, in line with the current proposals for the site.</p> <p>The UCL Bloomsbury Masterplan sets out an estate wide strategy to increase public accessibility and create more active frontages. UCL supports the Council’s objective for the site to present active frontages to the street and create a coherent route through the UCL estate. These objectives are aligned with those of the UCL Masterplan.</p> <p>It is intended that a connection to UCL’s existing district heating network will be provided, subject to feasibility and network capacity, in line with the draft site allocation.</p> <p>The site lies within the current safeguarded area for Crossrail 2: Chelsea-Hackney, which came into force in September 2008. However, UCL is aware that the safeguarded route is currently being reviewed by TfL, in light of proposals for a new High Speed rail line between Birmingham and London Euston. Any changes to the safeguarding should be reflected on the Site Allocations document, where possible.</p>	
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Site 27: 20-22 Gordon Street(p.105)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 27: 20-22 Gordon Street/74 45 – University College London (UCL)	<p>UCL strongly supports the allocation for new university facilities, to enhance the academic offer of the university. UCL welcomes the omission of reference to residential as a secondary use within the supporting text. As with the New Student Centre, UCL requires the entire site for development to maintain the growth and attractiveness of the university; the primary education use would not be compatible with housing; and the entire development will be funded by UCL and its benefactors.</p> <p>UCL welcomes reference to the UCL Bloomsbury Masterplan, which acknowledges the need for improvement to and extension of existing buildings, to help improve the facilities and learning experience for UCL students. UCL supports the objective to create more publically accessible routes through the estate and the creation of active ground floor uses, in line with the Bloomsbury Masterplan.</p>	Support welcomed

Site 28: Phoenix Place(p.108)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 28: Phoenix Place/124	A key outcome of the redevelopment of the area is to sustain and enhance the historic environment. In this context we welcome the reference to the Bloomsbury and Hatton Garden conservation areas, and listed buildings.	Comment welcomed.

3 - English Heritage	<p>I write to confirm Islington Council's support for the manner in which officers from both Islington and Camden councils have engaged on cross-boundary issues during the development of Camden's Site Allocations DPD.</p> <p>As noted in the draft DPD, sites 28 and 29 fall within the wider Farringdon area. Islington is actively planning for growth in the neighbouring Farringdon/Smithfield Intensification Area, primarily through the Finsbury Local Plan (which is currently at Proposed Submission stage). As noted in the DPD, Islington and Camden Councils have also recently adopted a supplementary Planning Document to provide an additional level of guidance for the development of this important site. We consider that this document is reflective of the proposed site allocation for Phoenix Place and the corresponding site allocation for the main Mount Pleasant site contained in Islington's Finsbury Local Plan. This emerging policy framework will ensure that this important site is redeveloped in a manner which addresses the priorities identified in our boroughs' LDFs, as well as the London Plan.</p> <p>The DPD contains five proposed site allocations that are close to the Islington boundary.</p> <p>As you are aware, Islington Council is developing plans which aim to complement the objectives and policies of Camden's Core Strategy, Development Policies and Site Allocations. It is considered that Islington's adopted Core Strategy and its emerging policies, designations and allocations will provide a positive basis for managing change along our shared boundary in a manner consistent with the London Plan 2011.</p>	Support welcomed.
<p>Site 28: Phoenix Place/76</p> <p>47 – Royal Mail Group Limited (RMG2)</p>	<p>RMG has a number of holdings throughout the Borough, including the Mount Pleasant Mail Centre on Farringdon Road. The eastern part of this property lies within LB Islington, however the western part of the site (known as Phoenix Place) is located within LB Camden and is identified as site 28 within the draft DPD.</p> <p>We can confirm that RMG generally supports the designation of the site within the DPD for a mixed use primarily residential development, which accords with the key principles of the adopted Mount Pleasant SPD (February 2012).</p>	Support welcomed.
<p>Site 28: Phoenix Place/77</p> <p>48 – Martina Geccelli</p>	<p>I would propose mixed use for living accommodation and /or housing. A secondary school is also something which is missing in this area. Mount pleasant should be filled with an Inner-city living of retail, social enterprises (schools / nurseries/) plus working spaces.</p>	<p>Mixed use is a key principle and new housing is supported through this allocation. The plan identifies Site 30 at Wren Street as a potential location for a secondary school subject to future review of pupil projections and capacity. No</p>

		change proposed
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Site 29: Herbal House, 10 Back Hill(p.111)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 29: Herbal House, 10 Back Hill/125 3 - English Heritage	<p>We welcome the reference to English Heritage’s view on the merits of this building and its contribution to the special character and appearance of the conservation area. However we would suggest that these views are not restricted to the Further Information section, but translated into the Site allocation Guidance. We would strongly suggest that the current words of maximising the potential of the site should be <i>amended to <u>optimise</u> and that an additional point is included which highlights the need for the building to be retained, so that its positive contribution to the conservation area continues.</i></p>	<p>Proposed modifications: to insert optimise and emphasise presumption in favour of retention.</p>
Site 29: Herbal House, 10 Back Hill/108 10 – Islington Council	<p>I write to confirm Islington Council’s support for the manner in which officers from both Islington and Camden councils have engaged on cross-boundary issues during the development of Camden’s Site Allocations DPD.</p> <p>As noted in the draft DPD, sites 28 and 29 fall within the wider Farringdon area. Islington is actively planning for growth in the neighbouring Farringdon/Smithfield Intensification Area, primarily through the Finsbury Local Plan (which is currently at Proposed Submission stage). As noted in the DPD, Islington and Camden Councils have also recently adopted a supplementary Planning Document to provide an additional level of guidance for the development of this important site. We consider that this document is reflective of the proposed site allocation for Phoenix Place and the corresponding site allocation for the main Mount Pleasant site contained in Islington’s Finsbury Local Plan. This emerging policy framework will ensure that this important site is redeveloped in a manner which addresses the priorities identified in our boroughs’ LDFs, as well as the London Plan.</p> <p>The DPD contains five proposed site allocations that are close to the Islington boundary.</p> <p>As you are aware, Islington Council is developing plans which aim to complement the objectives and policies of Camden’s Core Strategy, Development Policies and Site Allocations. It is considered that Islington’s adopted Core Strategy and its emerging policies, designations and allocations will provide a positive basis for managing change along our shared boundary in a manner consistent with the London Plan 2011.</p>	<p>Support welcomed</p>
Site 29: Herbal House, 10 Back Hill/78	<p>I believe a mixed use of this same building would be the best solution. Opposed strongly to the demolition of this valuable brick- steel former warehouse building., Even though the time of industrial production has passed the buildings themselves create with their open and flexible structure a huge opportunity for a typical inner-city occupancy – be it loft-living</p>	<p>Comments welcomed. Retention of the building is emphasised in the guidance and an appropriate mix of uses is also supported including residential and flexible</p>

<p>48 – Martina Geccelli</p>	<p>or smaller studio spaces. Clerkenwell is market as a creative hub with many different creative industries. Would appreciate the conversion, if necessary into smaller workshops or studios reinforcing the creative hub idea for Clerkenwell. I am sure that a mixed use with integrated living spaces / flats is a sensible inner-city opportunity. Strongly opposed to the demolition of the building as an important building for the close neighbourhood with its light industrial looks. Creating living spaces for the (young) creative workers as much as key-workers is an important and welcome aspect.</p> <p>Ray Street, Backhill and Herbal Hill are spatially quite narrow and filling this site with high density living accommodation might create a too close and too tightly packed street. Hotel use is less appropriate as access is only from small neighbourhood streets with residential aspect. The noise produced from delivery and servicing a hotel would be a problem for residents. Strongly oppose even more student accommodation as the neighbourhood filled during recent years with plenty of student housing(Crawford passage/ bakers Row/ Herbal Hill/ Farringdon Road) The details of refurbishment should consider when extending the building that we on Ray Street have this side as our south side with very sunny aspects. Rising the building – adding other levels- need to consider that aspect.</p>	<p>workspace. The guidance emphasises that uses should not only be compatible with each other, but with neighbouring residential uses and proposals would need to demonstrate that the amenity of residents would not be detrimentally affected. No change proposed.</p>
<p>Site 29: Herbal House, 10 Back Hill/79</p> <p>49 – Herbal House Investments Limited</p>	<p>SAD Site 29 is not sound as it does not accord with the Core Strategy and Development Plan Policies referred to in justifying the Council’s requirements. The requirement for a residential-led regeneration of Site 29 is not supported by policy or by any evidence adduced in the site allocation document.</p> <p><i>Proposed Change: If no longer retained for education/community use, then conversion <u>or extension of the existing building or the construction of a new building or buildings for a mix of uses appropriate to a Central London context such as self-contained (C3) residential, studios, hotel, offices.</u></i></p> <p>Development should provide new housing in accord with policy DP1 where there is an increase in floorspace.</p> <p><u>Main Policy Considerations (Page 112 Site 29)</u></p> <p><i>“Subject to justification that the site is no longer needed for educational purposes (to accord with Policy DP15), residential-led mixed use redevelopment would be preferred. Any development involving a relevant increase in floorspace, should include a proportion of new housing consistent with the mixed use policy (Policy DP1).”</i></p>	<p>Agree that greater clarity could be provided in respect of acceptable uses in accordance with policies and that whist housing is a preferred use in the development plan the application of DP15 and other policies of the plan would support alternative uses-subject to relevant criteria in those policies.</p> <p>There is strong policy presumption against demolition and it is considered that this should remain emphasised and that acceptable uses should be included in that context. The principle of demolition and the resultant proposed uses would most appropriately be justified and assessed analysed at the planning application level.</p> <p>Proposed modifications: amend “should</p>

	<p>The (highlighted) paragraph above should be deleted as there is no policy requirement seeking a residential led development where a D1 use is being replaced under Policy DP15.</p> <p>Further Information <i>penultimate paragraph page 112 site 29</i></p> <p><i>“A mixed use development should (could) include residential, but could also include offices, hotel and studio type workspaces, all of which would be compatible with the mix in the surrounding area. Care should be taken to ensure that the mix of uses within the building are compatible. The building is relatively large and prominent within the adjoining streets, but is lower than some buildings in the wider context. There may be opportunities for extension above the existing roof level, although such additions would need to take account of their visibility in short and long views and respect the original form of the building.”</i></p> <p>Reason: There is no policy support requiring residential unless it is specified in Policy such as DP1 or DP15(d). <i>The word “should” (highlighted) be deleted and replaced with the word could.</i></p>	<p>“ to “could” and reword policy considerations, guidance box and information to more appropriately reflect relevant and applicable policies</p>
<p>Site 29: Herbal House, 10 Back Hill/80</p> <p>49 – Herbal House Investments Limited</p>	<p>SAD Site 29 is not effective as the policy provisions it contains make it impossible for applicants or decision makers to establish whether a development accords with its provisions.</p> <p>There is no justification to require development to maximise the potential of the site to provide new housing as explained.</p> <p>Requiring residential to be maximised implies that only where residential uses cannot be provided will the other uses expected in central London Policies CS9 – DP1 be acceptable. The tension between promoting mixed use while requiring residential to be maximised will not be effective as neither applicants or decision makers will be able to judge at what point residential is maximised or where other uses will be seen as compatible with residential use.</p> <p><i>Remove references to “maximising” residential use as it is not supported by policy and the terminology does not give guidance on how an acceptable balance of uses can be struck.</i></p> <p>Proposed Change – Objection (see attached track changed document).</p>	<p>As above it is agreed that greater clarity could be provided in respect of acceptable uses in accordance with relevant policies and that whist housing is a preferred use in the development plan the application of other policies of the plan would support alternative uses -subject to relevant criteria.</p> <p>Proposed modifications: reword policy considerations, guidance box and information to more appropriately reflect relevant and applicable policies</p>

	<p>Delete reference to maximising the potential of the site to provide new housing (including affordable housing) replace with</p> <p><i>Development will be expected to:</i></p> <p><u><i>Provide new housing in accord with policy DP1.</i></u></p>	
<p>Site 29: Herbal House, 10 Back Hill/81</p> <p>49 – Herbal House Investments Limited</p>	<p>The policy should be drafted to control land use regardless of whether the existing building is retained or is altered, extended or replaced. The use of the retention of the building should not be prejudged in the Site Allocation Document. It is sufficient to note as the guidance does that English Heritage consider that the building makes a positive contribution to the Conservation Area.</p> <p>Require residential floorspace where policy DP1’s provision would apply.</p> <p>Add reference redevelopment alteration or extension as well as conversion of the existing building.</p> <p><u>Site Allocation Guidance (page 111)</u></p> <p>Proposed Change</p> <p><i>If no longer retained for education/community use, then conversion <u>or extension</u> of the existing building <u>or the construction of a new building or buildings</u> for a mix of uses <u>appropriate to a Central London context such as self-contained (C3) residential, studios, hotel, offices.</u></i></p>	<p>There is strong policy presumption against demolition and it is considered that this should remain emphasised and that acceptable uses should be included in that context. The principle of demolition and the resultant proposed uses would most appropriately be justified and assessed analysed at the planning application level.</p> <p>The guidance indicates that well-designed extension may be possible.</p>

Site 30: Pakenham Street, Cubitt Street, Langton Walk (p.114)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 30: Land bounded by Wren Street, Pakenham Street, Cubitt Street, Langton Walk (school)/109</p> <p>10 – Islington Council</p>	<p>I write to confirm Islington Council’s support for the manner in which officers from both Islington and Camden councils have engaged on cross-boundary issues during the development of Camden’s Site Allocations DPD.</p> <p>We also note that you are proposing to allocate Site 30 (Pakenham Street) as either a secondary school or for mixed use development. We support the flexibility provided by this proposed allocation, and would like to use this opportunity to clarify that Islington is planning to meet demand for secondary school places within its own boundaries. Consequently, the redevelopment of the Pakenham Street site for nonschooling purposes</p>	<p>Support welcomed</p>

	would not be expected to have any detrimental impact on Islington.	
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Site 31: 187-199 West End Lane(p.120)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 31: (previously site 29) – 187-199 West End Lane/31 8 – Greater London Authority	<p>TfL welcomes the reinsertion of the following sentence: ‘Transport for London and Network Rail along with other train service operators have looked at options for improving transport interchange facilities in West Hampstead along with supporting infrastructure and associated public realm improvements’.</p> <p>TfL are aware that the planning application for this site has now been approved, and a Section 106 contribution has been agreed to support improvements to West Hampstead Overground station. Following on from this,</p> <p><i>TfL would recommend that a reference is included to highlight that money should be secured from other developments in the area to help facilitate the expansion of the station, alongside improved interchange in the West Hampstead area.</i></p>	<p>Enhancing transport interchange and pedestrian conditions is a key objective for the area, however planning obligations would have to meet all statutory tests and would have to be related to the scale and nature of proposals.</p> <p>Proposed modification: to insert text into introduction of this section to reflect that contributions may be sought to support these local objectives where appropriate</p>

Site 32:156 West End Lane, West Hampstead(p.123)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 32:156 West End Lane, West Hampstead/82 50 – Travis Perkins	<p>It is recognised that 156 West End Lane is a substantial parcel of land representing a significant regeneration opportunity. Travis Perkins supports the mixed-use redevelopment of the site in principle and would seek to facilitate this whilst protecting the operation of the business from the site. In developing the regeneration aspirations for the site through the emerging Site Allocations DPD Travis Perkins request that the matters raised are taken into account.</p> <p>Travis Perkins is a key contributor to the construction industry in Camden and intends to remain so. It noted that Policies CS8 and DP13 are relevant as they seek to protect existing employment sites. The site is easily accessible and well configured for continued employment use as part of the mixed-use redevelopment of the site.</p> <p>Recommend the Site Allocation 32 should be tightened up to recognise this need and include reference to Policy DP13 as the key consideration against which the redevelopment of 156 West End Lane should be assessed.</p>	<p>The allocation recognises and promotes the site as suitable for mixed uses including employment use; however policy does not extend to protection of specifically named users or occupiers.</p> <p>To address these representations it is considered appropriate to include reference to policy DP13 and also enhance the wording to reflect support for employment use.</p> <p>Proposed modification: amend text to reflect the above comments.</p>

Taking account of policy tests it is clear from Travis Perkins' intention to remain at the site and the on-going success of this particular branch that the site remains suitable for its existing business use.

Mixed-Use Redevelopment of 156 West End Lane

Mindful of experience at St Pancras Way and other mixed-use developments which combine Travis Perkins facilities with conventional market and affordable housing, we see no reason why our operation cannot be retained on the site and co-exist with residential accommodation.

The mixed-use redevelopment of 156 West End Lane, including the incorporation of the existing Travis Perkins, would be entirely compliant with each of the policy criteria. Whilst, housing may be considered a priority use in Camden, this is not reflected in the NPPF which instead clearly emphasises the Government's commitment to securing economic growth in order to create jobs and prosperity.

Conclusions

In conclusion, taking account of the matters summarised below there is nothing in either national or local planning policy which indicates 156 West End Lane should be redeveloped for housing at the expense of Travis Perkins:

- Travis Perkins is a thriving business wishing to remain operating on the site and continuing to provide jobs to the local community;
- The site has been identified as suitable and fit for purpose for continued employment use;
- Policy DP13 requires the retention of existing employment sites where the site is suitable for continued use;
- The site is ideal for mixed-use redevelopment, whilst retaining Travis Perkins;
- Camden Council has been aware for some time of Travis Perkins' intention to remain trading from the site and also the offer from the company to work in partnership with the Council to deliver the redevelopment of the site;
- 156 West End Lane is capable of satisfactorily accommodating a number of uses, including Travis Perkins and an element of housing in compliance with the Council's relevant planning policies; and
- The NPPF clearly outlines the requirement to protect and support existing businesses and adequately plan for the needs of these businesses.

	<i>Request that draft site allocation 32 is amended to clearly recognise the on-going interest of Travis Perkins in 156 West End Lane and the company's wish to remain operating from the site following its redevelopment.</i>	
Site 32: 156 West End Lane/32 8 – Greater London Authority	This site sits in close proximity to West Hampstead Overground station. The development of this site should therefore be consistent with the conditions set out for the 187-199 West End Lane development, so as to support improvements to the station. <i>We suggest that similar wording is used from the site (rep 8/31)above to emphasise the importance of improving interchange and public realm facilities at West Hampstead stations and along West End Lane.</i>	See related GLA comment on site 31 above.

Site 33: - O2 Centre Car Park(p.126)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 33: - O2 Centre Car Park/110 71 – Land Securities	We would like to register support for the proposed allocation and the guidance set out within the Submission Document. In this context, we would like the opportunity to take part in the Inquiry to speak in favour of the proposals, particularly if substantive objections have been made by other parties or individuals.	Support welcomed

Site 34: 100 Avenue Road, Swiss Cottage (Note: Incorrectly identified as Site 35 in published document) (p.129)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 34: 100 Avenue Road, Swiss Cottage/83 51 - Elsworthy Residents Association	It is imperative that any proposal for the replacement of the existing building should eliminate conflict between vehicle and pedestrian and this should be stated in this document.	The guidance indicates that development should be supported by public realm improvements with particular regard to pedestrian safety. The nature of these improvements will depend on the proposals that come forward. No proposed change.
Site 34: 100 Avenue Road, Swiss Cottage/84 52 – Dunning Properties Limited	Overall, we welcome the inclusion of this site in the Site Allocations DPD, and support the current proposed allocation. We do however consider that the proposed allocation does not adequately acknowledge or support the considerable potential for development, particularly residential development, at the site. The draft Site Allocations DPD is required to be assessed against tests set out in the NPPF following its publication and adoption in April 2012.	The plan has been assessed against the National Policy Planning Framework and a statement has been submitted which shows that it has been positively prepared and is justified and effective and in compliance with Nation Policy. It is considered that the allocation reflects

<p>In comparison to superseded PPS12: Local Spatial Planning, the NPPF requires that plans should be:</p> <ul style="list-style-type: none"> - Positively prepared – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; - Justified – the Plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence; - Effective – the plan should be deliverable over its period and based on proportionate evidence; - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the framework. <p>We contend that the document does not fully comply with the tests set out in the NPPF in that it has not been ‘positively prepared’ and nor is it fully ‘justified’ or in full accordance with national policy i.e. the NPPF.</p> <p>In addition, the DPD fails to take account of the relevant policies contained within the NPPF. Specifically, in relation to Site 35: 100 Avenue Road, the following NPPF policies need to be considered: Paragraph 14: Paragraph 22: Paragraph 23:</p> <p>The site allocation:</p> <ul style="list-style-type: none"> • Fails to adequately acknowledge the role for residential development on site • The overall objectives for the town centre listed on page 119 must be revised to include reference to the significant role that new residential development plays in sustaining and enhancing designated retail town centre locations. • The objectives on page 119 must also acknowledge the highly accessible nature of the area and the opportunities this brings for well conceived development at higher densities the objectives of both the London Plan and Camden’s LDF. • The sustainable town centre site location lends itself perfectly to the full range of retail/ food and drink development at ground floor level. It is not appropriate or justified to restrict the size of the ground floor units in such areas. • does not take into account paragraph 22 of the NPPF <p>The Council’s Employment Land Review (2008) states that there is no evidence of a shortage of space around Finchley Road / Swiss Cottage and the case for residential development on site should be enhanced in the DPD.</p> <p>The allocation must recognise the important role this site plays in acting as a gateway on the north-south axis and the DPD must therefore recognise the role that new development</p>	<p>the principles of the NPPF and is clear in supporting residential development, but to give the requisite emphasis the guidance could benefit from some amendment to aid clarity in respect of the operation of employment policy DP15 in respect of these offices and support for housing.</p> <p>In respect of the comments to the objectives on p119, these are those contained in the Core Strategy and this plan should reflect that. Specific text could be added to the allocation to reaffirm the recognised role that housing plays as part of the mix of uses in town centres and that it is a highly accessible location which supports redevelopment opportunities.</p> <p>Further minor amendments could address the other points raised that a mix of retail use sizes appropriate and give further emphasis that the principle of redevelopment is supported.</p> <p>Proposed modification: amend text to reflect the above comments.</p>
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	<p>and well considered architecture can have in creating and enhancing focal points within the townscape. Highly accessible gateway sites have significant potential for higher density developments.</p> <p>The DPD should acknowledge that the existing building is of limited architectural merit, that the site does not lie within a Conservation Area, and, at best, makes a neutral contribution to the surrounding townscape. The DPD must acknowledge and be explicit that there is clear scope for the comprehensive redevelopment of the site following demolition of the existing building. We welcome the acknowledgement that taller buildings have potential at this site, but we consider that the allocation should not be limited to the northern elements of the site. We note that the allocation should reflect that the mix of uses and quantum of affordable housing development at the site is subject to the economic viability of development and proper viability testing if required.</p> <p>In conclusion, we support the site allocation overall but consider that the site presents a major opportunity to deliver a residential led, mixed use development which will enhance Swiss Cottage town centre.</p> <p><i>The DPD needs to take account of the contents of the NPPF and be assessed against the tests in the NPPF.</i></p>	
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Site 36: Hawley Wharf, Water Lane and 39-45 Kentish Town Road(p.137)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 36: Hawley Wharf, Water Lane and 39-45 Kentish Town Road/126 3 - English Heritage	Further information It is welcomed that the areas heritage assets are identified. However it is also important to recognise the contribution those buildings and spaces not designated that help define the character of the area. This includes buildings (possibly mid 19th century) along Chalk Farm Road in the south west corner of the site, and villas (again approximately mid 19th century) along Hawley Road on the northern edge of the site. To help reinforce their value and influence upon the development of the site, <i>we would suggest that reference to their heritage interest and positive contribution to the distinctiveness of the area should be expressed in the Site allocations guidance</i> , with the expectation that they should be sustained and enhanced.	Proposed modification: include comment to reflect
Site 36: Hawley Wharf, Water Lane and 39-45 Kentish	The previous planning application for this site was rejected in March 2012. Proposals for a link between HS1 and HS2 continue to be reviewed by HS2 Ltd which could include widening of the existing viaduct, which would affect the area of the land available for	Proposed modification: to include reference to HS2.

Town Road/33 8 - Greater London Authority	development. Any development of the site should be consistent with HS2 safeguarding when it is published, and HS2 Ltd should be consulted on any future proposals for this site.	
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Site 37: 202-212 Regents Park Road (Roundhouse car park)(p.142)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 37: 202-212 Regents Park Road (Roundhouse car park)/34 8 – Greater London Authority	Proposals for a link between HS1 and HS2 continue to be reviewed by HS2 Ltd which could include widening of the existing viaduct, which would affect the area of the land available for development. Any development of the site should be consistent with HS2 safeguarding when it is published, and HS2 Ltd should be consulted on any future proposals for this site.	Proposed modification: to include reference to HS2.

Site 39: Bangor Wharf, Georgiana Street(p.147)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
Site 39: Bangor Wharf, Georgiana Street/14 6 - Environment Agency	We support the requirement that development ensures the design and layout responds positively to its canal setting, and contributes to the biodiversity and green nature of the canal. We also support the inclusion of advice regarding the need to investigate the potential for contaminated land through a preliminary risk assessment, prior to the submission of a planning application. Please be aware that the ‘canal’ constraint has not been identified in Appendix D of the sustainability appraisal	Support welcomed. The Sustainability Report has been updated.
Site 39: Bangor Wharf, Georgiana Street/105 69 - Canal Securities Limited	Support of the Draft Site Allocations for Site 39: Bangor Wharf, Georgiana Street. However, St Anselm has a number of comments regarding the changes of the site allocation to the one set out in the Additional Sites consultation document. Request that specific reference to affordable housing is removed. St Anselm supports the approach to utilise the canal for the construction of any development <i>St Anselm therefore request that specific reference to affordable housing is removed.</i>	Support welcomed. Affordable housing is a policy requirement (DP3) in schemes of 10 or more additional units. The policy operates a sliding scale on smaller housing schemes to assist viable delivery. An affordable housing requirement would depend on the amount of housing proposed in a future scheme and would be assessed in the light of proposals and submitted viability appraisals to support any deviation from policy requirements..
Site 39: Bangor	It is inevitable that at certain points in planning there will be conflict between policies.	This plan must be consistent with National

<p>Wharf, Georgiana Street/106</p> <p>70 - South Kentish Town CAAC - Camden Road Neighbourhood Forum</p>	<p>Camden has given high priority to housing, and set out plans to do so in the main Development Areas. Camden Road and its environs is not in a main development area for Camden, and fits the development Policy CS4 of 'more limited change', 'providing an appropriate mix of uses, including community facilities, and securing regeneration benefits'. We propose that Grays Inn Bridge become a new focus for local people and visitors, using the open space and heritage of the canal to best advantage.</p> <p>Enough housing: There has been much development of housing locally which has not been accompanied by any form of local balancing of retail or community provision, while the arrival of Sainsburys at Camden Town has seen closure of the smaller LMM stores and the Post Office in Royal College Street.</p> <p>A community facility: The Bangor Wharf site could be a 'community facility' (e.g. gardens, exhibition space, creative workshops) to enhance the significant historical and leisure aspect of this location</p> <p>Historic setting: Planning for Bangor Wharf should give attention to the likelihood increasing use of the tow path for tourists and improving the surrounding economy and community of Camden Road.</p> <p>Regents Canal Conservation Area lies adjacent to other Conservation Areas: Jeffrey's, Rochester and Camden Broadway at Camden Road, and Camden Town to the west.</p> <p>St Pancras Way has seen substantial – indeed major – recent housing development along a thin slither of land adjacent to Regents Canal. The 'wharf' character is lost, there is no useful access, and the building themselves – six storeys – block light out and have a dark, daunting character from the tow path walk. (Equally, their 'space maximising' on the St Pancras Way side is only relieved by a scrap of green grass on the light industry site opposite.)</p> <p>Bangor Wharf currently retains some original features. The canal-side was recessed, forming a docking area for probably several smaller buildings, and it retains some of its fronting road to the bridge. Notably also, there are steps from the towpath up to the bridge on the opposite bank, so that the site could be readily accessed by users of the towpath. To the northwest, the site is bordered by a light-industrial development of some architectural quality, relatively low build and open character.</p> <p>The Gray Inn / St Pancras Way bridge forms an interesting feature on the tow-path walk. On the north side of St Pancras Way, the Constitution Pub is beautifully set, and has</p>	<p>Policy and adopted policies. Whilst many of these objectives and aspirations are supported by policy and are laudable there is no evidence that they could all be deliverable through this plan.</p> <p>Reference to supporting business space for creative industries is appropriate in view of the nature of Camden Town as a centre for such enterprises. The guidance reflects these comments in many respects and refers to active frontages (duplicated in error) and provides guidance in respect of the canal and its setting.</p> <p>Proposed modification: add a reference to creative industries</p>
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	<p>capacity for catering. Behind, Camden Garden Centre is a valued and successful business.</p> <p><i>Redevelopment of the site to provide a community facility with open public access, including employment in local creative trades.</i></p> <p><i>Development will be expected to:</i></p> <ul style="list-style-type: none"> • <i>provide flexible employment space for creative industries</i> • <i>maximise the potential of the site as a community facility, e.g. garden, exhibition of the canalside, etc</i> • <i>provide a point of beauty and linkage midway along the canal between Camden Town and Kings Cross</i> • <i>contain an active frontage to Georgiana Street, Grays Inn Road Bridge and the canal towpath on north side</i> • <i>be of a form and scale which is appropriate to the Regents Canal Conservation Area, responding to the open character of this part of the canal and to surrounding listed buildings.</i> 	
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Site 40: 24-58 Royal College Street(p.153))

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 40: 24-58 Royal College Street/75</p> <p>46 – Royal Mail Group Ltd (RMG1)</p>	<p>RMG supports the proposed site allocation, which reflects the potential for the site to contribute to the supply of permanent housing (including affordable housing) and provide employment floorspace through the reprovision of the PFW distribution depot.</p> <p>The Council's aspiration to provide active frontages is also supported. RMG considers that there is potential for retail uses to meet the needs of the local community and create active frontages. Residential uses can be used to creative active frontages, through good design, but may not be appropriate at ground floor level, particularly on the St Pancras Way frontage which is a major route through the borough. RMG requests that the second bullet point of the draft site allocation is amended as follows to reflect the potential to provide</p>	<p>Support welcomed. Agree that other uses may contribute to active frontages.</p> <p>Student housing may be acceptable subject to criteria of DP9.</p> <p>Proposed modification: amended wording accordingly to reflect comments</p>

	<p>retail and/or community uses, to creative more active street frontages:</p> <p><i>“Provide retail and/or community uses to create active street frontages.”</i></p> <p>Given the size of the site and it’s accessibility to a number higher education institutions located within the borough, there may be potential for the provision of student accommodation alongside self-contained general needs housing, as part of a balanced mix of uses. RMG requests that the following bullet point is added to the draft site allocation to reflect this:</p> <p>“Student accommodation may also be appropriate as part of a mix of uses on the site.”</p> <p>RMG supports the Council’s longer-term aspirations for the regeneration of the area and improved links to King’s Cross Central, Camden Town and the Regent’s Canal.</p>	
<p>Site 41: 24 - 58 Royal College Street /128</p> <p>73 - Emily Gee</p>	<p>I am glad that some of my comments from the first round have been incorporated into this consultation draft. No further comments at this stage</p>	<p>Comments welcomed</p>

Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre (p.157)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery/85</p> <p>53 - Elaine Grove and Oak Village Residents Association</p>	<p><i>Add new sentence</i></p> <p><i>Developments should be designed to preserve the two nineteenth century buildings (the former Scout hut and adjoining hall) on the site</i></p>	<p>The proposal site does not include these buildings and designs will specifically need to have high regard in consideration of the setting of listed buildings and more generally in respect the consider the character and impact on neighbouring properties to come forward with acceptable proposals. No change proposed.</p>
<p>Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and</p>	<p><i>Add new sentence</i></p> <p><i>Amend as shown in red</i></p> <p><i>Consideration should be given to the retention/replacement of flexible B1 floorspace on the</i></p>	<p>The guidance supports retention and /or replacement of business space in line with Policy DP13. It is desirable to maintain opportunities for jobs near to where people</p>

<p>Lismore Circus Health Centre & Nursery/86</p> <p>53 - Elaine Grove and Oak Village Residents Association</p>	<p><i>site. If it is demonstrated that provision for existing or alternative employers on-site is not viable or feasible then alternative provision on another site could be appropriate provided it is the locality.</i></p>	<p>live and ideally if business space is reprovided it will be part of proposals or nearby.</p> <p>Proposed modification: insert “which should be in a suitable location as near as possible to the site”.</p>
<p>Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery/87</p> <p>53 - Elaine Grove and Oak Village Residents Association</p>	<p><i>Amend as indicated in red</i></p> <p><i>Make more efficient use of the sites to assist investment in existing housing and enable the provision of new housing and affordable housing, including intermediate affordable housing.</i></p>	<p>Affordable housing includes intermediate housing and current policies seek 40% of affordable housing to be intermediate. No change proposed.</p>
<p>Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery/88</p> <p>53 - Elaine Grove and Oak Village Residents Association</p>	<p><i>Amend as indicated in red</i></p> <p><i>Both sites could sustain higher building forms than at present subject to minimising the impact on neighbouring residential properties, listed buildings and the public realm and maintaining the low rise character of the area. Medium rise and high rise should be avoided.</i></p>	<p>We understand concerns about tall buildings. By restricting “medium rise” may restrict what could be potentially acceptable proposals. The guidance does not promote tall buildings. It highlights that scale needs to be carefully considered and needs to minimise impacts on neighbouring residential properties and listed buildings (including the church).</p> <p>The area contains a mix of styles and heights of buildings. Designs will need to respond to these different characters so acceptable proposals can come forward for planning permission. No change proposed.</p>
<p>Site 42: 115-117</p>	<p>The Cabinet has already made decision to demolish and redevelop Bacton Low Rise</p>	<p>Comments welcomed. The document is</p>

<p>Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery/89</p> <p>54 - Bacton Low Rise TRA</p>	<p>estate in combination with the site of the Gospel Oak District Housing office and the workshop units in Vicars Rd to build new homes on the sites.</p> <p>Detailed consultation is due to begin on the development of the Bacton project, our TRA has been working closely with the Council to develop approximately 5-7 floors of new homes. We want to see this document amended to reflect the process we have made in partnership with the Council so that local people can see how the neighbourhood will be improved and that the new development will offer many opportunities not just for new homes but employment/apprenticeships. We are concerned that as presently drafted it the LDF will make people think our project is made up of tower blocks; whereas our project is a much more people-friendly, low height typology and will be designed to a very high standard. We want our new homes to be to the Mayor's flagship design standards and to be the new way forward for Camden Council homes.</p> <p>These homes are very much required, it is very important to the people of Bacton low rise who are in desperate need of a warm dry secure home, energy efficient due to fuel poverty caused by lack of insulation to poor standard of past refurbishment programme under Capital Challenge. Along with bad overall design leading to anti social behaviour.</p> <p>As far as we as an organisation can see this section of the report in relation to, the Lismore Circus Health centre to be used for the Gospel Oak DHO site is old proposal's that is no longer required as the new proposals will and has achieved more to benefit not only our homes, families and surroundings we have managed to retain a piece of heritage along the way, by refurbishment of the new Bacton Low Rise TRA hall , As we have been to Camden Cabinet and worked closely and are still on going.</p> <p>In providing much needed family homes to the tenants and residents from the Bacton Low Rise estate' As part of the development of the new builds we have held discussions in relation to local tradesman of the area being employed along with apprenticeships and work experience.</p>	<p>intended to provide guidelines to support development that is the result of close working between local people and the Council and it is proposed to update the background information so references to evolving proposals and to consultation and the involvement of Bacton Low rise TRA and other stakeholders in the area is recognised. The guidance also supports provision of employment space and the opportunities for jobs/training.</p> <p>The guidance does not promote tall buildings. It highlights that scale needs to be carefully considered and needs to minimise impacts on neighbouring residential properties and listed buildings (including the church).</p> <p>Proposed modification: update context and background information to reflect local consultation and emerging proposals.</p>
<p>Site 42: 115-117 Wellesley Road (including 2-16 Vicars Road) and Lismore Circus Health Centre & Nursery/90</p>	<p>I would like to object strongly to the development proposed on the above site (2-16 Vicars Road). If a tall building were to be built on the neighbouring site to Barrington Court it would result in the loss of privacy, loss of sunlight and loss of views across central London for Barrington Court residents. The proposed development would undoubtedly cause a loss in value of our flat. New developments on the site should not be higher than two stories, so that the view to St Martin's church could be preserved.</p>	<p>Recognise concerns about tall buildings. The guidance does not promote tall buildings. It highlights that scale needs to be carefully considered and needs to minimise impacts on neighbouring residential properties and listed buildings (including the church).</p>

55 - Mrs Galatea Kamenova		Wide ranging consultation has and is taking place about schemes (including adjacent sites) and detailed proposals will be expected to consider these (and other) issues in taking forward high quality schemes. No change proposed.
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Site 43: 19-37 Highgate Road, Former Lenshaw House (A&A Storage) and 25– 37 Greenwood Place(p.160)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 43: 19-37 Highgate Road, Former Lenshaw House (A&A Storage) and 25– 37 Greenwood Place/91</p> <p>56 – A&A Self Storage Ltd</p>	<p>19 Greenwood Place is in need of upgrading in order to support my business and therefore I welcome its inclusion, in principle, with the Site Allocations Document.</p> <ol style="list-style-type: none"> 1. The allocation as a comprehensive mixed use redevelopment is sensible and represents the most likely option for implementation of the policies in the Core Strategy. It is justified. However, the wording of the Site Allocation does not allow for the implementation of the development or provide sufficient flexibility 2. The wording of the Site Allocation does not adequately recognise the need to redevelop 19 Greenwood Place in order to achieve the Council’s aim of enhancement of the Greenwood Centre facilities or to bring about the sustainable development of the Highgate Road site. 3. The site of 19 Greenwood Place has only recently been included in the site allocations. 4. Whilst the bulk of the site allocation falls within the Kentish Town Industry Area, in reality the existing uses do not warrant the protection afforded by this policy. 5. The National Planning policy Framework states at paragraph 21: <p>Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.</p> <ol style="list-style-type: none"> 6. Paragraph 19.34 of Camden’s Core Strategy states; ‘The current economic situation creates a particular need for sensitive and flexible implementation. 7. The site allocation as drafted would not support the existing business sector or explicitly allow for its expansion as required by bullet 3 of paragraph 21 of the NPPF 8. The passive nature of self-storage and office use would lend itself well to residential. The proposed redevelopment should not preclude residential and office use on the 19 Greenwood Place site as well. 9. The London Plan Policy 4.3 Mixed Use Development and Offices requires LDFs to develop approaches to mixed use developments and to take into account the contribution 	<p>Comments welcomed.</p> <p>It is considered that the current guidance provides sufficiently flexibility to support mixed used and individual components including expanded community use, employment use and housing.</p> <p>Improved and increased business space is supported subject to other policies and standards. However there is a strong presumption against uses which may not be compatible with other employment uses in the designated industry area (and this has been designated in the development plan and is not under review through this plan).</p> <p>Housing in proximity to potentially noisy activities can be jeopardised and in turn can jeopardise the efficient functioning of legitimate businesses.</p> <p>Hence a strong presumption against uses that would not be compatible, hence the guidance says housing should be focussed to the front of the site (outside the designated area). However there would be no in principle reason why a compatible employment/ business use</p>

that land use swaps can make to this provision.

10. Given that the Council is committed to the redevelopment of Greenwood Place it would be far preferable to consider the entire site allocation as capable of mixed use development. This would enable the proper comprehensive redevelopment of the site,

11. Furthermore, it is not clear if suitable access for pedestrians to a newly developed Greenwood Centre or adequate residential amenity for any dwellings on the site would be possible without the redevelopment of part or all of the self-storage building at 19 Greenwood Place.

12. To facilitate this there would need to be a phased development, which would include a presence onto Highgate Road of the B8 storage use. The description in the allocation should be amended to reflect this to include residential accommodation where this can be demonstrated to be compatible with surrounding uses

Redevelopment of the site to include mixed uses to include replacement D1 Community facilities and flexible employment floor space and housing to the site. Other uses, such as B1 and B8 or community use may be acceptable on the ground floor frontage to Highgate Road.

Development will be expected to :

Support the successful function of the Borough's designated Industrial Area but recognise the need for a mix of uses.

Include residential accommodation including affordable housing as part of a coherent mixed use scheme. Connect to an existing local energy network where viable.

Site Context

The building in between (previously known as Lenshaw House) is occupied by a self-storage company providing secure storage for domestic and business purposes and employment space. Both Greenwood Centre and Lenshaw House are located in the Kentish Town

As the Greenwood Centre lies within the Kentish Town industry area, replacement D1 and/or employment uses would be sought at this location. This new floorspace may also offer opportunities to provide replacement floorspace displaced from other sites that may emerge for redevelopment through the Community Investment Programme. The need to support Camden's diverse employment base and considerations of amenity mean that residential uses would not be considered appropriate in this part of the site but recognise that residential could be incorporated as part of a comprehensive redevelopment of the adjoining sites towards Highgate Road.

could also not extend to the front of the site as part of a comprehensive mixed use scheme –subject to design and amenity issues being adequately addressed. If the existing storage facility were not included then it is still considered that the guidance supports development of the other components of the site for D1 use and housing/mixed use respectively and designs would have to respond accordingly and proposals would be assessed in line with relevant standards.

	<p><i>Consolidated facilities could be delivered, which could release the Highgate Day Centre site for residential and other uses. Employment floorspace should form part of the mix of uses elsewhere within the site. Other office based facilities and social enterprises that provide employment opportunities, advice and training would be supported.</i></p> <p><i>However there is potential to redevelop parts of the site for housing Proximity to Highgate road may indicate that residential use at ground floor level may not be appropriate unless it is set back sufficiently, so alternative uses such as, business (including B8) or community facilities could be included to create an active frontage. New development should be designed and located so it does not significantly prejudice the nature of the Industry Area by introducing inappropriate uses, nor jeopardise the operation of existing and new businesses in the designated area. Redevelopment should not lead to the unacceptable loss of floorspace in use class B1-B8 and could be used to consolidate and improve the business environment, such as new modern floorspace and enhanced servicing. Adequate</i></p> <p><i>Further Information</i> <i>Subject to further consultation and option analysis the current building offers the potential to exploit the site more effectively and the site has significant redevelopment potential. New development could provide complementary facilities from which a range of employment opportunities and services could be delivered. The incorporation of adjacent sites would allow for an even more comprehensive approach and a mixed use development to improve the design and relationship of uses and buildings.</i></p>	
<p>Site 43: 19-37 Highgate Road, Former Lenshaw House (A&A Storage) and 25– 37 Greenwood Place/92</p> <p>57 – Kentish Town Neighbourhood Forum</p>	<p>We do not consider the site allocation guidance in the document to be justified in the matter of additional community use. The communities in question are happily installed in small discrete buildings situated in various places in Kentish Town. Moving them en masse to Greenwood Place is unnecessary, unkind and not in their best interests.</p> <p>Greenwood Place and the area around it is an extremely valuable and scarce development asset in Kentish Town. Once redeveloped there will be little opportunity for further development of any significance in Kentish Town apart from the Fire Station and Police Station sites. With this in mind, the utmost thought and consideration must be given to ensure that any development of these scarce assets meets the top priorities of people living and working in Kentish Town.</p> <p>It is clear that the top priorities in Kentish Town are housing and jobs for local people. The priority for Greenwood Place should therefore be for a mixed use scheme comprising the majority of social housing together with appropriate commercial space for the creation of</p>	<p>A decision has been made by the Council to redevelop the Greenwood Place site for new D1 uses. The guidance in the plan does encourage making more effective use of the buildings within this site. The site is already in community use (D1) which is protected through policies and is also located in a designated industrial area. Policies support new community uses (DP15) and also seek to limit other uses such as housing which may not be compatible (CS8). The guidance also seeks to protect and expand employment use so jobs can be created. New housing is supported at the front of the site which is</p>

	desperately needed new employment opportunities.	not in the industrial area. Affordable housing is currently proposed as part of the Councils plans, and would be sought in line with Policy DP3.
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Site 45: Fire Station, 20 Highgate Road(p.165)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 45: Fire Station, 20 Highgate Road/93</p> <p>58 - London Fire And Emergency Planning Authority (LFEPA)</p>	<p>LFEPA is the organisation responsible for the administration of the London Fire Brigade (LFB). Our comments relate to Kentish Town Fire Station, 20 Highgate Road, London NW5 (Site 45). Drivers Jonas Deloitte (DJD) made representations to you on behalf of LFEPA, in respect of the previous LB Camden site allocations document. Those comments were contained in DJD's letter dated 12th January 2011. However, their representations do not appear to have been fully reflected in the final submission for the Site Allocations DPD.</p> <p>2.0 The site currently comprises an operational fire station. It is possible that our client may wish to redevelop the property in the foreseeable future, to provide a more modern and flexible fire fighting facility. In such a redevelopment, it may be appropriate to include other uses (probably residential), to maximise the potential of the site.</p> <p>3.0 Should the station be declared surplus to the operational requirements of the LFB at any stage in the future, our client is likely to need to pursue a freehold disposal of the site. In those circumstances, it is considered that a high density mixed use redevelopment (without a fire station) would be appropriate for the property.</p> <p>We attach a suggested revision of the text for this property in the Site Allocations DPD.</p> <p><i>Site Allocation Guidance</i></p> <p><i>Redevelopment of the site to provide a mix of uses, including a replacement fire station, unless the station is declared surplus to the operational requirements of the London Fire Brigade (LFB).</i></p> <p><i>Development will be expected to:-</i></p> <ul style="list-style-type: none"> • <i>Maximise the potential of the site to provide new housing, whilst minimising conflicts between residential and other uses.</i> • <i>Provide an acceptable standard of residential accommodation for any new homes</i> 	<p>As the current guidance indicates as an important part of social/public infrastructure it is important that there should be adequate provision of services and any relocation or loss of facilities needs to be justified in accordance with policy DP15.</p> <p>It is considered that that the guidance is suitably flexible to support future decisions.</p> <p>Seeking to specify high density presupposes that high density is acceptable and in the absence of detailed analysis (best done at the application level) is not considered appropriate, particularly as the site is not in an identified growth area (CS2) or in a town centre (CS3). The guidance supports maximising the potential of the site for housing and this is considered sufficient to indicate support for the efficient use of land. No change proposed.</p> <p>Proposed modification: amend site boundary in plan and on Policies Map</p>

proposed for the site.

- Ensure that the amenity of nearby residents is respected.*
- Provide an appropriate level of affordable housing, in line with council policies.*
- Explore the potential for 'green' and 'sustainable' sources of energy.*
- Retain existing trees wherever possible and take opportunities for soft landscaping.*

Site Context

The site is located on a busy main road and it lies just outside Kentish Town Centre. The site is not within a conservation area, although there are listed buildings in the vicinity. The site is currently occupied by an operational fire station.

Main Policy Considerations

The site should continue to incorporate a fire station for as long as LFB has an operational need for the facility. Housing is the priority land use of the Local Development Framework. Therefore, the provision of housing is supported under CS6, DP2 and DP3. The provision of student housing on the site may be acceptable, subject to the requirements of DP9.

Further Information

The development of this site for a mix of uses brings the opportunity to provide high density residential accommodation in this highly accessible location and to improve the relationship of the site to the public realm at Highgate Road, Fortess Road and Fortess Walk.

If a redevelopment is to incorporate a new fire station, the amenity of nearby residents is to be respected, in line with CS5, DP26 and DP28. It is noted that consent has been granted for mixed use development incorporating an operational fire station and residential accommodation elsewhere in London, i.e. Millwall fire station/Canary South, Westferry Road, E14.

If the fire station is declared surplus to the operational requirements of LFB, the site is considered suitable for a high density mixed use development (without a fire station), incorporating residential accommodation.

Site 46: Former Nurses Hostel, 29 New End(p.167)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 46: Former Nurses Hostel, 29 New End/94</p> <p>59 – The Heath and Hampstead Society</p>	<p>The site allocation guidance is unsound/unacceptable, in that insufficient or no account is taken of the existing HOSTEL use class designation of the site.</p> <p>Use Class Designation- There is no justification for a site use change to C3 Residential, in view of the current serious shortfall in Camden of housing accommodation for homeless and vulnerable people, of student housing, and of affordable housing generally.</p> <p>LDF Policies DP4, DP7, DP8 and DP9 apply.</p> <p>This loss of hostel/affordable housing potential on this site is unacceptable/unsound. Whether the hostel accommodation previously provided has been re-provided elsewhere (see last para of Guidance) or not. The need in Camden for such accommodation massively exceeds any such re-provision.</p> <p>The Guidance refers to the inclusion of an affordable housing content, should development take the form of demolition and re-build. It does not call for this to be provided on site, and is therefore unacceptable/unsound. Any S106 offset agreement to provide such housing elsewhere would be counter to Camden’s policies on a diverse and inclusive community.</p> <p>LDP Policies DP3 and DP4 apply, especially DP 3.29.</p> <p>Insufficient priority is given to the refurbishment option, which would minimise disturbance in the neighbourhood and be more economic. A preference for refurbishment should therefore be expressed. In its absence, the Guidance is unacceptable/unsound.</p> <p>LDF Policy DP26 applies.</p> <p>Car Parking- The site should therefore be designated a car-free site. In the absence of such designation, the Guidance is unacceptable/unsound.</p>	<p>Replacement Housing: There is a well recognised and agreed need for a mix of housing including non-self contained housing with shared facilities in the borough.</p> <p>This plan must reflect adopted policies. Policy DP4 seeks retention or re-provision of affordable nurse hostels and Policy DP9 states that where adequate replacement of this kind of accommodation has been provided then an equivalent amount of residential floorspace should be provided including an appropriate amount of affordable housing (if required by Policy DP3). Policies DP7 and DP8 referred to in the representations apply to assessing other types of housing.</p> <p>The nurse's home was vacated in about 2005. It is understood that new nurse's accommodation was provided at the Royal Free Hospital (and the last bullet point requires re-provision or evidence of re-provision in the light of policy). This can be evidenced and assessed at the application level.</p> <p>Affordable Housing: The affordable housing expectation is specified and would generally be expected on-site in line with adopted policy DP3. However in accordance with adopted policies and guidance; subject to justifications at the planning application level off-site provision</p>

		<p>or financial contributions may be accepted in exceptional circumstances.</p> <p>Reuse/Refurbishment: this is a recognised option and further wording could reaffirm this.</p> <p>Car parking: As the plan states (p. 12) all proposals will be expected to comply with other relevant development policies and standards, including transport standards in respect of car free development. This will apply to all sites and as that section of the plan states this does not need to be duplicated throughout the plan.</p> <p>Proposed modification: amend text to include further reference to refurbishment /conversion as an option</p>
<p>Site 46: Former Nurses Hostel, 29 New End/95</p> <p>60 – Upper Hampstead Walk Board</p>	<p><i>It would be both important and appropriate to add that any development should also fit with the ‘setting’ of Kendalls Hall, a Grade II listed building directly opposite the nurses home on New End.</i></p>	<p>Proposed modification: amend text to refer to setting of further heritage asset</p>
<p>Site 46: Former Nurses Hostel, 29 New End/96</p> <p>61 – Professor Pascal Dubois-Pelerin</p>	<p>The last paragraph rightly states that any new replacement building should be sensitive to the character and topography of the area in its scale and massing, and should do no harm to the setting of neighbouring listed buildings like Christ Church and Lawn House. However I feel that it should be more specific. The current building is set well back and screened from the road, and any replacement building should be no closer to neighbouring properties, including New End itself. The document correctly praises the current building’s ‘relationship with neighbouring buildings’ and any replacement building should stick to the mass and scale that define such relationship.</p>	<p>Proposed modification: amend text to refer to respecting existing relationship</p>

Site 47: 40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir(p.169)

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Site 47: 40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir/15</p> <p>6 - Environment Agency</p>	<p>This site is in Source protection zone 1, it would therefore be inappropriate to include any potentially contaminating uses here. While we appreciate that it is indicated that the site will be used for residential, We feel it would be appropriate to mention this constraint in order to save time in the future developing schemes which we would object in principle to.</p>	<p>Proposed modification: add reference to constraint for information</p>
<p>Site 47: 40-49 St Edmunds Terrace, former car park and adjacent land to south of Barrow Hill Reservoir/97</p> <p>62 - Regents Park Estates (GP) Ltd</p>	<p>Montagu Evans LLP and our clients, Regents Park Estates (GP) Ltd (owner of Site 47), consider that the submission draft of the Site Allocations Development Plan Document (SADPD) is not sound nor legally compliant by virtue of not being consistent with National Planning Policy Framework and London Plan (2011) policy.</p> <p><i>As the National Planning Policy Framework and London Plan 2011 are current policy and are more recent than Camden Council's Core Strategy, the SADPD must reflect the contents of these documents. Ensuring deliverability, in particular by ensuring the viability, of schemes and 'optimising' sites' development potential must therefore be explicitly reflected in the SADPD.</i></p> <p><i>We consider therefore any reference to maximising development in the SADPD should be changed to optimising. Explicit reference to ensuring deliverability and viability must also be made, particularly when referring to the development of Site 47.</i></p> <p><i>We consider that the 'Site Allocation Guidance' for Site 47 should read:</i></p> <p><i>Residential-led redevelopment to optimise this unique site whilst ensuring the deliverability and viability of such a scheme as well as safeguarding the setting of and views from Primrose Hill</i></p> <p><i>Development will be expected to:</i></p> <ul style="list-style-type: none"> - <i>Optimise the potential of the site to provide new housing (including affordable housing)</i> - <i>Be of an appropriate scale, bulk and mass so as not to appear overly dominant in the St Edmund's Terrace street scene or when viewed from surrounding parkland</i> - <i>Contribute towards the verdant streetscape of St Edmund's Terrace and address</i> 	<p>We consider that as well as reflecting the NPPF and London Plan the use of the word "optimising" can support a more qualitative measure of particular proposals on particular sites and in particular contexts (and not just quantitative).</p> <p>Viability is recognised as a key consideration in plan and decision-making in the NPPF and deliverability is a key issue of soundness. Our Core Strategy, Development Policies and supplementary guidance similarly place relevant emphasis on viability considerations.</p> <p>As indicated in the introduction to the March 2012 proposed submission (p.12) viability is recognised as an important factor in assessing proposals. The viability and affordability of specific proposals can be suitably appraised and tested through the pre-application and application process.</p> <p>If viability is included specifically here it could imply that it is not such a factor elsewhere when it is equally relevant to</p>

	<p><i>community safety through design</i></p> <ul style="list-style-type: none"> - <i>Safeguard important views from Primrose Hill</i> - <i>Provide on site open space and enhance the quality of adjacent spaces</i> 	<p>other sites and would need to be repeated throughout - hence the overarching recognition in the introduction of this plan.</p> <p>The Council see no benefit in duplicating a recognised principle of its adopted plan and guidance and Government policy throughout the plan.</p> <p>Proposed modification: amend text to replace “maximise” with “optimise”</p>
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Additional sites

Representation	Summary of Representation/Proposed Change(<i>in italics</i>)	Council Response/Proposed Modification
<p>Additional sites: Former Royal Ear Hospital Capper Street and Former UCL Student Union 43 Huntley Street, London/70</p> <p>43 - University College London Hospitals NHS Foundation Trust (UCLH)</p>	<p>UCLH propose to include two further sites from their Estate within the DPD and allocate the sites for medical and healthcare uses in order to provide site allocations to support the future phases (phase 6) of the development of the hospital campus.</p> <p>Former Royal Ear Hospital Capper Street Former UCL Student Union 43 Huntley Street, London</p> <p>It is recognised that it may be too late to include these site within this document. Nevertheless details relating to the development principles for these sites will be provided within the emerging Fitzrovia Area Action Plan.</p>	<p>These two sites have come forward and are identified in the Fitzrovia AAP as opportunity sites which will establish policy principles which do not need to be established or repeated in this plan. No change proposed.</p>
<p>Additional Site: 163 Iverson Road, West Hampstead, NW6 2RB/101</p> <p>66 - Winbush Properties Ltd</p>	<p>We do not consider the Proposed Submission version of the Site Allocations DPD to be sound because it does not take into account the NPPF or other suitable / deliverable sites.</p> <p>The document should identify 163 Iverson Road as a suitable site for housing. This site is available and suitable for housing development and can enable the delivery of sustainable development in line with policy.</p> <p><i>The Proposed Submission Site Allocations DPD should consider 163 Iverson Road as a site allocated for housing. This will ensure some of the future housing need is met on a brownfield, sustainable site which can be integrated into an existing residential area.</i></p>	<p>The timing of preparation of plans does not always coincide with sites becoming available and deliverable. There is recognition that the site has development potential and this is borne out by planning permission having been granted. There are considered to be sufficient sites in the plan allocated to help deliver the number of homes and jobs envisaged in the London Plan and this plan focuses on larger sites that can help deliver these</p>

		<p>objectives. This site will it is recognised also contribute.</p> <p>This site has a number of factors: it is over the size criteria by about 300 sqm , but this is not the only factor. It has a relatively wide site frontage to Iverson Road, but is relatively shallow and adjacent to Thameslink railway lines and the new ticket hall and bridge with commensurate noise and amenity issues to address. It has areas of ecological interest to the north.</p> <p>These factors would have been taken into account during determination of the most recent planning application to agree the principles of development. Now that these have been established there is considered to be no overriding need for its allocation. No change proposed.</p>
<p>Additional Site: Land at Midland Crescent, Finchley Road/102</p> <p>67 - Stadium Capital Holdings</p>	<p>Developing the site for a high quality mixed use development would assist in meeting the vision for growth in the West Hampstead Interchange Growth Area.</p> <p>We propose to develop the site as a mixed use development with the potential to include: retail, commercial, offices, hotel, community facilities, residential, student accommodation and entertainment uses. It is anticipated development will occur on this site within 5 years.</p> <p>According to the Council's Regulation 25 Statement of Consultation, a decision was taken not to include the site within the Preferred Approach document. The reason given is as follows:</p> <p>"the site is mostly covered by an Open Space Designation. Camden does not propose to change this designation and has policies which seek to protect such designations. In this context this site has some but limited development opportunity but and not significant enough to warrant an allocation."</p> <p>It is therefore clear that the exclusion of the site from the Site Allocations DPD is based upon a historic designation overturned by a Planning Inspector and is therefore not</p>	<p>It is recognised that this site is no longer designated as open space and has not been considered as such since August 2010.</p> <p>The comment referred to in the Regulation 25 Statement (p.47) published with the proposed submission document relates to the officer response following consultation on the issues and options stage. This was correct at that time and reflects the response made at that time. The preferred approach consultation document (November 2009) includes Appendix 1 which also refers to the site and the open space designation as the factor for non-inclusion again reflecting the position at that time.</p>

justified, and so the document is unsound. It can not be said that the document is founded on a robust and credible evidence base given the misrepresentation of the site as designated open space.

Summary

It is also envisaged that the sites prominent location offers the potential for an iconic building of outstanding architectural quality, which would be a significant improvement on the scheme with extant consent. In addition, significant discussions have been held with development control officers at Camden, through the formal pre-application process, regarding the wider development potential for the site. Feedback suggests that, they would be supportive of the principle of the site's development.

Through representations to the Site Allocations document we consider that it should be allocated for a high density mixed use development. It will assist the Council in meeting its growth objectives in the West Hampstead Interchange growth area.

Unfortunately, as it stands the document can not be considered justified, and is therefore not sound. The inclusion of the site discussed above would help rectify this.

The site should be included in the final Site Allocations Document DPD as a site capable of delivering a significant scale of development in the lifetime of the plan. A plan of the site is attached (above) to this form. The site is within an identified growth area (CS1) where council expects mixed use development to maximise site opportunities in line with the identified objectives for West Hampstead Interchange (CS2), whilst encouraging a mix of employment facilities (CS8) retail (CS7) and protecting and enhancing the adjacent open spaces (CS15). Housing is the priority land use and will be sought as part of more efficient use the site (CS6 and DP2)

To make the document sound it should acknowledge that the site is no longer open space, and it should be allocated for mixed use development reflecting the above, including: retail, commercial, offices, hotel, community facilities, residential, student accommodation and entertainment uses.

The Inspectors report including the recommendation de-designating the site as open space (p.25 3.84) was received in August 2010.

The report to Cabinet in October 2011 to approve the proposed submission version included a further appendix which identified sites not proposed for inclusion. This site was identified and says "Whilst the open space designation has been removed in this context this site has some development potential, but not strategic enough to warrant an allocation."

This highlights that the site has been reconsidered for inclusion. It is worth noting that the other previous open space site de-designated by the LDF Inspector has been included in this plan (Site 15: Land at Goldsmiths House).

It is also worth noting that the Inspectors report into the Core Strategy stated this site's de-designation "does not signal any endorsement for development of the land, but rather encourages a more realistic view of its future role".

There are considered to be sufficient sites in the plan allocated to help deliver the number of homes and jobs envisaged in the London Plan and this plan focuses on larger sites that can help deliver these objectives.

There is recognition that the site has some development potential. However the

		<p>allocation of this site has a number of factors: it is over the size criteria, but this is not the only factor. It has a reasonable site frontage to Finchley Road (which has planning permission), but has a relatively narrow tapering shape in between railway lines with commensurate noise and amenity issues to address. It has designated open space/areas of ecological interest to the north side and a habitat corridor to the south. More detailed justification is required to enable proper assessment of impacts on ecology/biodiversity (e.g. through overshadowing).</p> <p>There are a number of particular impacts and issues that need to be considered on this particular site and involve weighing up a range of competing issues. It is arguable whether the high density scheme with all the uses advocated could be satisfactorily accommodated on this particular site without assessment at the detailed planning application stage where detailed design, impacts on ecology and supporting justifications for specific proposals can be better assessed. No change proposed.</p>
<p>Additional Site: 10 Walkden House, NW1 2EJ/103</p> <p>68 - Transport Salaried Staff's Association (TSSA)</p>	<p>Consider that Walkden House, 10 Melton Street., NW1 2EJ should be included as site for a mixed use office and residential development within the site allocations development plan document</p> <p>Consider that omitting Walkden House within the submission site allocation plan – section 3 – Euston - is not justified, effective or consistent with National Policy.</p> <p><i>On behalf of the TSSA we would request that Walkden House, 10 Melton Street, NW1 2EJ, as shown in Appendix 1 to this submission, is included within the site allocations document for a mixed use office residential development.</i></p>	<p>There is recognition that the site has development potential and this is borne out by planning permission having been granted. There are sufficient sites in the plan allocated to help deliver the number of homes and jobs envisaged in the London Plan and this plan focuses on larger sites that can help deliver these objectives.</p> <p>A Euston Area Plan is starting to be</p>

		prepared which will establish policy principles and guidance for a broader area to address the wide impacts and implications of HS2 at a more detailed level. It is anticipated that this will include further (and smaller) sites and this sites allocation can be considered in that context. No change proposed.
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Omissions

Omission/20 11 - London Diocesan Board for Schools	The plan is a first rate document in respect of each individual site, but it does not look at the holistic picture for the Borough. <i>Camden should identify a site or sites where a new secondary school could be built to satisfy demand once the forthcoming school places crisis becomes apparent.</i>	Positive comment welcomed. The plan actually identifies Site 30 at Wren Street as a potential location for a secondary school subject to future review of pupil projections and capacity taking into account the completion of the new secondary school at Swiss Cottage (included itself in previous iterations of the SA DPD but nearing completion) and other capacity improvements such as at Regent High School (formerly South Camden Community School).No change proposed.
Omission Site: 1 Regis Road, London NW5 3EW/98 63 - Bell Cornwell LLP	Further to our earlier submissions on 28th November 2008 and 29th January 2010 concerning the draft Site Allocations documents, we raise OBJECTION to the current document above for its omission of 1 Regis Road for a Mixed Use Commercial and Residential Development, for all the reasons previously stated and demonstrated in the Planning Pre-Application Submission.	We consider the previous reasons given for not allocating this relatively small site are still justified and that a proposal for this site is most appropriately assessed through a planning application against relevant development plan policies and supplementary guidance. No change proposed.
Omission Site: Gondar Gardens Reservoir Site/99 64 - Miles A Seaman	There no mention of the Gondar Gardens reservoir site in the site allocation plan	No further representations have been received to include this site. This plan is positive in supporting growth and appropriate development; however the Gondar Gardens reservoir site is predominantly designated private open space with associated ecological interest.

		<p>By including the site as an "allocation" could imply that the principle of development of all or certain parts of the designated part of site has been fully accepted. It would override a policy designation established through examination of the Core Strategy and Development Policies documents adopted in 2010.</p> <p>This plan is not reviewing or proposing changes to existing boundaries of designated open spaces already established in the adopted plan and policies map.</p> <p>There are a number of particular impacts and issues that need to be considered on this particular site and means weighing up a host of complex and competing issues.</p> <p>This is considered to be best done at the pre-application and planning application level where detailed design, ecological impacts and supporting justifications for specific proposals can be better assessed.</p> <p>The complex range of issues is revealed by the most recent refusals of planning permissions one of which is subject of a current appeal. No change proposed.</p>
<p>Omission Site: Stephen Street and 18-30 Tottenham Court Road/100</p> <p>65 - 25 Gresse Street Tenants and</p>	<p>The document should include the Central Cross development. It is a major development and a "significant site," particularly given the fact that it includes Tottenham Court Road and I would think that it fits the remit of your Site Allocations Development Plan Document (DPD).</p>	<p>This site has been identified as an opportunity site in the Fitzrovia Area Action Plan and which will establish policy principles which do not need to be established or repeated in this plan. No change proposed.</p>

Residents Association		
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List of Specific Consultation Bodies

BRITISH WATERWAYS LONDON	LONDON BOROUGH OF HILLINGDON
CAMDEN NHS PRIMARY CARE TRUST	LONDON BOROUGH OF ISLINGTON
CITY OF LONDON CORPORATION	LONDON BOROUGH OF KENSINGTON AND CHELSEA
CITY OF WESTMINSTER	LONDON BOROUGH OF KINGSTON
COAL AUTHORITY	LONDON BOROUGH OF LAMBETH
ENGLISH HERITAGE	LONDON BOROUGH OF LEWISHAM
ENVIRONMENT AGENCY	LONDON BOROUGH OF MERTON
GOVERNMENT OFFICE FOR LONDON	LONDON BOROUGH OF NEWHAM
GREATER LONDON AUTHORITY/MAYOR OF LONDON	LONDON BOROUGH OF REDBRIDGE
HIGHWAYS AGENCY	LONDON BOROUGH OF RICHMOND
LONDON BOROUGH OF BARKING AND DAGENHAM	LONDON BOROUGH OF SOUTHWARK
LONDON BOROUGH OF BARNET	LONDON BOROUGH OF SUTTON
LONDON BOROUGH OF BEXLEY	LONDON BOROUGH OF TOWER HAMLETS
LONDON BOROUGH OF BRENT	LONDON BOROUGH OF WALTHAM FOREST
LONDON BOROUGH OF BROMLEY	LONDON BOROUGH OF WANDSWORTH
LONDON BOROUGH OF CROYDON	LONDON DEVELOPMENT AGENCY
LONDON BOROUGH OF EALING	METROPOLITAN POLICE CAMDEN
LONDON BOROUGH OF ENFIELD	MOBILE OPERATORS ASSOCIATION
LONDON BOROUGH OF GREENWICH	NATIONAL GRID
LONDON BOROUGH OF HACKNEY	NATURAL ENGLAND
LONDON BOROUGH OF HAMMERSMITH & FULHAM	NETWORK RAIL
LONDON BOROUGH OF HARINGEY	THAMES WATER PROPERTY SERVICES
LONDON BOROUGH OF HARROW	TRANSPORT FOR LONDON
LONDON BOROUGH OF HAVERING	
LONDON BOROUGH OF HAVERING	

Appendix 2

List of General Consultation Bodies

Emails sent		
ABBEY COMMUNITY CENTRE	BEDFORD ESTATES	CAMDEN CIVIC SOCIETY
ABBEY ROAD HOUSING CO-OPERATIVE	BELIEVE IN BELSIZE	CAMDEN COMMUNITY EMPOWERMENT NETWORK
ACTON AND SWINTON STREETS RESIDENTS ASSOCIATION	BELSIZE GROVE (5-7) RESIDENTS AND TENANTS ASSOCIATION	CAMDEN COMMUNITY LAW CENTRE
ADRIAN SALT AND PANG LIMITED	BELSIZE HOUSING ASSOCIATION	CAMDEN CYCLING CAMPAIGN
AFRICAN SWAHILIPHONE REFUGEE PROJECT	BELSIZE RESIDENTS ASSOCIATION	CAMDEN CYPRIOT WOMEN'S CENTRE
AGE CONCERN CAMDEN	BELSIZE VILLAGE RESIDENTS AND TRADERS ASSOCIATION	CAMDEN FEDERATION OF TENANTS AND RESIDENTS ASSOCIATIONS
ALBERT STREET NORTH RESIDENTS ASSOCIATION	BLADDER AND BOWEL FOUNDATION	CAMDEN NHS PRIMARY CARE TRUST
ALLIANCE PLANNING	BLOC	CAMDEN SQUARE CAAC
ALSOP VERRILL	BLOOMSBURY ASSOCIATION	CAMDEN SQUARE NEIGHBOURHOOD ASSOCIATION
ALVANLEY GARDENS RESIDENTS ASSOCIATION	BLOOMSBURY VILLAGE RENAISSANCE PROJECT	CAMDEN TOWN COMMUNITY FORUM
AMPTHILL SQUARE TENANTS ASSOCIATION	BME ALLIANCE (CAMDEN)	CAMDEN TOWN UNLIMITED
ANCIENT MONUMENTS SOCIETY	BNP PARIBAS	CAMDEN TRAINING NETWORK
ARKWRIGHT MANSIONS RA (AMRA)	BRIARDALE GARDENS NEIGHBOURHOOD ASSOCIATION	CAMDEN VILLAGE ASSOCIATION
ARKWRIGHT ROAD RESIDENTS COMMITTEE	BRITISH LAND COMPANY PLC	CANFIELD PLACE RESIDENTS ASSOCIATION
ARP ARCHITECTS	BRITISH LIBRARY BUSINESS AND IP CENTRE	CAROE AND PARTNERS
ARTHRITIS CARE	BRITISH TRANSPORT POLICE	CAROL STREET HOUSING CO-OP
ARTSLINE	BRITISH WATERWAYS LONDON	CASTLEHAVEN COMMUNITY ASSOCIATION
ASH SAKULA ARCHITECTS	BRITISH WATERWAYS LONDON	CB RICHARD ELLIS LTD (CLIENT: UNIVERSITY COLLEGE LONDON)
ASIAN WOMEN LONE PARENTS ASSOC	BROD WIGHT ARCHITECTS	CENTA BUSINESS SERVICES
ASSOCIATION OF CAMDEN COUNCIL LEASEHOLDERS	BRUNSWICK TENANTS AND RESIDENTS ASSOCIATION	CENTRAL AND NORTH WEST LONDON NHS TRUST
ASSOCIATION OF COMMUNITY BASED BUSINESS ADVICE	BUSINESS IN THE COMMUNITY	CENTRAL SAINT MARTINS
BARNFIELD AND WOODFIELD TENANTS AND LEASEHOLDERS ASSOCIATION	CABE	CENTREPOINT RESIDENTS ASSOCIATION
BARTHOLOMEW AREA RESIDENTS ASSOCIATION	CAMDEN ARCHITECTS FORUM	CHAIR GARA
BAYHAM PLACE RESIDENTS ASSOCIATION	CAMDEN BANGALI RESIDENTS ASSOCIATION	CHALK FARM HOUSING GROUP
	CAMDEN CARERS CENTRE	CHALK FARM PARKING ACTION GROUP
	CAMDEN CHINESE COMMUNITY CENTRE	CHARLOTTE STREET ASSOCIATION
	CAMDEN CHINESE COMMUNITY NURSERY	CHESTERFORD GARDENS AND FROGNAL LANE

RESIDENTS ASSOCIATION
CHETWYND AND TWISDEN ROADS RESIDENTS ASSOCIATION (CTRRA)
CHINESE INFORMATION AND ADVICE CENTRE
CHRISTCHURCH AREA NEIGHBOURHOOD ASSOCIATION
CHURCHWAY TENANTS & RESIDENTS ASSOC.
CIRCLE ANGLIA
CITY FRINGE PARTNERSHIP
CITY OF LONDON (OPEN SPACES DEPARTMENT)
CITY OF LONDON CORPORATION
CIVIC TRUST
CLEVELAND STREET NEIGHBOURHOOD WATCH
COCKPIT ARTS
COLLIERS CRE
CONFEDERATION OF BRITISH INDUSTRY (SME)
CORPORATION OF LONDON
COUNCIL FOR BRITISH ARCHAEOLOGY
COVENT GARDEN AREA TRUST
COVENT GARDEN COMMUNITY ASSOCIATION
COVENT GARDEN HOUSING CO-OP
CPRE
CRASH
CREATEKX
CREDITON HILL RESIDENTS ASSOCIATION
CROSSRAIL
CROSSRAIL (SAFEGUARDING TEAM)
CROSSROADS WOMENS CENTRE
CUMBERLAND MANSIONS LIMITED
CUNNANE PLANNING
CURNOCK STREET TENANTS AND RESIDENTS ASSOCIATION
CUSHMAN AND WAKEFIELD (CLIENT: MULLER PROPERTY HOLDINGS GROUP LTD)
DALTON WARNER DAVIS
DARTMOUTH PARK CAAC
DARTMOUTH PARK RESIDENTS ASSOCIATION

DEFEND COUNCIL HOUSING (CAMDEN)
DESIGN COUNCIL
DEVONSHIRE HOUSE SCHOOL
DISABILITY IN CAMDEN - DISC
DP9 (CLIENT: BRITISH LAND)
DPDS CONSULTANCY GROUP
DRILL HALL
DRIVERS JONAS (CLIENT: BRITISH LIBRARY)
DRIVERS JONAS (LONDON FIRE AND EMERGENCY PLANNING AUTHORITY (LFEPA))
EDAW (CLIENT: ROYAL VETERINARY COLLEGE (UNIVERSITY OF LONDON))
ELLIOTT SQUARE RESIDENTS ASSOCIATION
ELM VILLAGE RESIDENTS AND TENANTS ASSOCIATION
ENGLISH HERITAGE
ENVIRONMENT AGENCY
ESA PLANNING
ETHIOPIAN COMMUNITY IN BRITAIN
FAREBROTHER CHARTERED SURVEYORS
FEDERATION OF PRIVATE RESIDENTS ASSOCIATIONS
FERNCROFT AVENUE RESIDENTS ASSOCIATION
FINCHLEY ROAD COMMUNITY FORUM
FIRST PLAN
FITZJOHNS AVENUE RESIDENTS ASSOCIATION
FITZROY PARK RESIDENTS ASSOCIATION
FORDWYCH RESIDENTS ASSOCIATION
FORESTRY COMMISSION
FRIENDS OF ARGYLE SQUARE
FRIENDS OF ST GEORGE'S GARDENS
FRIENDS OF THE EARTH CAMDEN
FROGLIFE
FUSION ONLINE LIMITED
FUSION ONLINE LTD
GARA
GARDEN HISTORY SOCIETY
GAYTON RESIDENTS ASSOCIATION

GENESIS HOUSING GROUP
GEORGIAN GROUP
GERALD EVE
GL HEARN
GLASS-HOUSE COMMUNITY LED DESIGN
GLENHURST AVENUE RESIDENTS ASSOCIATION
GLOUCESTER CRESCENT RESIDENTS ASSOCIATION
GODWIN AND CROWDALE TENANTS MANAGEMENT CO-OPERATIVE
GOVERNMENT OFFICE FOR LONDON
GR PLANNING
GRAFTON AREA RESIDENTS ASSOCIATION
GREAT ORMOND STREET HOSPITAL FOR CHILDREN NHS TRUST
GREATER LONDON AUTHORITY
GREATER LONDON ENTERPRISE
GREENHILL RESIDENTS ASSOCIATION
GROUNDWORK CAMDEN AND ISLINGTON
GROUNDWORK NORTH LONDON
GUINNESS TRUST
HADDO LEASEHOLDERS ASSOCIATION
HAMPSTEAD CAAC
HAMPSTEAD COMMUNITY CENTRE
HAMPSTEAD CONCERN RESIDENTS GROUP
HAMPSTEAD HEATH
HEATH AND HAMPSTEAD SOCIETY
HEATH DRIVE RESIDENTS ASSOCIATION
HEATH HURST ROAD ASSOCIATION
HIGHGATE BUSINESS CIRCLE
HIGHGATE CONSERVATION AREA ADVISORY COMMITTEE
HIGHGATE NEWTOWN COMMUNITY CENTRE
HIGHGATE SOCIETY
HIGHGATE WEST HILL RESIDENTS ASSOCIATION
HIGHWAYS AGENCY
HOLBORN COMMUNITY ASSOCIATION

HOLBORN DISTRICT MANAGEMENT COMMITTEE
HOLLY LODGE ESTATE COMMITTEE
HOME BUILDERS FEDERATION
HOME-START CAMDEN IN HOLBORN
INDIGO PLANNING
INGESTRE COMMUNITY CENTRE
INHOLBORN BID
INKERMAN AREA RESIDENTS ASSOCIATION
INKERMAN AREA RESIDENTS ASSOCIATION
INLAND WATERWAYS ADVISORY COUNCIL (IWAC)
INTERCHANGE LEGAL ADVISORY SERVICE
IRISH ELDERS OUTREACH PROJECT
JAMES WIGG PRACTICE
JCL PLANNING
JEFFREYS STREET ASSOCIATION
JEHOVAH'S WITNESSES IN CAMDEN (CONGREGATION OF)
JONES LANG LASALLE
JUDD STREET RESIDENTS ASSOCIATION
KENNET PROPERTIES
KENTISH TOWN CITY FARM
KENTISH TOWN ROAD ACTION (KTRA)
KIDDERPORE AVENUE RESIDENTS ASSOCIATION
KILBURN BUSINESS PARTNERSHIP C/O KILBURN TOWN CENTRE MANAGER
KING'S CROSS CONSERVATION AREA ADVISORY COMMITTEE
KINGS CROSS RAILWAY LANDS GROUP
KX HOTEL NETWORK
LAND SECURITIES
LANGBOURNE (17-24) LEASEHOLDERS ASSOCIATION
LATIN AMERICAN ASSOCIATION
LAWN ROAD AND DOWNSIDE CRESCENT RESIDENTS ASSOCIATION

LEVERTON STREET AND RILEY MEWS TENANTS ASSOCIATION
LEVVEL LTD (CLIENT: MCCARTHY AND STONE)
LITTLE GREEN STREET WEBSITE
LIVING STREETS
LIVING STREETS KING'S CROSS
LOCAL DIALOGUE
LONDON BAT GROUP
LONDON CHAMBER OF COMMERCE AND INDUSTRY
LONDON COUNCILS
LONDON FIRE BRIGADE
LONDON FIRST
LONDON HEALTH OBSERVATORY
LONDON HISTORIC PARKS & GARDENS TRUST
LONDON TRAVEL WATCH
LONDON UNDERGROUND LIMITED
LONDON WILDLIFE TRUST
LONDON'S SWIFTS
MACCREANOR LAVINGTON ARCHITECTS
MANSFIELD NEIGHBOURHOOD ASSOCIATION
MANSFIELD RESIDENTS PARKING COMMITTEE
MARCHMONT COMMUNITY CENTRE
MECKLENBURGH SQ RESIDENTS ASSOCIATION
MEDICAL FOUNDATION FOR THE CARE
METROPOLITAN POLICE CAMDEN
MIND IN CAMDEN GROVE CENTRE ADVOCACY SERVICE
MONTAGU EVANS
NATIONAL AIR TRAFFIC SERVICE
NATIONAL GRID
NATIONAL TRUST
NATURAL ENGLAND
NETWORK RAIL
NHS LONDON HEALTHY URBAN DEVELOPMENT UNIT
NORTH LONDON STRATEGIC ALLIANCE
NORTH LONDON WASTE AUTHORITY

NOTTING HILL HOUSING
ONE HOUSING GROUP TENANTS FORUM
ORIGIN
OSSULSTON TENANTS AND RESIDENTS ASSOCIATION
PADDINGTON CHURCHES HOUSING ASSOCIATION
PARAMOUNT COURT RESIDENTS ASSOCIATION
PEABODY TRUST
PEACOCK AND SMITH (CLIENT: MORRISONS SUPERMARKETS)
PEACOCK AND SMITH LTD
PHOENIX GARDENS
PILGRIMS TO WILLOUGHBY RESIDENTS ASSOCIATION
PIRATE CLUB
PLANNING POTENTIAL
PLATTS LANE RESIDENTS ASSOCIATION
POND SQUARE RESIDENTS ASSOCIATION
PRIMROSE HILL BUSINESS ASSOCIATION
PRIMROSE HILL CAAC
PRIMROSE HILL COMMUNITY CENTRE
PRYORS LIMITED (THE)
QUADRANT GROVE RESIDENTS ASSOCIATION
QUAKERS IN BRITAIN
QUEENS CRESCENT COMMUNITY CENTRE
QUEENSMEAD NW8
RANULF ROAD RESIDENTS' ASSOCIATION
RED LION TENANTS AND RESIDENTS ASSOCIATION
REED'S AND ROCHESTER PLACE NEIGHBOURHOOD ASSOC
REGAL LANE LIMITED
REGENT'S PARK CONSERVATION AREA ADVISORY COMMITTEE
ROCHESTER TERRACE GARDENS RESIDENTS ASSOCIATION
ROGER TYM
ROLFE JUDD

ROLFE JUDD PLANNING (CLIENT: POCKET LIVING)
ROYAL PARKS
ROYAL VETERINARY COLLEGE
RUDALL CRESCENT RESIDENTS ASSOCIATION
RUGBY & HARPUR RES ASSOC
RYLAND ROAD RESIDENTS
RYLAND ROAD RESIDENTS ASSOCIATION
SAINT GEORGES TERRACE RESIDENTS ASSOCIATION
SAINT MARTINS COMMUNITY CENTRE
SAINT MARTINS TENANTS ASSOCIATION
SAINT MUNGOS
SAINT PANCRAS AND SOMERS TOWN SAFER NEIGHBOURHOODS
SANDY ROAD AND THE VILLAGE RESIDENTS ASSOCIATION
SAVE OUR GREEN
SAVE OUR STREET (FLEET ROAD)
SAVILLS
SEC GARA
SHIRE CONSULTING (CLIENT: BARCLAYS BANK PLC)
SOCIETY FOR THE PROTECTION OF ANCIENT BUILDINGS
SOMALI COMMUNITY CENTRE
SOMERS TOWN COMMUNITY CENTRE
SOUTH END CLOSE TENANTS AND RESIDENTS ASSOCIATION
SOUTH END GREEN ASSOCIATION
SOUTH HAMPSTEAD HIGH SCHOOL
SOUTH HILL PARK WATCH FOR SAFER NEIGHBOURHOODS
SOUTH KENTISH TOWN CONSERVATION AREA ADVISORY COMMITTEE
SPORT ENGLAND
SPRINGBOARD LONDON AND SOUTH EAST
STEWART ROSS ASSOCIATES
SUMMERS STREET RESIDENTS ASSOCIATION
SWAINS LANE RESIDENTS AND

NEIGHBOURHOOD WATCH ASSOCIATION
SWISS COTTAGE COMMUNITY CENTRE
TAVISTOCK MANSIONS LEASEHOLDERS AND RESIDENTS ASSOCIATION
TEMPLEWOOD AVENUE NEIGHBOURHOOD ASSOCIATION
TERRENCE HIGGINS TRUST
TETLOW KING PLANNING
THAMES WATER PROPERTY SERVICES
THE COAL AUTHORITY
THE HOLBORN BUSINESS PARTNERSHIP
THE HUB
THE OFFICE GROUP
THE THEATRES TRUST
THEATRO TECHNIS
THIRD AGE PROJECT
THURLOW ROAD NEIGHBOURHOOD ASSOCIATION
TIN PAN ALLEY TRADERS ASSOCIATION
TP BENNETT PLANNING
TRAINING LINK
TRANSPORT FOR LONDON - CAMDEN & ISLINGTON
TRANSPORT FOR LONDON - LAND USE PLANNING
TRANSPORT FOR LONDON - TUBE
TRAVELWATCH
TRIBAL MJP
TURLEY ASSOCIATES
UNIVERSITY COLLEGE LONDON
VALE OF HEALTH SOCIETY
VOLUNTARY ACTION CAMDEN
W HEART
WARREN COURT RESIDENTS ASSOCIATION AND FITZROVIA PARTNERSHIP LIMITED
WATKIN JONES
WEDDERBURN ROAD RESIDENTS ASSOCIATION
WEST HAMPSTEAD AMENITY AND TRANSPORT
WEST HAMPSTEAD COMMUNITY CENTRE

WEST HAMPSTEAD LOCAL CONSULTATION GROUP
WEST HAMPSTEAD WOMENS CENTRE
WEST HEATH LAWN TENNIS CLUB
WESTBERE COPSE ASSOCIATION
WESTCROFT ESTATE TENANTS AND RESIDENTS ASSOCIATION
WESTFIELD MANAGEMENT COMPANY
WEST-KING
WESTMINSTER KINGSWAY
WHOSE?
WINCHESTER ROAD RESIDENTS ASSOCIATION
WOBURN WALK RESIDENTS AND TRADERS ASSOCIATION
WORKING MENS COLLEGE
WORKSPACE GROUP PLC
ZOOLOGICAL SOCIETY OF LONDON
Letters sent
25/27 FARRINGDON ROAD RESIDENTS' ASSOCIATION
8 NEWTON STREET RESIDENTS ASSOCIATION
87 HATTON GARDEN RIGHT TO MANAGE COMPANY LIMITED
AFRICAN AND CARIBBEAN ELDERS
AGE CONCERN CAMDEN
ALLIANCE PLANNING
ALSOP VERRILL
AMPTHILL SQUARE TENANTS ASSOCIATION
ANTRIM MANSIONS RESIDENTS ASSOCIATIONS
ARKWRIGHT MANSIONS LEASEHOLDERS ASSOCIATION
ARLINGTON ROAD SOUTH RESIDENTS
ARTISAN DWELLINGS TENANTS ASSOCIATION
AUDEN PLACE TENANTS ASSOCIATION
BAA SAFEGUARDING TEAM
BAM RESIDENTS ASSOCIATION
BARTHOLOMEW ESTATE AND KENTISH TOWN CONSERVATION AREA ADVISORY COMMITTEE
BARTON WILLMORE PLANNING
BEAUMONT WALK TENANTS AND RESIDENTS ASSOCIATION

BELL CORNWELL
BELSIZE AVENUE (41-43) TENANTS AND
RESIDENTS ASSOCIATION
BELSIZE CAAC
BELSIZE GROVE (8) LEASEHOLDERS
ASSOCIATION
BENGALI PARENT AND TENANTS ASSOCIATION
BLASHFORD TENANTS AND RESIDENTS
ASSOCIATION
BLOOMSBURY CAAC
BONNY STREET RESIDENTS ASSOCIATION
BOSCASTLE RESIDENTS ASSOCIATION
BOSWELL HOUSE LEASEHOLDERS
ASSOCIATION
BOURNE ESTATE TENANTS ASSOCIATION
BRACKNELL GARDENS RESIDENTS
ASSOCIATION
BRANCH HILL ALLOTMENTS ASSN.
BRAY TENANTS AND LEASEHOLDERS
ASSOCIATION
BRIDGE HOUSE LEASEHOLDERS ASSOCIATION
BROOK EUSTON
BROOKFIELD PARK RESIDENTS ASSOCIATION
BROOKFIELD TENANTS AND LEASEHOLDERS
ASSOCIATION
BRUNSWICK LEASEHOLDERS ASSOCIATION
BURNHAM RESIDENTS ASSOCIATION
BURY PLACE RESIDENTS ASSOCIATION
BUTA LIMITED
C.R.A.S.H
CAMDEN AND KENTISH TOWN DISTRICT
MANAGEMENT COMMITTEE
CAMDEN CAB
CAMDEN CENTRAL COMMUNITY UMBRELLA
CAMDEN CHINESE COMMUNITY NURSERY
CAMDEN CONNEXIONS CENTRE
CAMDEN LOCK (LONDON) LTD
CAMDEN PARK RESIDENTS ASSOCIATION
LIMITED
CAMDEN SOCIETY
CAMDEN SQUARE AREA TENANTS AND

RESIDENTS ASSOCIATION
CAMDEN SQUARE NEIGHBOURHOOD
ASSOCIATION
CAMDEN TOWN CAAC
CAMDEN TOWN NEIGHBOURHOOD ADVICE
CENTRE
CAMDEN TOWN SPEAKS RESIDENTS
ASSOCIATION
CAMDEN TRIBUNAL UNIT
CANCER RESEARCH UK
CARE ALLIANCE REFUGEE COMMUNITY
CAROL STREET 2000 TENANTS ASSOCIATION
CASTLE ROAD ESTATES TENANTS
ASSOCIATION
CASTLE ROAD RESIDENTS ASSOCIATION
CAYFORD HOUSE TENANTS AND RESIDENTS
ASSOCIATION
CHALCOT CRESCENT & ROTHWELL STREET RA
CHAMBERLAIN STREET ASSOCIATION
CHARLOTTE STREET ASSOCIATION
CHARLTON KINGS TENANTS ASSOCIATION
CHENIES STREET CHAMBERS TENANTS AND
RESIDENTS ASSOCIATION
CHESTER TERRACE RESIDENTS ASSOCIATION
CHINESE INFORMATION AND ADVICE CENTRE
CHOLMLEY GARDENS LIMITED
CHURCH ROW ASSOCIATION
CITY BUSINESS LIBRARY
CITY LIT LEARNING INSTITUTE
CITY OF WESTMINSTER
CIVIL AVIATION AUTHORITY
CLARENCE WAY ESTATE AND CASTLE ROAD
TENANTS AND RESIDENTS ASSOCIATION
CLUTTONS LLP
COCKPIT ARTS
COLLARD PLACE AND PART HARMOOD STREET
RESIDENTS ASSOCIATION
COLLEGE PLACE LEASEHOLDERS
ASSOCIATION
COLLEGE PLACE TENANTS AND RESIDENTS
ASSOCIATION

COOPERS LANE TENANTS AND RESIDENTS
ASSOCIATION
COVENT GARDEN BUSINESS FORUM
CRANLEIGH HOUSE TENANTS AND RESIDENTS
ASSOCIATION
CRANLEY BUILDINGS RESIDENTS
ASSOCIATION
CRESTA HOUSE RESIDENTS ASSOCIATION
CROFTDOWN ROAD (124) RECOGNISED
TENANTS ASSOCIATION
CROWN RESIDENTS ASSOCIATION
DALTON WARNER DAVIS
DARTMOUTH PARK CONSERVATION AREA
ADVISORY COMMITTEE
DELANCEY STREET RESIDENTS ASSOCIATION
DELANCEY STUDIOS TENANTS AND
RESIDENTS ASSOCIATION
DENTON TENANTS AND RESIDENTS
ASSOCIATION
DERBY LODGE TENANTS AND RESIDENTS
ASSOCIATION
DICK COLLINS HALL
DORNEY TENANTS AND RESIDENTS
ASSOCIATION
DOWNING COURT RESIDENTS ASSOCIATION
DOWNSHIRE HILL ASSOCIATION
DOWNSHIRE HILL RESIDENTS ASSOCIATION
DRILL HALL
DRIVERS JONAS (CLIENT: BRITISH LIBRARY)
DUDLEY COURT TENANTS ASSOCIATION
DUNBOYNE ROAD TENANTS ASSOCIATION
DURDANS HOUSE TENANTS AND RESIDENTS
ASSOCIATION
ELAINE COURT (MANAGEMENT) LIMITED
ELAINE GROVE AND OAK VILLAGE RESIDENTS
ASSOCIATION
ELSWORTHY CAAC
ELSWORTHY COURT MEMBERS COMPANY
LIMITED
ELSWORTHY RESIDENTS ASSOCIATION
ETON CONSERVATION AREA ADVISORY
COMMITTEE

ETON VILLAS CAAC
EVANGELIST ROAD RESIDENTS ASSOCIATION
FAIRFAX PLACE RESIDENTS ASSOCIATION
FAIRFAX ROAD (12-36) RESIDENTS
ASSOCIATION
FITZJOHNS/NETHERHALL CAAC
FITZROVIA NEIGHBOURHOOD ASSOC
FLAXMAN COURT TENANTS AND RESIDENTS
ASSOCIATION
FLEET COMMUNITY CENTRE
ADVICE AND INFORMATION UNIT MANAGER
FRIENDS, FAMILIES AND TRAVELLERS
FRIENDS OF HAMSPTEAD HEATH
FRIENDS OF HIGHGATE CEMETERY
FRIENDS OF RUSSELL SQUARE
FROGNAL ESTATE RESIDENTS ASSOCIATION
FROGNAL LANE AND GREENAWAY GARDENS
RESIDENTS ASSOCIATION
FROGNAL LANE RA
FROGNAL WAY RESIDENTS ASSOCIATION
GAMAGES TENANTS AND RESIDENTS
ASSOCIATION
GARNETT HOUSE TENANTS AND
LEASEHOLDERS ASSOCIATION
GEORGIANA LEASEHOLDERS ASSOCIATION
GMW ARCHITECTS
GOLDINGTON STREET ESTATE TENANTS AND
RESIDENTS ASSOCIATION
GONDAR AND AGAMEMNON RESIDENTS'
ASSOCIATION (GARA)
GORDON MANSIONS RESIDENTS ASSOCIATION
GOSPEL OAK (7 AND 8) TENANTS AND
RESIDENTS ASSOCIATION
GREENWOOD TENANTS ASSOCIATION
GROVE TERRACE ASSOCIATION
GVA GRIMLEY
GVA GRIMLEY LTD (CLIENT: JOHN FITZSIMONS
ESQ.)
THE GYPSY COUNCIL
HAMPSTEAD CONCERN RESIDENTS GROUP
HANWAY PLACE RESIDENTS ASSOCIATION

HARBEN LEASEHOLDERS ASSOCIATION
HARMOOD HARTLAND AND CLARENCE
RESIDENTS ASSOCIATION
HARRY NEAL
HARVARD COURT RESIDENTS ASSOCIATION
HATTON GARDEN BUSINESS FORUM C/O
WONDERBERRY
HAVERCOURT RESIDENTS ASSOCIATION
LIMITED
HAVERSTOCK HILL CIRCLE RESIDENTS
ASSOCIATION
HEALTH AND SAFETY EXECUTIVE
HEATH & HAMPSTEAD SOCIETY
HEATH & HAMPSTEAD SOCIETY
HEPHER DIXON LTD (CLIENT: SOUTHBURY
DEVELOPMENTS)
HIGHGATE ROAD RESIDENTS GROUP
HIGHWAYS AGENCY
HILGROVE ESTATE RESIDENTS ASSOCIATION
HILLFIELD AND ALDRED ROADS RESIDENTS
ASSOCIATION
HILLFIELD COURT LIMITED
HOLLY LODGE CAAC
HOLLY LODGE ESTATE CONSERVATION AREA
ADVISORY COMMITTEE
HOLLY LODGE RESIDENTS ASSOCIATION
HOLTS
HOLY CROSS CENTRE
HOME BUILDERS FEDERATION
HOMES AND COMMUNITY AGENCY
HOME-START CAMDEN
HOPSCOTCH
HOUSING CORPORATION
INGESTRE COMMUNITY CENTRE
INGESTRE ROAD LEASEHOLDERS
ASSOCIATION
INGESTRE ROAD TENANTS ASSOCIATION
IRISH TRAVELLER MOVEMENT IN BRITAIN
JAMES WIGG GROUP PRACTICE
JEFFREY'S STREET CAAC AND ROCHESTER
CAAC

JOHN LAING PROJECTS AND DEVELOPMENT
JUDD STREET RESIDENTS ASSOCIATION
KELLY STREET RESIDENTS ASSOCIATION
KENBROOK TENANTS AND RESIDENTS
ASSOCIATION
KENNISTOUNE AND WILLINGHAM CLOSE
TENANTS AND RESIDENTS ASSOCIATION
KENTISH TOWN CAAC
KENTISH TOWN ROAD ACTION
KILBURN VALE ESTATE TENANTS AND
RESIDENTS ASSOCIATION
KILN PLACE TENANTS ASSOCIATION
KING'S CROSS BUSINESS FORUM
KINGS CROSS CAAC
KINGS CROSS CONSERVATION AREA
ADVISORY COMMITTEE
KINGS CROSS PRIMARY CARE CENTRE
KINGSGATE COMMUNITY CENTRE
LADY MARGARET ROAD RESIDENTS
ASSOCIATION
LAMBLE STREET AND BARRINGTON CLOSE
LEASEHOLDERS ASSOCIATION
LANGDON HOUSE TENANTS AND RESIDENTS
ASSOCIATION
LANGLEY-TAYLOR
LAURIER ROAD RESIDENTS ASSOCIATION
LB ISLINGTON
LEARNING AND SKILLS COUNCIL
LEIGHTON ROAD NEIGHBOURHOOD
ASSOCIATION
LEWIS NEDAS AND CO.
LEYSDOWN SHIPTON AND STONEGATE
TENANTS AND RESIDENTS ASSOCIATION
LINDFIELD AND LANGLAND GARDENS
NEIGHBOURHOOD ASSOCIATION
LINDSAY HOUSE RESIDENTS ASSOCIATION
LISSENDEN GARDENS TENANTS ASSOCIATION
LONDON DEVELOPMENT AGENCY
LONDON FORUM OF AMENITY AND CIVIC
SOCIETIES
LONDON MAMMAL GROUP

LONDON PLANNING PRACTICE (CLIENT:
MARYLEBONE PROPERTY COMPANY LTD)
LONDON SWIMMING
LONDON GYPSY & TRAVELLER UNIT
LUDHAM AND WAXHAM TENANTS AND
RESIDENTS ASSOCIATION
LYMINGTON ROAD RESIDENTS ASSOCIATION
MAIDEN LANE LEASEHOLDERS AND
FREEHOLDERS ASSOCIATION
MAIDEN LANE TENANTS ASSOCIATION
MAITLAND PARK TENANTS AND RESIDENTS
ASSOCIATION
MANSFIELD CAAC
MANSFIELD ROAD TENANTS AND RESIDENTS
ASSOCIATION
MARCHMONT ST ASSOCIATION
MARGARET PYKE CENTRE
MAYFORD TENANTS AND RESIDENTS
ASSOCIATION
MECKLENBURGH RESIDENTS ASSOCIATION
MEDICAL FOUNDATION FOR THE CARE
MENELIK AREA RESIDENTS ASSOCIATION
MERU CLOSE MANAGEMENT LIMITED
METRO FREEHOLD LIMITED
MILL COURT HAMPSTEAD LIMITED
MILLFIELD LANE RESIDENTS ASSOCIATION
MILLMAN STREET TENANTS AND RESIDENTS
ASSOCIATION
MOBILE OPERATORS ASSOCIATION
MONICA SHAW COURT TENANTS & RESIDENTS
ASSOC
MORNINGTON AREA ACTION GROUP
MORNINGTON CRESCENT RESIDENTS
ASSOCIATION
MORTIMER CRESCENT TENANTS AND
RESIDENTS ASSOCIATION
MORTIMER TERRACE NATURE RESERVE
NATIONAL AIR TRAFFIC SERVICE
THE NATIONAL FEDERATION OF GYPSY
LIAISON GROUPS
NATIONAL TRAVELLERS ACTION GROUP

NETHERHALL NEIGHBOURHOOD ASSOCIATION
NETWORK RAIL
NEW CALTHORPE ESTATE TENANTS AND
RESIDENTS ASSOCIATION
NEW COMPTON STREET ASSOCIATES
NHS LONDON
NORTH END RESIDENTS ASSOCIATION
NOTTING HILL HOUSING TRUST
OAKHILL AVENUE RESIDENTS ASSOCIATION
OFE BROADHURST GARDENS TENANTS AND
RESIDENTS ASSOCIATION
OLD BROOKFIELD ESTATE RESIDENTS
ASSOCIATION
ONE REDINGTON GARDENS MANAGEMENT
LIMITED
OSBORNES
OUTDOOR ADVERTISING ASSOCIATION
PARKHILL CAAC
PARKSIDE COURT LEASEHOLDERS
ASSOCIATION
PARKWAY RESIDENTS ASSOCIATION
PARSIFAL ROAD ASSOCIATION
PECKWATER ESTATE TENANTS ASSOCIATION
PHOENIX COURT COMMUNITY RECOGNISED
TENANTS ASSOCIATION
PHOENIX GARDENS
PLACES FOR PEOPLE GROUP
PLANNING AND GENERAL SERVICES
PRIMROSE GARDENS COMMUNITY
ASSOCIATION
PRIMROSE HILL COURT TENANTS AND
RESIDENTS ASSOCIATION
PRINCE ALBERT ROAD (17-22) RESIDENTS
ASSOCIATION
QUEEN COURT RESIDENTS AND
LEASEHOLDERS ASSOCIATION
QUICKSWOOD RESIDENTS ASSOCIATION
RED LION SQUARE TENANTS ASSOC
REDINGTON/FROGNALL CAAC
REGENT SQUARE RESIDENTS ASSOCIATION
REGENTS NETWORK

REGENT'S PARK CAAC
REGENTS PARK TENANTS AND RESIDENTS
ASSOCIATION
REGENTS PARK TENANTS ASSOCIATION
RELATIVES AND RESIDENTS ASSOCIATION
RIDGMOUNT GARDENS RESIDENTS
ASSOCIATION
ROCHESTER GARDENS ASSOCIATION
RONDU HOUSE TENANTS AND RESIDENTS
ASSOCIATION
ROSEMONT ASSOCIATION
ROUSDEN STREET RESIDENTS ASSOCIATION
RPS PLANNING (CLIENT: BARRATT HOMES LTD)
RPS PLANNING (CLIENT: FAIRVIEW NEW
HOMES LTD)
RUDALL CRESCENT RESIDENTS ASSOCIATION
RUGBY AND HARPUR RESIDENTS
ASSOCIATION
RUSSELL COURT RESIDENTS ASSOCIATION
RUSSELL JONES AND WALKER
SAINT ALBANS VILLAS AND OAK COURT
TENANTS AND RESIDENTS ASSOCIATION
SAINT CRISPINS CLOSE FIRST HARBINGER
RESIDENTS ASSOCIATION
SAINT CRISPINS CLOSE SECOND HARBINGER
RESIDENTS ASSOCIATION
SAINT JOHNS COURT RESIDENTS COMMITTEE
SAINT LEONARDS SQUARE TENANTS AND
RESIDENTS ASSOCIATION
SAINT PANCRAS WAY ESTATE TENANTS AND
RESIDENTS ASSOCIATION
SAINT SILAS TENANTS AND RESIDENTS
ASSOCIATION
SIDINGS TENANTS AND RESIDENTS
ASSOCIATION
SIDMOUTH MEWS TENANTS ASSOCIATION
SIDNEY BOYD COURT TENANTS ASSOCIATION
SOMERS TOWN PEOPLES FORUM
SOUTH END GREEN ASSOCIATION /
HAMPSTEAD CAAC
SPEDAN CLOSE LEASEHOLDERS ASSOCIATION
SPEDAN CLOSE TENANTS AND RESIDENTS

ASSOCIATION
SPH HOUSING TENANTS ASSOCIATION
SPRINGBOARD UK LTD
STANBURY COURT MANAGEMENT LIMITED
STEDHAM CHAMBERS LEASEHOLDERS
ASSOCIATION
SURE START KILBURN PRIORY
SWISS COTTAGE ACTION GROUP
TAPLOW TENANTS AND RESIDENTS
ASSOCIATION
TAVISTOCK CHAMBERS RESIDENTS
ASSOCIATION
TESCO STORES LTD
THAMES WATER PROPERTY SERVICES
THE GARDEN HISTORY SOCIETY
THE SCHOOL OF PHARMACY
THEATRO TECHNIS
TIPTREE BARLING AND HAVERING TENANTS
AND RESIDENTS ASSOCIATION
TONBRIDGE HOUSE TENANTS AND RESIDENTS
ASSOCIATION
TORRIANO COTTAGES ASSOCIATION
TORRIANO ESTATE TENANTS AND
LEASEHOLDERS ASSOCIATION
TRANSCO PLC
TRANSPORT FOR LONDON
THE TRAVELLER LAW REFORM PROJECT
TRINITY COURT RESIDENTS ASSOCIATION
(LEASEHOLDERS GROUP)
TYBALDS CLOSE TENANTS ASSOCIATION
UNA HOUSE TENANT AND RESIDENT
ASSOCIATION
UNION OF MUSLIM FAMILIES (UK)
UNION RAILWAYS (NORTH)
UNIVERSITY COLLEGE LONDON
VALE OF HEALTH SOCIETY
VANE CLOSE RESIDENTS ASSOCIATION
VICARS ROAD RESIDENTS ASSOCIATION
WATERLOW PARK ACTION GROUP
WATERSIDE PLACE RESIDENTS ASSOCIATION
WEBHEATH TENANTS ASSOCIATION

WENDLING TENANTS AND RESIDENTS
ASSOCIATION
WEST END GREEN CAAC
WEST HAMPSTEAD SMALL TRADERS AND
RESIDENTS ASSOC
WHAT
WHITE COURT RESIDENTS ASSOCIATION
LIMITED
WHITTINGTON ESTATE RESIDENTS
ASSOCIATION
WINDMILL HILL AREA RESIDENTS ASSOCIATION
WINSTON TENANTS ASSOCIATION
WITLEY COURT RESIDENTS ASSOCIATION
WOMEN LIKE US
WORDSWORTH PLACE RESIDENTS
ASSOCIATION