



Consultation Statement

APPENDIX 15 Comments 52 – 89

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 10 APRIL – 17 APRIL 2015

Comment and Number	Date	Email or Box	Name and Address	Relevant Policies, Action Taken	Reason for Non-Action
52. Congratulations on a well presented, well researched document. In general I support your aims but I do not want to see the carwash developed. It provides a valued amenity and could be improved visually without undue cost. Also: if I were a councillor I would appreciate some idea of your priorities either in terms of what is the most important or what is the most feasible.	10/04/15-13/04/15	Library Box	Richard Lansdown	SSP3 Car Wash Site: The reason this policy is included in the Plan is that the owner of the site wants to develop it for mixed use. It is his right to do so when applying. After discussions with him we have written a policy that encourages use of the site in keeping with the surrounding area.	Priorities: There are no specific priorities in the Plan because it all depends on when a developer comes forward. KTNF will be looking at the development of SSP1 Town Square as soon as possible.
53. Dear North Camden Neighbourhood Foru, Nancy Mayo of Redington and Frgnial Community Group and I of Hampstead Neighbourhood Forum would like to arrange a meeting with the Tree Officers at Camden to discuss the Camden Local Plan, the re-writing of our local Conservation Area statements and our own Local Plans. We think it would be useful to talk through how our local plans can help support the Tree Officers in protecting important trees and green corridors in our areas; supporting their case when for example planning applications refused by Camden go to appeal, or when section 106s are formulated. We'd like discuss with them what is important to us in regards to trees in private gardens which support a lot of the biodiversity in north London, the threats to them that we see, and how we can all work together on increasing canopy cover - as in the London Plan. The Tree Officers are very happy to meet with us, and it seems sensible for us to meet together. I have suggested that we meet towards the end of the day to make it easier for those who are working, and that we'd like to meet up sooner rather than later. I apologise for not knowing the contact details of your committee members who are responsible for biodiversity/trees/green spaces, and would be really grateful if you could pass this email on to the person/people whom you think most appropriate with regards to trees. We can then see which day is most suitable for those who would like to attend, and perhaps prepare the agenda together beforehand. Those who have already written their local plans and had contact with inspectors can also be of help to those of us who are a bit further behind.	10/04/15	Email	Vicki Harding	GO3 Thanked 14.04.15	Trees: Invitation not taken up because the proposals, although good, go beyond the scope of the Plan.

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54. I am generally in support of the policies in the draft plan, particularly those that aim to improve access and safety for cyclists and pedestrians. I also agree with the suggested improvements to the area adjoining KT tube station and to the preservation of the view of the Heath from the canopy. However I would raise the following points for consideration. 1. In view of the fact that "affordable" rents as currently defined are not in fact possible for many low paid workers to afford, the plan should aim to retain existing lower cost housing (such as that currently provided by the Council and most housing associations) and encourage the development of lower cost housing, for example via self-build schemes, or any other means possible. 2. Has the option of a community land trust been explored? This would provide lower cost options and the future increase in land value would be retained for the public good. See link for information. 3. The plan should ensure that the redevelopment of 2 Prince of Wales Road is accompanied by replacement accommodation for the CAB and Camden Law Centre. These are important local services and need to be in a convenient location close to public transport (though not necessarily at the same location as at present). 4. Whilst shop fronts covered in posters may be less attractive than others, I don't consider the ones in Kentish Town Road to be "unfriendly and discouraging" as the plan does. The policy described as a CIL priority would appear to discriminate against the cheaper shops that are an important resource to lower income residents and could lead to a further decline in the diversity and extent of the shopping area.	10/04/15	Email	Mary Goyder	D1; GA; SSP1; SSP2; Housing; SSP7; Shopping & Working Project Thanked 14/04/15 Support noted for D1; GA; SSP1; SSP2 cycling. Housing: The Plan mentions affordable housing throughout. The Plan Glossary states: "Affordable Housing: Social-affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Affordable housing does not include low cost market housing." Camden Council's requirement in a major development (50 homes or more) is for 50% affordable housing, of which 60% is social-affordable rented housing and 40% intermediate housing. Therefore, whenever the Plan supports affordable housing, it is supporting social-rented housing as well. SSP7: As a result of this consultation, alternative accommodation for CAB, CLC and Voluntary Action Camden has been added to the policy.	A Community Land Trust has been considered but is a different initiative to the Plan. It is something that could be set up by another group in the future. Shopping & Working Project: the Project text does not discriminate or threaten cheaper shops (and it's not only 'cheaper' shops that need to be improved). It will help shops to improve their frontage with CIL funds – therefore the customer footfall should improve.

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55. [continued on next three pages] We are the only current residents actually living on Wolsey Mews, as opposed to in buildings with access from Wolsey Mews, and have yet to have met anyone in relation to this consultation – however we are very excited about all of the plans relating to the changes in Kentish Town and supportive of all of them. That being said we would like to suggest some changes to the plans for Wolsey Mews. Kentish Town could certainly use an overflow from the main high street, and we would welcome more business use, retail, restaurant or other on North or South Wolsey Mews, or residences. We also think that adjusting the contra-flow to the one-way system to allow of bicycles was a very good idea - although we have been disturbed to witness a number of accidents with cars coming the other way including one incredibly bad one, on exiting Wolsey Mews and turning onto the high street. We watch every day the many children and young families who use Wolsey Mews to walk up to Kentish Town Primary. We watch every evening the many inebriated people leaving the Oxford to come south via Wolsey Mews from the benches outside (we have no problem with this - they can be a nuisance but its their pleasure to go the pub and we wouldn't change it) We watch many many drivers go down Wolsey Mews at high speeds to avoid jams on the high street or who are frustrated they can't access the high street via Islip street – even the police often use it to get off the high street. In particular lorries use the street with a very high frequency. This presents a significant issue at the Islip street end of Wolsey Mews where - people using the vegetable stall, - people approaching the school - people leaving the school - people leaving the pub - people running to the underground (every morning) meet - cars coming down Islip street & cars coming off the high street	11/04/15	Email	Alfred Chubb & Fiona Deans	Thanked 14/04/15 SSP6: Following this consultation, pedestrianisation of Wolsey Mews was considered but was not seen as feasible because of the increased traffic that would be rerouted onto Kentish Town Road, including cycles. However, the widening and improvements of pavements in Wolsey Mews has been added to the Policy. Cycle lanes and more traffic lights in Kentish Town Road would not be viable. Traffic is already snarled up and cycle lanes and more traffic lights would slow it down even more. The addition of trees is already included in the Policy.	N/A

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morning) meet - cars coming down Islip street & cars coming off the high street It's pretty horrendously dangerous: However there's a really simple solution (which is pretty bad for us as we wouldn't have access to our house) - Pedestrianise Wolsey Mews - North and South - keep access onto Islip from the high street - divert Islip southbound traffic onto Hammond Street and they would then turn right onto Gaisford to get back on the high street There IS still a pub on Gaisford/Hammond in the Lion and the Unicorn – but the general public drinking outside have an area to sit in enclosed by hedges and there's a very significant pavement space between the exit of that area and the road, plus most of them turning right to the high road would go down pavement and then cross a then pedestrianised Wolsey Mews to the high road. If the pedestrianisation of the road doesn't make sense for KTNF - and I hope you at least give it some consideration now that there are at least three new residents opening up on the street - please at least consider widening and correcting the pavement. Since the road has been asphalted the traffic rate has increased but there is only one pavement and it has several gaps which make it impossible to run even one push-chair or wheel chair down. Design guidance would now suggest that • Footways in new developments are designed to minimum width standards of 2000mm to include the diverse needs of users; • Clear design information is provided on the positioning of permanent obstacles such that minimum widths of footways are maintained;	11/04/15	Email	Alfred Chubb & Fiona Deans		

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• Personal safety of pedestrians is prioritized such that temporary obstacles on footways are discouraged. The women's centre has wheel chair access as does the red windowed building on the corner and both have lifts capable of taking wheelchairs to the first floor - but no wheelchairs can approach either building in safety. Equally now that there are children under the ages of 3 living on Wolsey Mews and with the aforementioned school children walking or scooting - especially with lorries riding the pavement (which only goes down one side of the street anyway and therefore cannot accommodate pedestrian traffic in both directions (currently someone will step into the street) it's a bit of a mess. http://assets.highways.gov.uk/specialist-information/guidance-and-best-practice-dda-compliance-highways_agency_dda_compliance_programme_-_Design_Compliance_Assessment_Guide_DDA_Training_Spring_2010.pdf Finally since we have lived here we have stopped two burglaries at No. 26 and failed to stop one (at no. 17), we have witnessed people defecating and urinating in Wolsey Mews and we have seen groups of secondary school kids playing dice and once setting rubbish on fire. There's a high degree of fly tipping and in part that's due to the fact that the rubbish collection is infrequent - probably three weeks in four - that's not your responsibility and we've taken it up with Veolia. However what it does mean is that the general sense of the road is that it is a neglected rubbish strewn alley. The council for instance have left quite a degree of building materials scattered next to the disused garages which now block the pavement and are too heavy to move. The directive to transform the use of Wolsey Mews is precisely supposed to improve this – however I'm	11/04/15	Email	Alfred Chubb & Fiona Deans		

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not sure that without some trees and an improved pavement and/or change of use (bicycle traffic only) - i don't think that this behaviour will change which isn't really going to help engage new businesses to move into the road. I hope some of this is helpful and doesn't sound hysterical – as the only person fully on the street in question day and night i'm pretty much the only witness who can make comment. I love Wolsey Mews and I love what you want to do to it. I welcomed and supported the changes of use to the garages and I've tried to work with the women's centre to help them accommodate the new architects. Both my wife and I have started and run successful technology and media businesses from start-up to full growth and we know what we'd expect in either of those cases. We'd love to encourage more start-up / tech businesses on this road. 56. [On the next three pages are scanned copies of a letter sent by Historic England – Statutory body.] Dear Caroline Thank you for your consultation on the Kentish Town Neighbourhood Plan and please see the attached letter for our comments. Kind Regards Melanie	11/04/15	Email	Alfred Chubb & Fiona Deans	Support for Policies D1, SW2 and SW3 noted. D3: use of materials has been clarified in the Plan, following this Consultation. Design Guidance – there is design guidance in this policy and it includes local character in the policy requirements. Following this Consultation the policy includes the following lines: "Given the significance of this policy, a Design Review is required to be undertaken on major schemes to help to develop exceptional design quality."	D4: Camden's Local List was adopted in January 2015. It will not be updated for some years. KTNF wanted the eight buildings in this policy to have the same amount of protection and recognition as those on the Local List. It would be too risky to wait until the next Local List update. If this Policy became a Project (presumably that is what is meant by "an action point") it would not have the same force as a Policy. Map: A map showing all buildings of merit and designated heritage assets proved to be too complex.
	13/04/15	Letter	Melanie Millward Archaeology & Historic Places National Planning & Conservation Historic England London Planning		



Historic England

Miss Caroline Hill
Chair Kentish Town Neighbourhood Forum
13 Leverton Street
London
NW5 2PH

Our ref: HD/P5008/21

Your ref:

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13 April 2015

Dear Caroline

re: Draft Kentish Town Neighbourhood Plan and SEA

Thank you for your recent email to English Heritage inviting comments in respect of the submitted Kentish Town Neighbourhood Plan.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require English Heritage, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As English Heritage's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed your document against the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.

We do not wish to comment in great detail but can offer the following observations and suggestions for consideration in respect of clarifying compliance with the NPPF and local policy and developing a robust neighbourhood plan.

General Comments

We are pleased to note the emphasis on heritage within the plan, particularly through Core Objectives 1 and 2 and their supporting policies, and the identification of a local policy for the protection of the view to Parliament Hill.



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We note the concerns in respect of supporting the retail core of the High Street and support the intention to promote improvements to street frontages and local character and distinctiveness. Overall the Plan appears clear and comprehensive we do however have some observations and suggestions you may wish to consider.

Generally you might wish to consider some minor alteration to the layout as certain policies, for example SSP9 Small Sites and Infill Development (page 47) may have wider application than simply those specific sites identified. Also within the Shopping and Working Project (page 49) sections a and b are written as design policies and might be more appropriately identified as policies.

Page 17; although much of the plan area is not within a conservation area, the principal retail core of Kentish Town Road has considerable local character and a good collection of late Victorian and Edwardian shopping parades. Although requiring signage and shopfront improvements these provide a strong sense of enclosure of the main shopping street. As such we would suggest the Neighbourhood Forum work with the Council to assess and potentially include the proposed non-designated heritage assets to the local list and to analyse those elements which positively contribute to local character. You may wish to consider, in developing design guidance to consider this in respect of predominant form and massing, for example the need to reinforce the linear nature of the High Street, or scale of historic residential areas within the Plan area, and to consider how the rear of the retail streets relate to the wider area (possibly linked to Policy SSP9).

We would suggest that where policies indicate a need for proposed developments to be 'in keeping with the surrounding area' that local/historic character is included alongside scale and massing, particularly within the Site Specific Policies. Local character should also be reflected and enhanced in the choice of materials for public realm works.

The Plans policies are supported by Camden Councils existing policies and it may be helpful to include links to SPD's and relevant policies as an appendix.

We note the inclusion of a map of conservation areas and the proposed buildings of architectural merit (page 21). It would be helpful to include a more comprehensive map which encompasses existing buildings of merit, and designated heritage assets. This would assist in considering setting issues in relation to Site Specific Policies.

On the 1st April 2015 English Heritage will have split into two organisations with Historic England undertaking statutory activities relating to heritage (i.e. Listed Buildings, consultations on Neighbourhood Plans), as such and to avoid confusion we would recommend that all references within the document to English Heritage are changed to Historic England.

Policy Specific Comments

Policy D3 d, page 18 – The example within this sub section states that 'London Stock brick, if used must be of a precise match'; however it is not clear what the brick should be matching too. We assume that this policy seeks to discourage a default material choice of



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“stock brick”, and to ensure development is contextual and materials reflect the immediate built context, and support local character. However, this requires clarification or relocating the example within the Policy text. It may be more appropriate to consider inclusion of an additional design guidance section or the creation of a clear link between this policy and the relevant design guide SPD by Camden Council.

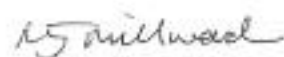
Policy D4, page 20 – This policy states that eight buildings and features were omitted from the Camden Local List. We are pleased to note the Neighbourhood Plans intention to protect important buildings and structures of local character. However, we wonder if this might not be better dealt with as an action point rather than a policy to ensure that Neighbourhood Plan “policies” remain relevant in the event of additions to the list or partial adoption as locally listed buildings.

Conclusion

Our comments are intended to encourage a more beneficial Plan and we would hope that you find the comments and observations useful. We would of course be happy to provide further advice in respect of any of the above, or other, issues, if this is helpful.

Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Guidance, Appraisals and Management Plans, and which may have adverse effects on the environment.

Yours sincerely



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57. I live at 257a KT Rd. and have been made aware of proposed plans for next door; ground floor / basement will remain retail unit, with 2x 1bed flats on 1st floor, 2x 1bed flats on 2nd floor and a new 3rd floor providing a 3x bed flat. In order to achieve this they will extend the building back and add a new 3rd floor. I feel this will spoil such a beautiful building and all for the benefit of the freeholders GMS estates, who also converted the old Gingerbread offices (at 255 KT Rd) into 4x 1beds and 2x 2beds. The plans can be seen on the Camden planning page: Application Number2015/1286/P Site Address259 - 263 Kentish Town Road London NW5 2JT Application TypeFull Planning Permission Development TypeNew Mixed Redevelopment If you have the time to make any comments, this would be appreciated, today is the last day! Sorry for the short notice, I just found out from a neighbour in Crown Place.	15/04/15	Email	Jo Reuben	Thanked and reason for non-action given 16/04/15	KTNF doesn't get involved with minor planning applications. This is a matter for KTRA and that group decided not to object to the application.
58. Re The Leighton Arms We have been residents of Kentish Town for 35 years and am in full agreement with most of your points in the draft plan. We in Torriono Avenue and the top end of Leighton Ave have been battling plans to save our local, the Leighton, being decimated. Yes, yet another local pub bought by developers to make as much money as possible. They shut the pub garden and put their treatle tables and smokers out onto the street hoping to build 2 luxury houses in the pub garden and put 5 residential flats above the pub. We have been successful in having planning permission turned down (40 people against none for) but are well aware they will be back. We would very much like to have our neighbour pub included as an asset of a community value which may give it some protection. Could it be included in the list of pubs you have drawn up? Or could you give us some advice? We would be happy to meet up with you to discuss the issues.	16/04/15	Email	Ross and Ann Fairley	Thanked. 16/04/15 CC3: Following this Consultation, The Leighton Arms is now included in policy CC3.	N/A

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59. [On pp.46-47 are scanned copies of a letter sent by Savills on behalf of Thames Water – Statutory body.] Dear Sir/Madam, Please find our response to the above attached on behalf of Thames Water Regards, Katherine Jones Planning Administrator Planning	17/04/15	Letter	Katherine Jones Savills	Following this Consultation a section on Infrastructure and Utilities has been added to the introduction in the Plan.	N/A

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 10 APRIL – 17 APRIL 2015

17 April 2015
15.04.17 L CB Camden Draft Kentish Town NP

savills

Sent by email to: secretaryatknf@yahoo.co.uk

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Dear Sir/Madam

CAMDEN – KENTISH TOWN NEIGHBOURHOOD PLAN – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for London Borough of Camden and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:

General Comments on Sewerage/Wastewater Infrastructure capacity:

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure, Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:

"Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver.....the provision of infrastructure for water supply and wastewater...."

Paragraph 162 of the NPPF relates to infrastructure and states:

"Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that **"Adequate water and wastewater infrastructure is needed to support sustainable development"** (Paragraph: 001, Reference ID: 34-001-20140306).

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Specific Comments**Omission of a 'Infrastructure and Utilities' Policy**

With the above points in mind it is important that developers demonstrate that at their development location adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users.

In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Thames Water would therefore recommend that developers engage with us at the earliest opportunity to establish the following:

- the developments demand for water supply and network infrastructure both on and off site and can it be met;
- the developments demand for sewage treatment and sewerage network infrastructure both on and off site and can it be met; and
- the surface water drainage requirements and flood risk of the area and down stream and can it be met.

We therefore consider that there should be a section on 'Infrastructure and Utilities' in the Kentish Town Neighbourhood Plan which states:

'In line with Local Plan Policy DM1 (or as it may change), it is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.'

Further information for Developers on water/sewerage infrastructure can be found on Thames Water's website at: <http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/555.htm>

Or contact can be made with Thames Water Developer Services

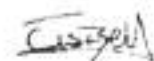
By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;

By telephone on: 0845 850 2777;

Or by email: developer.services@thameswater.co.uk

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely,



Carmelle Bell BA (Hons), MSc, MRTPI
Planner

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 18 APRIL – 25 APRIL 2015

Comment and Number	Date	Email or Box	Name and Address	Relevant Policies, Action Taken	Reason for Non-Action
60. [continued on next three pages] My comments for consideration are as follows: A) POLICY SW2 / SW3 Clarification would good: If retail relates to A1 uses only (Shops, Retail warehouses, Hairdressers, Undertakers, Travel and ticket agencies, Pet shops, Sandwich bars, Showrooms, Domestic hire shops, Dry cleaners, Internet cafés.) then it should be added into the wording of the policy. I suggest upper floors and basements are considered part of the potential high street offer (A1 to A5 uses and services) and as such supported through the KTNP. B) We still have 2 storey high buildings along the high street and I propose that the KTNP supports the extension of these buildings as part of supporting more services, jobs and homes with great access to public transport within the plan area. C) I propose the inclusion of a policy relevant for all major applications that are coming forward along the following lines: PRE-APPLICATION CONSULTATION: Applicants preparing Development Proposals for major development shall facilitate a proactive, early and meaningful engagement with residents and other stakeholders prior to submitting a planning application. Any subsequent planning application will detail this work and indicate how the proposal has responded to comments from the community. Further, applicants are encouraged to submit as part of any planning application the following: a) Full colour drawings and detailed specifications of	20/04/15	Email	Angela Koch	Pre-Application Consultation. Thanked and asked if she'd seen Policy CC1: Statement of Community Consultation. <i>Reply from Angela Koch:</i> I didn't. Apologies. I clearly tried to do this too quickly. There is a lot of very good stuff in CC1. SW2, SW3: Following this Consultation, A1 Retail shops usage details have been added to Glossary Two storey buildings: This must be looked at on a case-by-case basis as applications come in, with consideration to the height and style of the surrounding buildings. GO1: Following this Consultation, Maude Wilkes Estate, off Leighton Road, is now included in this policy as a Local Green Space. We have had discussions with the Housing Association and it will not be opened to the public because it is privately owned.	A1 to A5 uses: Article 4 Direction is now in place on all buildings in Kentish Town Road, therefore any change sought, including from A1 to A2-5, would have to go through a change of use planning application. D2: The suggestions for D2 are premature. This policy relates to future proposals. If and when proposals come forward, there will be intense scrutiny into design quality. D2 / SSP2 / SSP3 / SSP4 / SSP8: These suggestions are useful but premature. In the future, when applications are being considered for these sites, Policy CC1: Statement of Community Consultation will kick in and all these matters will be discussed, as listed in the relevant Policy texts. CC1: In our public consultations there has been strong support for this policy as it stands. SSP9: We have looked at the site next to 65 Bartholomew Road, but it appears to be the entry into a private garden.

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 18 APRIL – 25 APRIL 2015

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proposed main building designs and materials. b) An explanation of how on-site natural building materials and traditional locally sourced materials are reclaimed and reused in the new building structures c) An explanation of the thermal performance of the building and how renewable energy is harnessed in the development, for instance through passive solar gain, insulation and/or application of renewable energy technologies. All applicants are encouraged to seek practical and early advice from the Local Authority and the KTNF. c) How the provision of Sustainable Urban Drainage is achieved. Giving the significance of Policy D Site /CH thinks this is D2/ the Local Planning Authority is strongly requested to apply for a National Design Review to help developing exceptional design quality. It is suggested to organise a well resourced design competition as part of this effort to achieve innovative design. Particularly for: POLICY D2 /SSP2/ SSP3/ SSP4/ SSP8 EXAMPLE: CONTENT OF PRE-APPLICATION CONSULTATION ENGAGEMENT (based on work by CABE,2007) EXISTING STRUCTURES: How existing structures are retained. SCALE, BLOCK STRUCTURE AND URBAN GRAIN: How big the buildings and spaces would be (height, width and length) and how they respond to the surrounding street, plot and building pattern. LANDSCAPING: How open spaces will be treated to enhance and protect the character of a place and foster biodiversity. APPEARANCE: What the building and spaces will look like: building materials, colour palette, fenestration, roofing and other architectural details.	20/04/15	Email	Angela Koch		

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MOVEMENT AND INCLUSIVE ACCESS: Why the access points and routes have been chosen, and how the site responds to street layout, public transport provision and parking needs and how everyone can get to and move through the place on equal terms regardless of age, disability, ethnicity or social grouping. USES AND GROUND FLOOR USES: What buildings and spaces will be used for including proposed uses for ground floors/street level. LAYOUT AND BUILDING LINES: How the buildings and public and private spaces will be arranged on the site, and the relationship between them and the buildings and spaces around the site. RENEWABLE ENERGY EFFICIENCY: How the development and its operation reduce greenhouse gases and makes use of renewable energy sources. KEY REFERENCES –National Planning Policy Framework: §66, §71, §189 POLICY GO1 The open space off Leighton Road lying just north of KT station is not identified in the Local Green Space Designation. It is suggested to designate this space based on the lack of other open spaces in vicinity of hughstreet and make it accessible to the public. Perhaps it could be explored if this land could be CPOed with help of CIL monies. POLICY CC4 I disagree with insisting on A1 uses only. A3 (restaurant/cafe) or/and A4 (Public house, Wine bar or other Drinking establishment) and other 'socialising spaces' could provide an important community focus with a better financial sustainability in the long run. From my observation the shops are not well frequented and underperform their potential as social hubs.	20/04/15	Email	Angela Koch		

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POLICY SSP9: SMALL SITES AND INFILL DEVELOPMENT I propose to add a currently underused site next to 65 Bartholomew Road. It has the potential of providing a terminating view while fulfilling its function as part of Camden School for Girls. I hope these comments are considered useful. 61. A very clear well produced document. I am particularly pleased to see Policy GA -CIL priority. This is an urgent need. The passenger statistics produced by both TfL and Thameslink both show huge increases in the numbers of passengers using the 2 KT stations and this can only increase with new housing developments in the area. These figures would back up this policy. I would like to see something to support and supplement Camden's existing policies on basement developments. The recent problems with the Gloucester Arms site hitting the water table shows that the issue of basement building work is just as important here in KT as in neighbouring areas such as Hampstead. One of the problems that has been identified with basement developments is that structural problems with adjoining properties often do not come to light immediately but only after several years. I would like to see any permitted basement developments required to take out some form of insurance or bond to cover damage to neighbouring properties which might emerge say for up to 5 years after the works are completed. While Camden's existing policies may well prevent some of the more recent excesses, some developments will inevitably be given permission, sometimes after appeal and the adjoining properties would benefit from the protection of an insurance requirement.	20/04/15	Email	Angela Koch	Thanked GA: Support noted for this policy.	Basements: We have discussed including a Basements Policy in the Plan but, since this Consultation was sent out, Camden Council's Basements policy was updated in July 2015 and is now much stronger. We decided that there was nothing extra we could add. We took advice and were told that it would not be in KTNF's remit to impose a demand for insurance or bond to cover third party damage.
	22/04/15	Email	John Nicholson		

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62. We are a group of parents of children in Carlton Primary School, who support strongly one particular proposal in the draft plan: the opening of a passage from Regis Road to Arctic Street. Such a passage - which used to exist - would shorten the journey of our children to school by a third. This is significant, as at the moment the school run takes us 2 hours a day. We believe the Council should do something to improve our situation, since it was the Council who placed our children in this school for lack of any places in any other closer schools. In December 2014, we petitioned the Council with a letter regarding the short-cut access to the school via Regis Road, but the Council has not responded yet (the letter is attached fyi). Please let us know if -and how - we can support you on this specific point of your plan. If you succeed in organising a meeting with the Council on this issue, please could you let us know?	23/04/15	Email	Vessellina Newman	Thanked SSP2 Arctic Street opening: Support for policy noted.	N/A
63. Given Tufnell Park Station serves the eastern part of the Forum area it makes sense to support stepfree access of this station, too. Also to encourage pedestrian access to Hampstead Heath from that station through less polluted streets – perhaps link with Dartmouth Park to signpost such a pedestrian route and take some strain off Kentish Town Station. Also all routes over and under the railway tracks should be wheelchair/bicycle friendly. Such a pity we are losing good industrial space to expensive housing. Thanks to everyone for their industry.	22-24/04/15	Box – Library	Mary Cane	Thanked	GA: This matter was discussed but, as Tufnell Park Station is situated outside the KTNF Area and also in a different borough, it cannot be included in the GA Policy. SSP2: This policy states that industrial space will not be lost; if anything it will increase with mixed use. Camden Council's requirement in a major development (50 homes or more) is for 50% affordable housing, of which 60% is social-affordable rented housing and 40% intermediate housing.

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 18 APRIL – 25 APRIL 2015

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64. Access to Green Space – Canteenlowes prices for pitch hire exclude local community – especially younger people – pitch hire is £90ph!! Something needs to be done!	22- 24/04/15	Box – KT Community Centre	Halima Begum	Spoke to Halima Begum in person (see in next column). Unfortunately this is not within KTNF's remit, but it should be brought to Camden Council's attention.	GO1: The football pitch is owned half by Camden and half by Open Play. 'Barkers' pay £5 each to book the pitch so local youth can't afford it and that's why they hang around estates with nothing to do. It's slightly cheaper if you join the membership but that costs £250pa. Booking the pitch costs about £77 – still too expensive for local youths and local youth groups.
65. Kentish Town is a great place to live. I have lived in KT for 18 years. My main concern is the KT Underground. There's no lift for disabled/parents with buggies. This is something that needs to be looked into.	20- 24/04/15	Box – Somali Centre	Isahaq Abdikarim	Support for GA noted	N/A
66. After going through the Plan I think it should be a key priority to push TFL to introduce lifts for all stations in the Kentish Town area / Camden. The stairs in Kentish Town West are really not appropriate for families and those less able.	20- 24/04/15	Box – Somali Centre	Saida	Support for GA noted	N/A
67. I think more Houses should be built in Kentish Town by Camden. [?Currents there seems] to be a great need for cheaper rented homes. Better lighting between Raglan Street and Inkerman Road Passage.	20- 24/04/15	Box – Somali Centre	Maryam	Housing: Comments noted. Policy SSP2 should improve this situation	Lighting: Not in KTNF's remit
68. The need for better access on a number of train station is also important. Currently I find it hard to take a buggy when travelling via Kentish Town West, Kentish Town Underground.	20- 24/04/15	Box – Somali Centre	Khatra Ahmed	Support for GA noted	

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69. I would welcome the need to move the bus stop next to the Car Wash in Kentish Town High Street as it causes obstruction due to lack of pavement space. I believe the amount of dog waste is out of control in parts of Kentish Town where you can't walk two feet without seeing dog mess on the street.	20- 24/04/15	Box – Somali Centre	Buraicha Mohamoud	Support for SSP3 noted	Dog mess: not within KTNF's remit
70. Better access for disabled people at train station, in need of lifts.	20- 24/04/15	Box – Somali Centre	Kaadiga Yusuf	Support for GA noted	N/A
71. Lowed covers? (pavements) for those less able to walk.	20- 24/04/15	Box – Somali Centre	Said Guled	Lowered pavements: this will be taken into consideration for detailed design guidance in new developments.	N/A
72. As I have elder family members who use the station, and have problems with the stairs, I champion the idea of installing lifts at the station for best convenience.	20- 24/04/15	Box – Somali Centre	Mohamed Gelle	Support for GA noted	N/A
73. The idea of getting lifts installed into station is perfect for me and my family as they can't use the stairs. I've seen other elderly people around the local station who find it difficult to use the stairs.	20- 24/04/15	Box – Somali Centre	Ahmed Abalcarim	Support for GA noted	N/A
74. More Centre for young children to access after school and school holidays.	20- 24/04/15	Box – Somali Centre	Quall Buracaale	Support for CC2 noted	N/A
75. Step free stairs in Kentish Town Station. Through road would be nice between Kelly Street and Prince of Wales junction. Improvements to Falkland Place.	20- 24/04/15	Box – Somali Centre	Abdi Ahmed Ali	Support for GA noted Policy GO1 Local Green Spaces: There have been consultations recently about improvements to Falkland Place. GO1 will help.	Through road: Not within KTNF's remit

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76. I think the Neighbourhood Plan has been put together really well and it touches upon very key issues in Kentish Town like Underground station which is currently is not really suitable for a disabled person or those with young children in a buggy. The decline in new businesses taking up vacant spaces is also a real worry as the high street is now dominated by estate agents, coffee shops, large chain supermarkets and betting shops. I think more opportunities need to be invested for Youth in the area. Possibly a sub-hub for 16-14 year olds.	20-24/04/15	Box – Somali Centre	Abdi Kadir	Support for GA noted Decline in new businesses: Policies SW2; SW3 should improve this situation. SSP2: Community leisure facilities are included in the details of this policy.	N/A

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77A. I am from Gospel Oak Regeneration area next door. We urgently need to talk about border areas BEFORE deadline for comments, eg Fri or sat.	23/04/15	Email	Dinah Gallop GONAG Gospel Oak neighbourhood action group	Thanked and asked for written comments (see below).	N/A
77B. [Comment continues on next two pages] Please see attached. We have only just become aware of the geographical extent of this plan. We would like to meet. Elaine Grove and Oak Village Residents' Association This is a response to the draft Kentish Town Plan from Elaine Grove and Oak Village Residents' Association (EGOVRA)... We have been active in the preparation of plans for the neighbouring Gospel Oak Regeneration area. I have copied this response to Gospel Oak Neighbourhood Action Group, a coordinating body for many groups in the area. First of all let us congratulate you on the production of the plan which obviously involved a huge amount of work. As the plan area adjoins the Gospel Oak Regeneration Area (GORA) on its western side discussion with us in this area is essential so a relationship between plans for both areas is established. There is also a Gospel Oak Business Group which covers a wider area than the regeneration area, including part of the KTNF area, as business does not identify with ward boundaries. Discussion with this group is also important. Most of the land in the GORA is owned by Camden Council and used for social housing. In order to improve the run down social housing stock, the Council is making use of high land values.	27/04/15	Email	As above	Thanked and said a meeting will be arranged. SSP2 Community Facilities: KTNF has not specified a dedicated space for other faiths. When development comes forward on these sites we will discuss the use of community facilities. Communication links: following comments from this Consultation, the Plan now has a map showing possible communication links through the Regis Road site. We haven't shown similar for the Murphy site because there are no plans for development here at the present time. D2: green route to Gospel Oak is specifically mentioned in the Plan	SSP8 Veolia Site: in the Plan the development of this site is specified as a mainly C3 residential-led mixed use scheme. L B Camden has approved this because housing is badly needed. However, this policy is looking to the future. Camden doesn't have plans for developing the site in the near future. SSP2 Kentish Town Industry Area: the Plan provides for workshops and workspaces suitable for small businesses and start-ups on both the Murphy and Regis Road sites.

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Considerable intensification is therefore planned including the building of up to 700 more homes in the area between Mansfield Road and Queens Crescent. More than 250 of these already have planning permission. Sadly this has included the demolition of workshops and the selling off of land in the area leading to a considerable reduction in employment spaces. And whilst housing plans have been given priority, plans for community and commercial facilities to revitalise the area and to serve the growing population have yet to emerge. Thus there is the real danger of a 'dormitory town' being created to the west of the KT area, an undesirable development for both Gospel Oakers and Kentish towners. This informs our response below. Site specific policies 1. Veolia site This is currently a mixed use site and a mini employment hub supporting over 200 jobs. It lies on the border of the Kentish Town and Gospel Oak area and its development cannot be determined without considering what is happening to the west and north of it. Given: - The large amount of new housing already planned to the west. - The considerable loss of employment space already suffered Gospel Oak and Haverstock wards. - The easy accessibility of this site to the people of Gospel Oak in contrast to difficult access to both the Regis Road and Murphy's sites This site should remain a mixed use site with a significant employment hub rather than become residential-led site. This is consistent with plans to protect employment spaces. 2. Kentish Town industrial area Adequate provision on both the Murphy's and Regis Road sites for workshops and workspaces suitable for small businesses and start-ups is essential.	27/04/15	Email	Dinah Gallop		

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3 Community Facilities The plan area has plenty of churches but no dedicated space for other faiths, in particular the growing Muslim population. We suggest that provision id needed for either a mosque of a "Faith Space" facility which can be used by all faiths. 4 Communication links The lack of east west communication links between Kentish Town and Gospel Oak creates a major and undesirable barrier between the two communities. We have strong common interests here. We have, for example been campaigning for many years for a route for pedestrians and cyclists to Regis Road. An examination of other possible links would be beneficial. Finally, can we reemphasise the urgent need for discussion with Gospel Oak groups, including GONAG and the Gospel Oak Business Group. Dinah Gallop Secretary Elaine Grove and Oak Village Residents Association	27/04/15	Email	Dinah Gallop		
78. [Comment continues on next page] Policy SW - Shopping and Working "Fewer young people are coming to KTHS" - so who is turned on by the numerous fast food outlets? Certainly not the oldies, who long for a comfortable brasserie type restaurant! We came to Camden Town as a young hard-up couple in 1961 and moved to Kentish Town in 1966. We watched our lovely veg stalls disappear and be replaced by the terrible tat stalls. Recently three really good and useful shops disappeared from Camden. This gives KTHS an opportunity to redress the balance. We do have some useful shops in KTHS of course - we just need to cut down on fast food, estate agents, betting shops, and endless little useless shops that appear and disappear because they do not sell	23/04/15	Email	Rosemary White,	Thanked 27/04/15 Support noted for CC3; SSP1; SSP7	SW2, SW3: These policies in the Plan should improve the shops in the secondary areas. Planning rules prevent the exclusion of different types of A1 Retail shops but over-provision of estate agents and betting shops is regulated. Shopping & Working Project: supports design principles for shop fronts

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anything anyone really wants! And how we miss that lovely Pizza Express, and now, tragically, we've lost the Kentish Canteen!	23/04/15	Email	Rosemary White		
Policy C3 and C4 The few remaining pubs and other interesting buildings must be protected from hideous modernising (and silly names) that has taken place in Camden Town. And would it be possible to have some kind of overall design advice for would be shops. Most of them look so dreary!					
KT Square A brilliant idea! But "provision for a market" alarms me! How can we ensure that it is a proper market and not like Camden High Street. Which reminds me to ask if we could manage without any more tattooists!					
Policy SP7.2 Planning app for theatre - brilliant! And please can we have a good cafe or restaurant attached.					
I think this is enough for now, but I would love to be involved as plans mature.					
79. Dear Kentish Town Neighbourhood Forum Please find attached a copy of the Mayor's letter in response to the Kentish Town Neighbourhood Development Plan 2015-2030 - Draft for Consultation. The original letter will be posted to you. Also attached for your information is the Mayor's response to the Draft Camden Local Plan Consultation. Please do not hesitate to contact me if you would like to discuss any of the representations in the letter. Actions taken continues on next page Mayor's Letter copied on following three pages TfL comments on following two pages	24/04/15	Email	Elliot Kemp MRTPI Greater London Authority and Transport for London	SSP2: Kentish Town Industry Area; the London Plan; the Draft Camden Local Plan; General conformity and evidence base. KTNF spent several months redrafting the Policy (which is now SP2 and SP2a in the Submission Plan). On 25 September 2015 the GLA and TfL replied to the last draft. "We welcome the changes made to the text which address many of the comments in my email of 8 August 2015. In particular we welcome the changes in the document to explicitly reference employment floorspace rather than employment levels. However, we have the following comments on the current text. The reasoned justification for Policy SP2 on page 40 states: 'Policy SP2a is in conformity with the London Plan, published March 2015, which states that London's population is anticipated to rise from 8.2 million in 2011 to 8.84 million in 2031, and that the Mayor seeks to 'accommodate growth within the capital's boundaries and without intruding on its protected green and open	

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79. GLA and TfL comments	24/04/15	Email	Elliot Kemp MRTPI Greater London Authority Transport for London	SP2: Kentish Town Industry Area; the London Plan; the Draft Camden Local Plan; General conformity and evidence base. KTNF spent several months redrafting the Policy (which is now SP2 and SP2a in the Submission Plan). On 25 September 2015 the GLA and TfL replied to the last draft. "We welcome the changes made to the text which address many of the comments in my email of 8 August 2015. In particular we welcome the changes in the document to explicitly reference employment floorspace rather than employment levels. However, we have the following comments on the current text. The reasoned justification for Policy SP2 on page 40 states: 'Policy SP2a is in conformity with the London Plan, published March 2015, which states that London's population is anticipated to rise from 8.2 million in 2011 to 8.84 million in 2031, and that the Mayor seeks to 'accommodate growth within the capital's boundaries and without intruding on its protected green and open	

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Kentish Town Neighbourhood Forum
C/o Kentish Town Library
262-266 Kentish Town Road
London
NW5 2AA

Our ref: LDF06/LDD14/EK01

Date: 24 April 2015

Dear Neighbourhood Forum

Re: Kentish Town Neighbourhood Development Plan 2015-2030 -Draft for Consultation March 2015

Thank you for consulting the Mayor of London on the Kentish Town Neighbourhood Development Plan 2015-2030 -Draft for Consultation. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the Kentish Town Neighbourhood Area includes all the Development Plan Documents (DPD) adopted by Camden Council and the London Plan. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London are attached in Appendix 1.

The draft Neighbourhood Plan is generally welcomed, however, there are some matters that require further work to ensure the plan is in general conformity with the London Plan as well as the other strategic policies in the Local Plan. The representations below and in the accompanying appendix address matters of general conformity, and also provide comments which are intended to help clarify or improve policy.

Kentish Town Industrial Area

Policy SSP2 and the accompanying Site Policy 1a and Site Policy 1b propose to permit the comprehensive redevelopment of the area currently defined in Camden's Core Strategy as the Kentish Town Industrial Area, which is a locally significant industrial site in terms of the London Plan. The draft Neighbourhood Plan policies support the introduction of non-industrial uses to this area, including: residential, offices, educational institutions, healthcare and community leisure facilities.

Managing industrial land supply in London

The London Plan seeks to manage the supply of industrial land across London to ensure there is a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including the need for waste management facilities. Inner London industrial sites also serve a particularly important function for London's economy by providing sustainable distribution services for the Central Activities Zone. Some of these industrial uses may have low employment densities but provide vital services which support other businesses in London, many of which will have significantly higher employment densities.

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London Plan Policy 4.4 (Managing Industrial Land and Premises) requires boroughs to demonstrate how the borough's stock of industrial land and premises will be planned and managed to ensure there is ensure there is a sufficient stock of industrial land and premises. Robust evidence in the form of integrated strategic and local assessments of industrial demand is required to inform the release of industrial capacity. The London Plan supports the release of identified surplus industrial land to help meet requirements for a mix of other uses such as housing, social infrastructure and in appropriate locations to contribute to town centre renewal. However, the release of industrial capacity must be justified by robust evidence.

As part of managing London's industrial land and its release, the London Plan groups London boroughs by categories for the transfer of industrial land to other uses (see map 4.1) based on the borough's benchmarked release of industrial land. Camden is placed in the 'restrictive' group for the transfer of industrial land to other uses. Boroughs placed in the restricted transfer category typically have low levels of industrial land relative to demand. These boroughs are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses and set appropriate evidence based criteria to manage smaller non-designated sites. This does not preclude the possibility of smaller scale release where boroughs have made adequate provision for industrial land in their DPDs, especially for waste management, logistics and for SMEs/creative industries. The Mayor's Land for Industry and Transport Supplementary Planning Documents (SPG) sets out the indicative industrial land release benchmarks for Camden of -5 ha for 2011-2031 (-0.3 ha per annum). The Mayor's Annual Monitoring Reports show that Camden has already released a total of 4.6 ha in the first 3 years of this period (FY2011-FY2013) in planning approvals.

Draft Camden Local Plan

Camden Council has recently consulted on its draft Camden Local Plan 2015, which proposes to de-designate part of the existing Kentish Town Industrial Area. The industrial area proposed to be released approximates to the Regis Road Site (Site Policy 1a in the Neighbourhood Plan), and the area the Council are proposing to retain as a protected designated industrial area approximates to the Murphy Site (Site Policy 1b in the Neighbourhood Plan). The Mayor has made representations to Camden Council on the draft Local Plan and I attach these to this letter for your information. The Council's current evidence base (LB Camden Employment Land Study 2014) does not currently justify the de-designation of the Regis Road part of the Kentish Town Industrial area. However, the Council may wish to provide further evidence to the GLA on this issue.

General conformity and evidence base

The proposed mix of uses in Site Policy 1a and 1B are unlikely to be compatible with requirements of London Plan industrial land policy and could undermine the integrity of the industrial area. The Neighbourhood Plan will effectively de-designate the Kentish Town Industrial Area. As acknowledged in the draft Neighbourhood Plan, the proposed policies for this area are not in conformity with Camden's Core Strategy Policy CS8, and Development Policy DP13. It should be noted that if the Council's draft Local Plan policy for the Regis Road site was adopted the Neighbourhood Plan's policy for the Murphy Site would still not be in conformity with Camden's new Local Plan.

The Neighbourhood Plan lacks the robust evidence base necessary to justify de-designating the Kentish Town Industrial Area, as required by London Plan Policy 4.4. Planning for this locally significant industrial site needs to be based on a strategy for the supply and management of industrial land in Camden, and its relationship with London's economy. The Mayor's Land for Industry and Transport SPG provides guidance for developing the required evidence base to plan, monitor and manage industrial land.

- 2 -

The SPG highlights that in managing and reviewing industrial capacity account should be taken of the scope for consolidating industrial capacity at particularly appropriate locations. However, this should be considered in the light of strategic and local assessments of industrial land demand and supply (quantitative and qualitative) and must be informed by a robust appreciation of short and longer term market trends and policy guidance. It must also be cast in the context of robust and sensitive relocation arrangements, which ensure that London jobs, and Londoners' access to them, are not compromised. This exercise must be coordinated strategically (and structured to minimise 'hope value') taking account of transport and regeneration as well as planning objectives to ensure that London's overall future industrial needs are addressed.

I hope that the matters raised within this consultation response will be resolved through joint discussions between the Neighbourhood Forum, Camden Council officers and GLA officers. If you would like to discuss any of my representations in more detail, please contact Elliot Kemp (020 7983 4908 / elliott.kemp@london.gov.uk) who will be happy to discuss and arrange a meeting.

Yours sincerely,



Stewart Murray
Assistant Director – Planning

cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

Appendix 1: Comments from Transport for London

Kentish Town station is located in the centre of the Kentish Town Neighbourhood Plan area and provides London Underground services on the High Barnet branch of the Northern line, as well as Thameslink national rail services. To the west of the plan area is Kentish Town West station, which provides London Overground services. There are also numerous bus services operating in the area, particularly along Kentish Town Road. As such, the majority of the plan area records an excellent Public Transport Access Level (PTAL) of 6, the highest possible, although some areas in the east and west of the plan area record PTALs of 4 or 5 (representing good or very good levels of access respectively), notably around Regis Road.

The A503 Camden Road forms part of the Transport for London Road Network (TLRN) and forms part of the south-eastern boundary of the plan area, and the A400 Kentish Town Road / Fortress Road that runs from north to south through the middle of the plan area forms part of the Strategic Road Network.

Policy GA supports the implementation of step free access at Kentish Town and Kentish Town West stations and identifies this as a CIL priority for the portion of CIL receipts collected by the Neighbourhood Forum. TfL is fully in agreement over the importance of step free access at stations and is working towards its introduction in as many locations as possible. However, it must be acknowledged that retrofitting step free access into existing stations is often a lengthy and expensive process and as such schemes are subject to prioritisation to ensure that resources are used in the most effective way possible. At present, other stations within Camden are being given a higher priority for step free access and although this could change in future, particularly if significant funding was to be identified for an intervention at Kentish Town, it is unlikely that a significant proportion of the cost of such a scheme could be secured via CIL. As such, it may be pragmatic to consider whether there are other interventions that could be delivered by CIL payments to help improve access to stations, such as improved public realm, pedestrian facilities or bus infrastructure.

Policy SSP1 identifies a further CIL priority as a Kentish Town Square. Although TfL would welcome any proposals to improve the public realm and to aid interchange between rail, underground and bus, it must also be acknowledged that Kentish Town Road forms part of the Strategic Road Network, which performs an important function in moving people through the area. TfL would request that it is consulted on any proposals for the square and to help inform the evidence base for any intervention in this location, the forum may be interested to note that TfL is currently engaging with Camden council to map the 'street types' of all roads in the borough, responding to their importance both for the movement of people and as a place. It should also be noted that as with the above comments on step free access, any proposals that incorporate decking above the railway lines are likely to be expensive and may not be easily funded through CIL.

If a revised plan considers the development of the Regis Road site, please note the transport and access arrangement will need to be discussed with TfL.

Policy SSP3 relates to the car wash site at 369-377 Kentish Town Road, and the requirement to widen the footway to provide for better pedestrian facilities is supported. However, for the avoidance of doubt this policy should refer to the relocation of the bus shelter rather than the bus stop, and that the pavement would be widened through the adoption of land within the site as highway rather than through building out into the carriageway.

'Getting Around Project 2' states that 'all new developments must incorporate racks for secure bicycle parking. Any new developments must include secure and easily accessible bicycle parking racks and also consider stations for bicycle hire schemes'. It may be useful here to clarify whether the plan would seek bicycle parking over and above that required by the London Plan. It should also be noted that at present the Santander Cycles scheme does not extend north of Camden Town, although given the proximity of Kentish Town consideration could be given to its introduction in the area. This would however be subject to land for sites being identified and safeguarded, funding secured and any sites coming forward not being isolated from the rest of the network.

80. Letter from Pat Gibson copied on next two pages

24/04/15

Box –
Library

Pat Gibson
Highgate Road
Residents' Group

D2 Railway lands: This policy relates to future proposals. If and when proposals come forward, there will be intense scrutiny into the applications.

Area: The KTNP Area ends in the north just before Gordon House Road, at the railway line.

SSP3 Car Wash:

Restaurant is only one option. The other is A1 Retail. These options were suggested by the owner. He will have to apply for planning permission.

Tally Ho site: The ground

floor was given planning permission for A1 Retail years ago. KTRA objected at the time but lost.

SSP1 Town Square: The

policy includes a market which covers coffee and flower stalls.

SP2 Regis Road site: This

policy includes green space.

Re Kentish Town neighbourhood plan

From Patricia Gibson, 3 Highgate Road, NW5 1JY (also sec Highgate Rd. Residents' Group)

24 April 2015

1. Having read your report, it seems that Highgate Road is being treated rather like a poor relation by your members. Despite its having listed buildings: viz The Forum, Little College Street, this terrace and other rows of 18th century houses, we only seem to figure in your ambitious plans as an area on which to build but not, it appears, to preserve or improve aesthetically. (Even the warehouses have their merit.)

Kentish Town surely ends at Gordon House Road, not the junction of Highgate and Fortress Road.

2. Although I agree with your Policy SSP3: Car Wash Site as far as extending the pavement and moving the bus stop back, you cannot seriously suggest that another restaurant should be encouraged under the proposed flats? At a rough count, there are now in excess of 45 establishments selling food between the beginning of Kentish Town Road and Gordon House Road. What we need are more small, useful businesses – which you appear to champion on paper - NOT more restaurants.
3. I am also amazed that, despite this desire for more small businesses which appears in your manifesto, you haven't risen as one against the opening of yet another chain retail store: the small Co-op under the Tally Ho flats. Why not? We don't need it with two corner shops and Sainsbury's within minutes of each other. And won't this chain disastrously affect those two tiny shops? The preservation of existing small businesses and the exclusion of more chains should be a priority in this area. Hampstead Village is the ultimate example of what should not be allowed to happen here.
4. Policy SSP1. Town Square. When my husband and I moved here in 1979, there was a charming little row of shops on this pavement including a coal merchant, a florist and a baker's. Suddenly they were swept away. I welcome the idea of a square, providing it didn't mean that Natasha's Flowers and the hardworking coffee van man were removed. They are popular with locals and commuters alike and work very hard to survive against fierce competition. It would be a great pity if, in your zeal to make this rhomboid look more appealing, you forget about these two small, welcome businesses. (Who also have to contend with the local drunks, as this space now stands.)
5. Lastly I come to your somewhat grandiose idea for houses to be built over the railway lines.
I agree we need more affordable houses, but it would cost a fortune to construct a raft of the kind suggested. There would be vibration from trains passing underneath, surely affecting house foundations, plus longterm disruption to railway services, pollution, destruction of trees, diminishing of light in existing properties backing on to the raft. Given the amount of money it would cost to construct these dwellings, I do not see how they could possibly be AFFORDABLE! The property developer is going to want his money back and a profit.

6 I am, however, in favour of the regeneration of Regis Road site, but it should not be a sea of concrete flats and offices. Kentish Town needs more green spaces as well. The same principal should also pertain to any building on the Murphy site. There are plenty of trees alongside the railway tracks here and obsession with “rafts” should not mean their destruction.

In general, I am pleased that your members are working towards an improvement in this area, but I hope they will seriously consider the opinions and suggestions of local residents. We do live here, too!

I do not want Kentish Town to turn into a bland could-be-anywhere place to live, but in the past 30-odd years I have seen so many useful shops close. It is even more important now to preserve the good things we have, to ensure that estate agents, chain stores and restaurants do not squeeze out hardware shops, fishmongers, vegetable barrows, bakers, or charming old pubs disappear. They are part of what makes this area special.

ENDS

KENTISH TOWN NEIGHBOURHOOD PLAN – PRE-CONSULTATION COMMENTS 23 APRIL – 28 APRIL 2015

Comment and Number	Date	Email or Box	Name and Address	Relevant Policies, Action Taken	Reason for Non-Action
81. Dear Members, thanks for your work on the plan and protecting the community. Just a few key areas that come to mind in relation to the plan: - secure/increase council housing/ensuring developers contribute beyond lip service - protection of all public spaces at all levels - introduction of traffic-free Sundays on high street (if part of the remit of the plan) - introduction of first steps towards community-run green energy provision (e.g. via allocation of space for this - ensuring private developers have to allocate roof space etc.). - creation of additional community space/reclaiming of industrial areas/waste land instead of development Many thanks and best wishes. Tobias	24/04/15	Email	Tobias Nolte	Thanked Council Housing: Camden Council's requirement in a major development (50 homes or more) is for 50% affordable housing, of which 60% is social-affordable rented housing and 40% intermediate housing. Therefore, whenever the Plan supports affordable housing, it is supporting social-rented housing as well.	GO1 & GO2: These policies seek to protect all the public and open spaces in the NP Area. Traffic-free Sundays are not in the remit of the Plan. Green energy: this is included in the SSP2 policy for the development of the Industry Area. Community space: this is included in the SSP2 policy. The main purpose of Neighbourhood Plans is development and land use, but this can include community use as SSP2 does. Project: This was discussed in committee but thought to be non-viable
82. A project idea: How about the patch of grass adjacent to College Lane and the Gospel Oak - Barking railway line being developed as a community orchard? Maybe with input from Transition Kentish Town and Garden Organic / similar organisations (and me!). Maybe some funding from the property development of the old railway social club near to this site.	26/04/15	Email	Liz Sheridan	Thanked	

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Comment and Number	Date	Email or Box	Name and Address	Relevant Policies, Action Taken	Reason for Non-Action
83. [Comments continued on next page] First of all I wanted to congratulate you all on the KT Neighbourhood Plan - it's a great document, thank you for all the hard work in making it happen! I have a question about what happens when the 15 years of the Plan is up - can it roll on, or be renewed, or updated? My comments are below, I hope they make sense. Many thanks and kind regards, Sarah My general comments are: • Cycling and including an alternative north-south cycle route that runs parallel to Kentish Town Road with access by bridge over the railway - and an east-west cycle/pedestrian route - through to Lismore Circus area/Kentish Town West area • Include and embed, in a much stronger way the need for sustainable practice to be a requirement in all new building and retrofitting work • Dedicated parkland and/or woodland to be required as part of any developments at Regis Road and the Murphy site Specific comments: Page 18 - Policy D3 - Design Principles for innovative building design: There doesn't seem to be any mention at all about sustainability being a required part of innovative design within this policy, which feels like a glaring omission and therefore needs to be included. Pages 27-28 Policy CC1 - Statement of Community Consultation: The phrase 'Applicants proposing major developments.....are strongly encouraged' really needs strengthening to make it a requirement that any potential applicants for major developments must consult the community pre-application	26/04/15	Email	Sarah Nicholl	Thanked 27/04/15 Following this consultation, 'Sustainability or Sustainable' have been added to policies: D3; SSP3; SSP4. SSP2: following this consultation, provision for an east-west cycle and pedestrian route has been added to this policy. SSP4 York Mews & SSP5 Frideswide Place: following this consultation, a cycle link has been added to SSP4. However the pedestrian link from the bridge by Kentish Town station may not be suitable for cycles. This will be reviewed when development comes forward. Green & Open Spaces Project: following this consultation, the statement has been deleted from this policy. Policy SSP2 specifies green and open spaces. Woodland exists on the Murphy site at present and there are no plans to remove it.	The Plan can be updated after 5 years. After 15 years a new Plan can be produced (and presumably this one used as a basis). Cycling routes: Kentish Town West is outside the Plan Area. CC1: 'encouraged' is a planning policy term. We have been told not to write 'must' or 'will' - if we do the policy will be turned down. SSP7: There is a plan for a cinema at 187 Kentish Town Road, but this has not been formalised yet. There are no plans for a theatre here.

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Comment and Number	Date	Email or Box	Name and Address	Relevant Policies, Action Taken	Reason for Non-Action
Page 34 - Policy SSP2 - Development Brief: I can't see a mention of an east-west cycle/pedestrian route - wondering if this can be incorporated into this policy, presuming this would have to be in collaboration with Dartmouth Park NF though? Page 38 - Policy SSP3 & SSP4: I can't see any mention of sustainability as a requirement for any new buildings on this site? Again my comment is this needs to be a requirement as part of the policy. Page 39 & 40: Policy SSP4 York Mews & SSP5 Frideswide Place: It's not specifically mentioned in either of these policies but, I'm presuming the pedestrian link and the pedestrian link from the bridge by KT station will also be suitable for bicycles as well? Page 42 - SSP6 - It doesn't seem to be included in this policy but is there a plan to create a north-south cycle route that runs parallel to Kentish Town Road, via Wolsey Mews etc? Page 42 - I've no objections to the plan for a theatre, however isn't there already a plan for a cinema/theatre at the old North London Poly/Pizza Express site opposite? Projects page 51 - Green & Open Spaces Project: I disagree with the statement here as it seems completely possible to increase/include green space by incorporating dedicated woodland and/or a park area as a required part of any redevelopment at both the Murphy and Regis Road sites and possibly also at the Veolia site.	28/04/15	Email	Sarah Nicholl		

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84. [Comments continue on next page] Many thanks for the great, detailed work in pulling together the KT Neighbourhood Plan. As requested, please see below for my comments. Policies: SW1 - In its substance, SW1 opposes the unrestricted change of use from commercial to residential property for spaces that cater for small businesses (up to 20 employees). This is not clear from the policy title, and might benefit from clearer language. CC3 - Perhaps out of the Development Plan catchment area, but I would note that Tapping the Admiral is an extremely valued and well-integrated pub in the local area. Projects: Green and open spaces project - we completely support this project, and would strongly recommend the addition of trees on the high street. This would not only bring a visual improvement but would also have health and environmental benefits. Perhaps already covered in Camden Policy, but the stronger the support for this the better. Anglers Lane project - Again, fully support the project as outlined, but could it go further? Pedestrianised (or resident access only), potential for small retail/cafe/restaurant area? As it stands, the office development can feel rather unconnected to the road and the traffic is a real hazard. Shopping and working project - The examples of positive vs negative shop fronts are also highly influenced by the shop signage. As it stands this project focuses on obscured shop front and shutters. Supporting better/more sympathetic signage design would also have a big impact. General: As you will probably know, Kentish Town has a growing reputation as a startup hub, particularly in the tech sector but also independent coffee shops/cafes/restaurants. This is reflected in the great	26/04/15	Email	James Lowery & Carly	Thanked 27/04/15 SW1: Following this consultation, the policy has been strengthened Shopping & Working Project: we will look at the whole design of shop fronts, including signage, when this project is being worked on.	CC3: Tapping the Admiral is outside the KTNF Area and therefore cannot be included in the policy. Green and open spaces Project: Tree planting in Kentish Town Road is already specified in the Green Gateways section of the project. Anglers Lane Project: the Council is looking into ways to improve the traffic situation here. Alternative solutions will be considered. Kentish Cluster etc: we are in touch with this group. The Plan is particularly strong in support of small business and start-ups. Waste etc: These matters are not about development and land use and therefore are not relevant to the Plan. Kentish Town Road Action is the group that can deal with them.

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support for the Kentish Cluster - a local group of around 800 members who live and/or work in the area in the start-up sector (see Kentishtowner article here). Could the plan support this group and associated Industries more? Particularly given the new tech powerhouses that are moving into Kings Cross and the plans of the new Hawley Wharf/Camden Market development. Could KTNF help to influence some smaller points too? For example, the waste collection policy for shops on the High Street? More bins? Pressure for more regular street cleaning, including chewing gum removal? Better Christmas decorations? Perhaps down in the weeds a bit, but small changes could make a big difference to the high street. Once again, well done with the plan. It really is looking in great shape and it is evident that you've put a lot of time and effort into its development.	26/04/15	Email	James Lowery & Carly		
85. [Comment continues on next page] I've just been reading through the Plan (final comments date has snuck up on me). Such great stuff in here in so many ways. My interest is in maintaining a strong social mix as Kentish Town develops. That's what makes the place an interesting area to live. I know affordable housing is key to this, and I can see how this is being addressed by the KTNF. Is it at all possible to also look at the mix of retail on offer? There ought also to be a way of ensuring affordable shops? I am involved with the Friends of Fortress Road, a small group of neighbours who became concerned when Costa arrived that we might be headed for a local shopping street full of chain stores. That hasn't happened yet, but there is now a concern that the new Fortress Road shops are out of reach for many locals. I've spoken to longterm residents who are feeling priced out. We recently campaigned to save the much loved	27/04/15	Email	Alison Huntington	Thanked	A1 Retail: in planning law different types of A1 Retail cannot be excluded in a shopping street or elsewhere.

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and much used LCCCP (London Centre for Children with Cerebral Palsy) Charity Shop on Fortress Road whose lease was not renewed, largely it seems because its face didn't fit with the up-market route the street is taking. It would be great if the plan could in some way take this into account. Many thanks for the great work being done on our behalf.	27/04/15	Email	Allison Huntington		
86. Plan response - co-ordinated workspace promotion Hello, I chair the Gospel Oak Business Group, centred around Queen's Crescent Market, but working with businesses right up to the border of the area covered by your plan. I think you've done a thoughtful and thoroughgoing job of this and wish to offer our support for the principles and practical outcomes that you are advocating. I am writing with particular regard to the safeguarding, promotion and creation of employment and workspace in our area. You quote the noble intentions of Camden in advocating and delivering this policy, and we see some evidence of it taking place (pop up shop activity in particular). However, such is the financial pressure on the council that we see many instances of unfettered residential development taking place at direct cost to employment space. We would be glad to share our insight and, where appropriate, campaign collectively to ensure that small local businesses can be afforded the opportunity - i.e. space - to thrive, and by doing so contribute to the quality of life in our area. Please feel free to contact me above; all good luck meanwhile	27/04/15	Email	James Waite	Thanked and said a meeting will be arranged including Gospel Oak Business Group.	N/A

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87. [Comments continue on the next two pages] I think the Plan is superb, an extremely comprehensive document and excellently prepared. However I do have the following comments, one being a major one concerning the Kelly Street public open space. Section 1: Introduction p. 6, "Design Quality": para 2 states that buildings "outside the borders of Conservation Areas have no special protection unless they have been Locally Listed." I wonder why there's no reference here to buildings Listed by English Heritage. Maybe there is a reason, but if not could I suggest this reads "outside the borders of Conservation Areas have no special protection unless they have been Listed by English Heritage or are Locally Listed." p. 9 "Examination & Referendum": para 3 begins by stating that "If the Neighbourhood Plan is successful at examination and referendum and is brought into legal force by the planning authority . . ." I wonder if it is worth repeating here that this will happen if 51% of respondents in the Referendum approve the Plan? p. 11, para 4 of "6: Community & Culture": worth referring here to how the community could afford to buy a pub? Section 2: Policies p. 17, Policy D1, "Justification": para 1 states that "People say that they love the feeling of openness and space they receive when emerging from the station or walking in the street in this part of Kentish Town." The word "receive" reads oddly to me; could I suggest the word "experience" instead? p. 18, Policy D2, "Justification", (c) at end of para 3: surely this is spell Osney (Crescent), not Osney?	27/04/15	Email	Rosemary Lewin Chair, Kelly Street Residents Association	Thanked 28/04/15 Design Quality: suggestion has been added to the Plan. Examination & Referendum: suggestion has been added to the Plan. D2: Now corrected in text. CC4: Photos – these have been corrected. Green & Open Spaces Project: this has been amended and approved by the Kelly Street Residents Association	Community & Culture: How the community could afford to buy a pub is not the Plan's responsibility to suggest. D1: This sentence is no longer in the text. Green & Open Spaces: The space suggested is not a discrete contained space which is needed to qualify as a Local Green Space.

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p. 24, "Green & Open Spaces Policies": I assume this section is primarily about green open spaces? There is an open space area at the Castlehaven Rd end of Kelly Street (see comment below), but it is not particularly green, so presumably is not appropriate to be included here. p. 31, Policy CC4, photos: the descriptions of the bottom two photos of convenience stores are the wrong way round. Section 4: Projects p. 51, "Green & Open Spaces Project", 6: Kelly Street/Prince of Wales Road junction. I am very concerned that this possible project is included in this form in the Plan. * It is not at the junction of Kelly St & Prince of Wales Road. It is at the junction of Kelly St & Castlehaven Rd. There is a row of several houses between the end of Kelly St. and Prince of Wales Rd. * The suggestion reads: "Kelly Street / Prince of Wales Road junction: enhance the existing open space with further planted raised beds and seating, and possibly close one or two parking spaces to develop a 'pocket park'." * As Chair of the Kelly St Residents Association, I regret that there has been no liaison between KTNF and us about this possible project being included in the KTNPlan. For some months we have been in discussion with local Councillors & Council officers about severe problems that have been experienced with the open space. The seating (the circular bench) has for months been attracting rubbish, drunkards, and (most seriously) drug dealers & addicts, who have threatened & frightened residents. These included the Minister of the Congregational Church, who was so deeply affected that he has moved away. Other	27/04/15	Email	Rosemary Lewin		

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residents at that end of Kelly St. are also at the limit of what they can endure & are thinking of leaving the street. The almost unanimous opinion of Kelly St residents, the residents of the 60 flats in 1 Prince of Wales Road, and the police is that the circular bench must now be removed. An architect resident of Kelly Street has prepared two possible plans for re-designing the open space area, including re-designing the cycle gap installed by the Council last summer. This lets motorbikes & scooters through Kelly Street, threatening the safety of children who play in the street (something not referred to as a policy in the KTNPlan?), as well as of pedestrians, cyclists & car users - i.e. everyone. A small group of residents is about to examine the two designs, & put them out for consultation to other residents & ward Councillors. We need to estimate their cost and raise funds. There are, however, two aspects of the wording copied above from the Plan which we could not contemplate: more seating (which would encourage the very problems we're trying to design out of the open space), and planted raised beds. There would be problems maintaining these (residents could not be guaranteed to water & maintain them), and there is a risk that they would attract rubbish and vandalism (as experienced in the Castlehaven Community Centre's community garden). Council officers are currently trying to establish the ownership of the open space. A small part of it is owned by the company formed by the residents of 1 Prince of Wales Rd. We assume that the remainder is owned by the Council, but Council officers have not been able to confirm this from their records. We hope it will be confirmed soon. I very much hope that we and KTNF will be able to discuss the Kelly St open space in the near future,	27/04/15	Email	Rosemary Lewin		

