

## Comments on Hampstead Neighbourhood Plan, Submission Draft from London Borough of Camden (Regeneration and Planning service)

*The comments below are Camden Council's representation on the submission draft of the Hampstead Neighbourhood Plan and include input from all relevant Council services.*

The Council's representation seeks to address the Neighbourhood Plan's conformity with policies set out in the adopted Camden Local Plan and its consistency with national policy, in particular paragraph 17 of the National Planning Policy Framework (NPPF) which states "...local and neighbourhood plans...should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency".

These comments are intended as positive suggestions to ensure the Plan is clear and effective for the purposes of assessing planning applications, achieves sustainable development and is consistent with all basic conditions. The Council has previously provided comments on a number of iterations of the Plan, including the pre-submission version, and we note that the submission draft Plan addresses many of these previous comments.

| Reference       | Comment   | Reason   |
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| Para. 3.7a      | Recommend replacing 'Neighbourhood Plan' with 'Appendix 2'.   | For clarity and consistency if supporting text specifically referred to Appendix 2 rather than the Neighbourhood Plan. This would improve clarity for decision making and ensure conformity with paragraph 17 of the NPPF.   |
| Para. 3.7 d     | Recommend that this criterion asks applicants to set out their reasons for the proposed massing and elevational elements regardless of scale.                               | As presently worded, this suggests that proposals only need to be justified if they are "larger" or "smaller" than surrounding buildings and appears to exclude schemes which are the same or similar. We assume this is unintended. This would improve clarity for decision making and ensure conformity with paragraph 17 of the NPPF. |
| Para. 3.7 d & h | Recommend that references to 'building' are replaced with 'the 'proposal' (as per criteria b. and g.) or 'development' to make the policy clearer and easier to understand. | The references to 'building' could be confusing as there could be more than one building within a site and the term may be read as referring to standalone structures rather than, for example extensions.   |
| DH3 (3)         | Recommend that the policy includes considerations that may be applied by the Council when assessing the suitability of such developments.                                   | We support the intention behind this approach but concerns that this reads as a blanket restriction. It would be helpful if the criterion identified the considerations against which these proposals will be assessed.  |
| NE2 (3)         | Recommend that this criterion requires tree   | We agree this is something that should be encouraged in all developments where it is   |

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|                    | planting in major developments where site conditions allow. We note that encouragement of tree planting is also addressed by Policy NE4 criterion 1(b).  | possible to plant additional trees, however it is likely to be much harder to deliver on smaller, constrained sites and it is not likely to be reasonable, or viable, to expect applicants to plant trees in conjunction with householder extensions. As drafted the policy conflicts with paragraph 206 of the NPPF which states “planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. |
| NE2 (4)            | Recommend that the word “strictly” is deleted  | The word strictly is unnecessary as the policy’s objective will be met where veteran trees are protected.   |
| NE2 (4)            | Recommend that the “exceptional circumstances” (canopy reduction) are clarified in the supporting text.  | Without further explanation, the criterion will be difficult to apply when assessing planning applications contrary to the NPPF para. 17.   |
| NE3 (4)            | Recommend cross-reference in the supporting text to Camden Planning Guidance to explain when the Council will require biodiversity surveys (“subject to their scale and location...”)  | It is currently unclear in the plan the thresholds for when these surveys will be sought, contrary to the NPPF para. 17.  |
| NE3 (5)            | Recommend that reference to biodiversity corridors and historic tree lines is removed to allow the effect of proposals to be considered on a case-by-case basis. We also suggest moving this criterion to the Plan’s chapter on basements. | We support the proposal in relation to Veteran Trees.<br><br>Applying this policy to all biodiversity corridors and historic trees lines would be extremely onerous and would prevent sustainable development from being delivered, contrary to the NPPF, para, 16. The Plan does not set out sufficient justification for resisting basement development in these areas.   |
| NE4 (1c)           | Recommend replacing the criterion with wording that seeks the use of surfaces that will deliver gains in biodiversity.   | As worded, the criterion may not lead to an increase in biodiversity as “permeable surfaces” can include harder landscaping forms such as permeable paving.<br><br>The policy also needs to be flexible because biodiversity is one consideration that has to be taken into account in the planning process, alongside matters such as ground conditions, effectiveness and cost.   |
| Policy BA1 and BA2 |  | The Council appreciates that the control of basement development is an important issue for residents in Hampstead and other parts of the borough. In response, the Council has  |

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|                       |  | <p>developed a robust policy approach in its Local Plan supported by detailed supplementary guidance and based on expert evidence, within the context of the powers available to it under planning legislation and policy. The comments on the basement policies therefore relate to consistency with national planning policy and the Council's basement policy and are intended to ensure that the approach in the neighbourhood plan can successfully operate alongside the Council's approach.</p>  |
| <p>Para. 5.12 (a)</p> | <p>Recommend that the criterion is reworded so that these measurements are only sought where this can be justified according to a basement scheme's risk assessment.</p> | <p>It is unclear why this is necessary and should apply to all basement schemes or what the justification is for this approach. It does not allow an assessment of issues that would specifically relate to the proposed basement scheme. As a result, the approach is too onerous and not in line with para. 193 of the NPPF and contrary to the approach in the adopted Camden Local Plan.</p> <p>In the "Geological, Hydrogeological and Hydrological Study" undertaken for Camden (<a href="#">link to Arup Study</a>), it is presumed that a site-specific ground assessment is provided in almost all cases. The principle of impact assessment is that a staged process is followed with the appropriate scope of any investigation (i.e. depth and number of boreholes, type and duration of water monitoring) being informed by the screening study and the basement proposals. Prescriptive guidance runs counter to the Council's established principles of iterative assessment, as required by Local Plan policy A5 and Camden Planning Guidance.</p> <p>Guidance on the scope of a ground investigation is set out in the standard 'Eurocode 7' (the European Standard for design of geotechnical structures), which states that in competent strata (in Camden this could mean the Bagshot sand, river terrace gravel or London clay), samples should be obtained to a depth of 2 metres below the proposed foundation. It is possible there are cases where a lesser depth is sufficient for the impact to be correctly assessed.</p> |
| <p>Para. 5.12 (b)</p> | <p>Recommend that the criterion is reworded so that these measurements</p>   | <p>It is unclear why this would be required in all cases, particularly if the risk assessment has not found any groundwater risk. The approach</p>  |

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|                | are only sought where this can be justified according to a basement scheme's risk assessment.  | <p>does not allow an assessment of issues that would specifically relate to the proposed basement scheme. As a result, the approach is too onerous and not in line with para. 193 of the NPPF and contrary to the approach in the adopted Camden Local Plan.</p> <p>Whilst this may be required in some situations, the groundwater regime in much of the Borough is straightforward and can be assessed and mitigated against without the need for extensive monitoring. For example, where foundations bearing on the London Clay are being deepened to create a basement (a very common situation), the basement proposals have no bearing on the groundwater regime and contingency measures such as waterproofing and temporary dewatering can be designed without this regime of monitoring.</p> |
| Para. 5.12 (c) | Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged. | This is a duplication of Camden's existing policy and seeks the same things as the Council's 'Basement Impact Assessment' (BIA). This will be confusing to applicants and planning officers.   |
| Para. 5.12 (e) | Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged. | This is not sufficiently specific and will be difficult to apply for development management purposes. The Plan does not indicate what these documents might contain. This is contrary to paragraph 154 of the NPPF which states that "Only policies that provide a clear indication of how a decision maker should react to a development should be included in the plan". Moreover, the Council already requires information on flooding and hydrological issues to be provided in a BIA.   |
| Para. 5.12 (f) | Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged. | <p>"Identification of the location and distance of the property from areas identified as flood risk in the Strategic Flood Risk Assessment prepared for Camden by URS in July 2014."</p> <p>No evidence has been presented to justify why these are required in addition to the requirements of the Council's detailed and professionally developed methodology for assessing the impacts of basement schemes. It is also unclear whether these are intended to be included as part of Camden's BIA or as separate documents. These requirements are</p>   |

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|                |  | not considered to be “relevant, necessary and material” to all basement applications, contrary to paragraph 193 of the NPPF.  |
| Para. 5.12 (g) | Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.   | <p>“A cross section of ground geology should be reported and drawn through comprehensive cross sections, reports and graphs”.</p> <p>Camden Planning Guidance 4 (July 2015) requires a ‘conceptual ground model’ which should give a clear description of the ground and groundwater conditions and show how they relate to the basement proposals. In much of Camden, the ground and groundwater conditions are very straightforward (made ground over London clay or river terrace gravels over London clay) and ground levels vary little. Whilst cross-sections can be helpful in some cases, they should not be mandatory for all schemes.</p> |
| Para. 5.12 (h) | Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.   | This is already covered by Camden’s BIA process which requires hydrological modelling, where hydrological issues are identified as a risk. The Council requires, where identified as a risk, a conceptual ground model, which contains all the known geological (encompassing hydrological and hydrogeological as well as stratigraphic) information about the site and the physical processes which affect it. The ground model is an explanation of how the site works.   |
| Para. 5.12 (i) | Recommend that the criterion is deleted  | Planning policy cannot require a Schedule of Condition Survey for third party land or buildings; this is covered by the Party Wall Act. Because it relates to another legislative regime it cannot be dealt with through a planning policy.   |
| BA 2 (1)       | Recommend that the policy is reworded to clarify that Basement Construction Plans will only be required when the BIA has indicated one is necessary, as stated in para 5.14 of the neighbourhood plan. Basement Construction Plans should only be required when a need has been identified, not in all | <p>The criterion conflicts with the wording in para. 5.14 of the Neighbourhood Plan. While we support the latter, the criterion, if applied as worded, is too onerous and contrary to the NPPF, para. 193.</p> <p>It is unreasonable to require Basement Construction Plans on all schemes irrespective of their size and likely impact. These have only been found to be necessary in Camden on a small number of basement developments. Camden’s adopted policy is that “Basement Construction Plans may be required when a</p>   |

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|         | instances regardless of need.   | Basement Impact Assessment shows acceptable estimated effects but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring properties. If a Basement Construction Plan is required this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation. (Local Plan paragraph 6.127)   |
| BA2 (2) | Recommend that the criterion is deleted.  | These matters set out in Policy BA2 (2) are already covered by the Council's existing Basement Impact Assessment process as set out in the Camden Local Plan and supplementary guidance. The requirements in the neighbourhood plan introduce unnecessary duplication and confusion. The approach is contrary to paragraph 193 of the NPPF which states "Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question"  |
| BA2 (4) | Recommend that the criterion is restricted to the matters referred to in Camden Local Plan Policy A5. | <p>"All issues" is insufficiently precise and potentially too onerous, contrary to the NPPF, paragraph 193. "The fullest extent possible" is also open to interpretation. As a result, this could be difficult for development management officers to apply.</p> <p>To gain planning permission for a basement a developer needs to demonstrate to the Council that the proposal would not cause harm to neighbouring properties, the structural, ground, or water conditions of the area, the character and amenity of the area, the architectural character of the building, and the significance of heritage assets (Local Plan policy A5). These are the main relevant planning issues for basements, and they need to be resolved before a permission for basement development is granted. A developer can only secure a planning permission for basement development where these impacts have been demonstrated to the satisfaction of the Council, using appropriate evidence, in line with the</p> |

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|         |   | Local Plan policy, Camden Planning Guidance, and the ARUP methodology.  |
| BA2 (5) | Recommend that criterion states that the need to provide Basement Construction Plans is determined through the BIA process, in line with Camden's adopted Local Plan. The reference to Party Wall matters should be deleted as this cannot be addressed by planning policy. | The need to provide basement construction plans in accordance with the Council's policy is not dependent on whether a basement scheme has predicted levels of damage above Burland Level 0 (which is likely to result from any construction works, basement or otherwise). In any event it is not practical for the Council to request that basement construction plans require that Party Wall Agreements are in place before approving it. Party Wall matters are covered by other legislation and are therefore not a material consideration in planning matters.  |
| TT1 (1) | Recommend that the criterion states that the applicant will need to demonstrate that proposals will not have an adverse effect on local air quality. The supporting text should clarify that assessments will be sought in line with Camden Planning Guidance.              | <p>As worded the policy implies that a TA or TS would be needed even if there was likely to be one additional vehicle movement. This is contrary to the NPPF para. 193 which states: "Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question".</p> <p>A local justification for requiring this evidence in these circumstances has not been provided. We note that the policy wording recommended by the Health Check report did include a threshold.</p> <p>The criterion creates a degree of confusion. Air Quality Assessments focus on pollution issues but TAs/TSs and DSMPs do not. The latter address number of vehicle movements/'trips' and the impact of traffic on residential amenity.</p> |
| TT1 (3) | Recommend that the criterion states that the applicant will need to provide Construction Management Plans where appropriate. The supporting text should then clarify that assessments will be sought in line with Camden Planning Guidance                                  | <p>As worded the policy implies that a CMP would be needed even if there was likely to be one additional vehicle movement. This is contrary to the NPPF para. 193. A local justification for this approach is not provided.</p> <p>Camden Council currently seek these documents for major schemes and other applications where there are likely to be significant impacts, e.g. sites on narrow lanes or constrained sites. CMPs principally address impacts of construction traffic such as noise,</p>  |

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|         |   | vibration, obstruction of the highway etc. rather than air quality.   |
| TT2 (2) | Recommend “and charm” is deleted from the criterion.  | This is difficult to define or measure. For clarity and predictability in decision making in line with NPPF para 17 the term charm should be removed.   |
| TT2 (3) | Recommend that reference to speed limits is removed from the policy.  | Planning policies cannot deal with speed limits as this is covered by other legislation.  |
| TT2 (5) | Recommend that the reference to additional crossing points clarifies that this is subject to a need being generated and viability. The design of crossing should take into account the character of the area. References to aesthetics and being mindful of others should be removed. | <p>It would not be reasonable to expect all schemes to provide crossing points as these would be sought by the Council subject to the level of need arising from a proposed development and viability. The criterion is contrary to paragraph 204 of the NPPF which states that planning obligations should be directly related to a development.</p> <p>It is unclear what is meant by “aesthetic appeal” and no guidance is provided on how the potential tension between public safety and effect on an area’s aesthetics might be managed; road crossings have to conform to national standards for the purposes of safety and visibility. The approach is likely to be difficult to implement contrary to paragraph 17 of the NPPF.</p> <p>It is also not clear what measures might be required for users to “regard the street as a shared space”, or where this might be delivered. Shared surfaces are a particular type of highways scheme that involves removing separation between pedestrians and motorists (e.g. Exhibition Road, London). It is unclear whether this is what is being sought by the criterion. “Hence be mindful of others” cannot be assessed when considering a scheme.</p> |
| TT2 (6) | Recommend that the criterion is reworded to aid implementation. It should be focussed on minimising street clutter and where additional street furniture is required, this should be sympathetic to the streetscene. Reference to “width restrictions” should be removed.             | <p>This raises a similar issue in terms of how the potential tension between public safety and effect on an area’s aesthetics might be managed. The criterion could seek the minimisation of street clutter to improve permeability and legibility and where additional street furniture is necessary, this should be sympathetic to the character and heritage of the area.</p> <p>Width restrictions cannot be controlled through planning policy.</p>  |
| TT2 (7) | Recommend that the criterion should be subject  | It will only be appropriate to secure these measures for certain developments, i.e. where sufficient need arises from the proposed  |

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|          | to the needs generated by a scheme and viability.  | scheme. The approach conflicts with paragraph 73 of the NPPF “Ensuring viability and deliverability” and paragraph 204 which sets out the statutory tests that must be met where planning obligations are secured.  |
| TT3 (1a) | Recommend that references to care homes and medical establishments are removed. The policy should allow applicants the ability to submit evidence to the Council relating to the particular accessibility of their site/premises if they consider it is well served by public transport. | <p>The policy would be overly onerous in relation to medical uses and care homes as it would impose a blanket restriction on these uses in all but a small part of the neighbourhood area, i.e. where the PTAL rating is 5 or above. Consequently, it would not be possible to provide a new doctors surgery (or extension of an existing facility) or care home in most of the neighbourhood area. Doctors surgeries and care homes have different travel patterns and peaks compared to educational establishments. The policy is not supported by evidence to justify taking such an approach.</p> <p>We do, however, recognise there is a significant impact on Hampstead relating to the school run and the issues are identified in paragraph 4.33 of the adopted Camden Local Plan and therefore we would support this part of the policy.</p> <p>PTAL levels are arranged according to a grid and cannot accurately predict accessibility for every site/premises. Within each grid square, actual accessibility can vary. The policy should allow applicants to submit additional supporting information to the Council so the accessibility of the site can be clarified, recognising that PTAL has some limitations.</p> |
| TT3 (1b) | Recommend that the policy has a presumption of steering development towards PTAL5 which generates the number of trips mentioned but retains flexibility for other sites when applicants are able to successfully demonstrate that the impacts can be mitigated.                          | We support the intent as the Council already seeks to direct development to sites proportionate to the numbers of trips a scheme generates. However, we have a concern about its implementation as worded. PTAL 5 or above covers only a minority of the designated Hampstead Town Centre. The rest of the Town Centre is within PTAL 3 and 4. The policy would effectively be applying a different approach to uses within different parts of the designated Hampstead Town Centre. Town centres are by their nature suitable in principle for new retail development. Paragraph 9.3 of the adopted Camden Local Plan states that the Council will ensure that “such development takes place in appropriate locations, having regard to the distribution of future retail growth and the hierarchy of centres established by this policy”.   |

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| TT3 (2)       | Recommend that the criterion is reworded as it would not be realistic to expect applicants to undertake these measures. It would also not be reasonable to restrict medical uses or care homes to areas within PTAL 5. | If this criterion is applied with criterion 1 as worded, it could make potential developments unviable as the cost of elevating a site from lower PTAL levels may be prohibitive and therefore, Criterion 2 is unlikely to be effective. The approach conflicts with paragraph 73 of the NPPF “Ensuring viability and deliverability” and paragraph 204 which sets out the statutory tests that must be met where planning obligations are secured. For example, the most accessible locations in London are in proximity to London Underground stations which it would not be possible for developments to provide.   |
| TT4           | Recommend that references to “apartments” is replaced by residential development   | The policy refers to “all residential developments” and “apartments”. We believe it is intended to apply to all residential developments and this should be used consistently throughout in line with the NPPF, para. 17.  |
| TT4 (1 & 2)   | Recommend that the policy requires cycle parking to meet these characteristics unless the applicant can demonstrate to the Council’s satisfaction that there are circumstances why it is not appropriate or possible.  | <p>“within the curtilage of the building” &amp; “under cover” and “step-free access” – while these are desirable, it will not be possible to secure these in every case. As worded, the approach is too restrictive and the Council would have to resist new cycle parking which did not meet these requirements, potentially reducing the amount of cycle parking that can be delivered. Due to the range of different sites, buildings and cycle users, it would not be reasonable to impose any of these requirements to every scheme.</p> <p>The Council's Camden Planning Guidance on Transport (<a href="#">link to Camden Planning Guidance</a>) already provides detailed advice on cycle parking facilities. It states that cycle parking should be provided off-street, within the boundary of the site. It also states that cycle parking needs to be accessible and secure. The full details are set out in paragraph 9.8.</p> |
| TT4 a. b. & c | Recommend that the policy is brought into line with the London Plan to ensure that there is no under-provision of cycle parking.   | The approach has the effect of simplifying the approach set out in the London Plan cycle parking standards (Table 6.3) and is likely to reduce the overall amount of cycle parking that can be secured by the Council, contrary to the Neighbourhood Plan’s objectives. The London Plan seeks the provision of both <i>short stay</i> and <i>long stay</i> cycle parking spaces, which means that together the overall number of spaces sought may be greater than the Neighbourhood Plan requires.  |
| EC1 (4)       | Recommend that the policy and supporting text is reworded to clarify that  | The policy refers to “businesses located directly above shops” and the supporting text refers to the importance of retaining “ancillary  |

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|         | the policy seeks the retention of both retail and office floorspace.   | space, such as storage or workrooms". It is believed that the intention of the policy is to protect any Class A or B1a uses at first floor level or above.  |
| HC1 (2) | Recommend that the policy allows flexibility for the amalgamation of dwellings or a change of use where the accommodation is substandard. The supporting text should clarify what constitutes a 'small' dwelling in terms of floorspace. | There appears to be overlap / duplication between criteria a. and b. as both seek to resist the loss of small self-contained dwellings, which may cause confusion. Also, the policy approach does not allow any flexibility, for example where existing small dwellings do not provide satisfactory accommodation, e.g. poor outlook or excessively small. The policy does not provide guidance on what constitutes a small dwelling – there are dwellings with 1 or 2 bedrooms that are significant in terms of their floorspace.                                      |
| HC2 (3) | Recommend that the policy acknowledges the continuing viability of the facility to ensure the approach is in line with Policy C2 of the adopted Camden Local Plan  | It is not possible to use a planning policy to require the Council or another body to provide a community service if that service is no longer viable. As worded, the approach is not in conformity with part g (ii) Policy A2 of the adopted Camden Local Plan that states existing community facilities are retained...unless "the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area". Viability should therefore be acknowledged as a consideration. |
| HC3 (1) | Recommend that the plan is clearer about how the improvements might be implemented through the planning process and in particular, what might be improved in these spaces.   | This criterion could potentially be misconstrued by giving the impression that development of the named spaces themselves will be supported to deliver environmental improvements. The policy approach is vague as it does not clarify the existing environmental qualities of these spaces and how each one might be improved. It is understood these spaces have been identified as the potential beneficiaries for CIL funding or Section 106 planning obligations.  |

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Date: 13<sup>th</sup> December 2017

Dear Sirs,

**RE: Response to Local Green Spaces Justification (Draft) Hampstead  
Neighbourhood Plan 2018-2033 – Land at Branch Hill Allotments Open Space  
and Branch Hill House**

We submit this representation on behalf of Camden Council as the freehold owner of Branch Hill Allotments Open Space and Branch Hill House

The Asset Strategy and Valuation Team acting on behalf of the Council, is marketing Branch Hill House for sale on the open market and in accordance with a decision by the Council's Cabinet to dispose of the property shown in Appendix 7.

A small section of land within the curtilage of Branch Hill House as shown in Appendix 2 is designated as open space which we contend is an error in the original designation, if the designation is not corrected, and the land excluded from the sale, it will be landlocked and incapable of beneficial use. Our response is as follows: -

1. Branch Hill Allotments are designated as open space, see Appendix 1 for the boundary detail at the point of interest. These are adjacent to Branch Hill House which is private property Appendix 7 shows the entirety of the Branch Hill House site.
2. The Southern boundary of the Branch Hill House site abuts the allotment open space. The two sites are on different levels and separated by a combination of metal railings, brick walls and retaining walls, Appendix 4 and 5 shows the location of the Land at a

higher level than that of the Allotments Below. There is a clear demarcation on site between Branch Hill House and the allotment open space site.

3. The present designation of the allotment open space includes a small section of land within the curtilage of Branch Hill House, which is immediately to the left of the large entrance gate to Branch Hill, see Appendix 2. This section of land has a historic brick wall and railings separating it from the allotment below see Appendix 6. Additionally, it is on a higher level from the allotment open space and above a retaining wall.
4. There is clear separation of this land from the allotment open space additionally, the land in question is bounded by a public footpath to the north and a brick boundary to the south rendering it incapable of any ancillary use to the allotment space.
5. Because of the boundary arrangements, the land in question is incapable of use as part of the allotment open space.
6. Paragraph 77 of the National Planning Policy Framework (NPPF) states "*The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife...*"
7. Due to the boundary arrangements including its proximity to the footpath, the subject land is physically separate from the Branch Hill allotments open space and fails to have any recreational value on its own, ancillary use to the allotment open space or tranquillity or richness of its wildlife as per the NPPF .
8. The (Draft) Hampstead Neighbourhood Plan 2018-2033 states that "All LGSs for designation are consistent with Camden's Local Plan policies for sustainable development" and are not within development sites. However, the land in question is part of a private property that is expected to be developed shortly and is for sale as at 11<sup>th</sup> December 2017 as such, the designation would hinder any development proposed at Branch Hill House.
9. The Land which is part of Branch Hill House but designated as Branch Hill Open Space Allotment is incapable of use as designated or ancillary thereto, it has historically been fenced off from the allotment site and occupies an elevated position part of the curtilage

of Branch Hill House. It is apparent from an inspection of the site that the section of land shown in Appendix 2 was included as part of the Branch Hill Allotment Open Space in error which has only come to light as plans to sell the Branch Hill Sit have developed. It is fair to state that this Land has never been used as or ancillary to the allotments.

We therefore contend that the section of land referred to above should not be confirmed as Local Green Space.

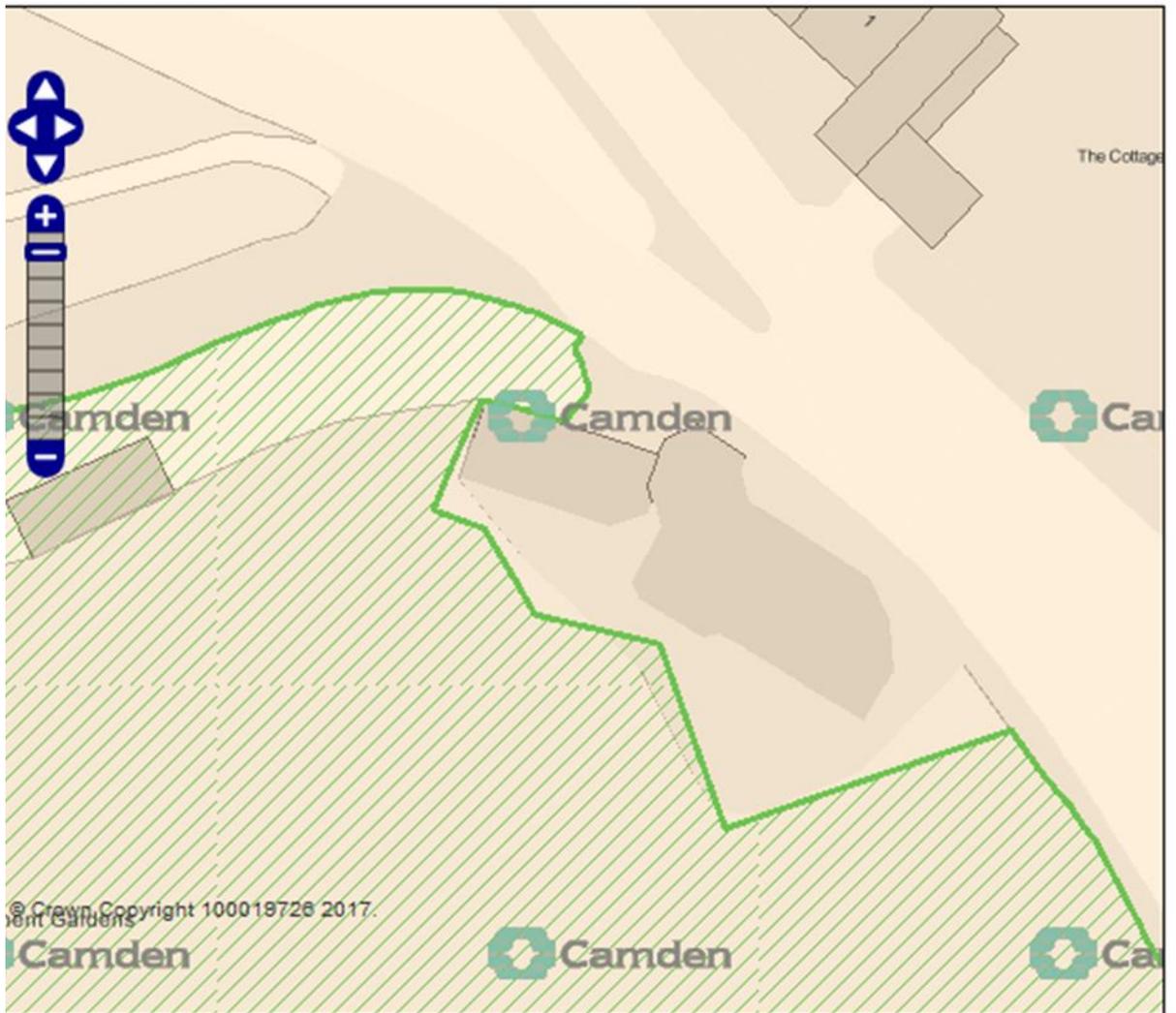
Yours faithfully,



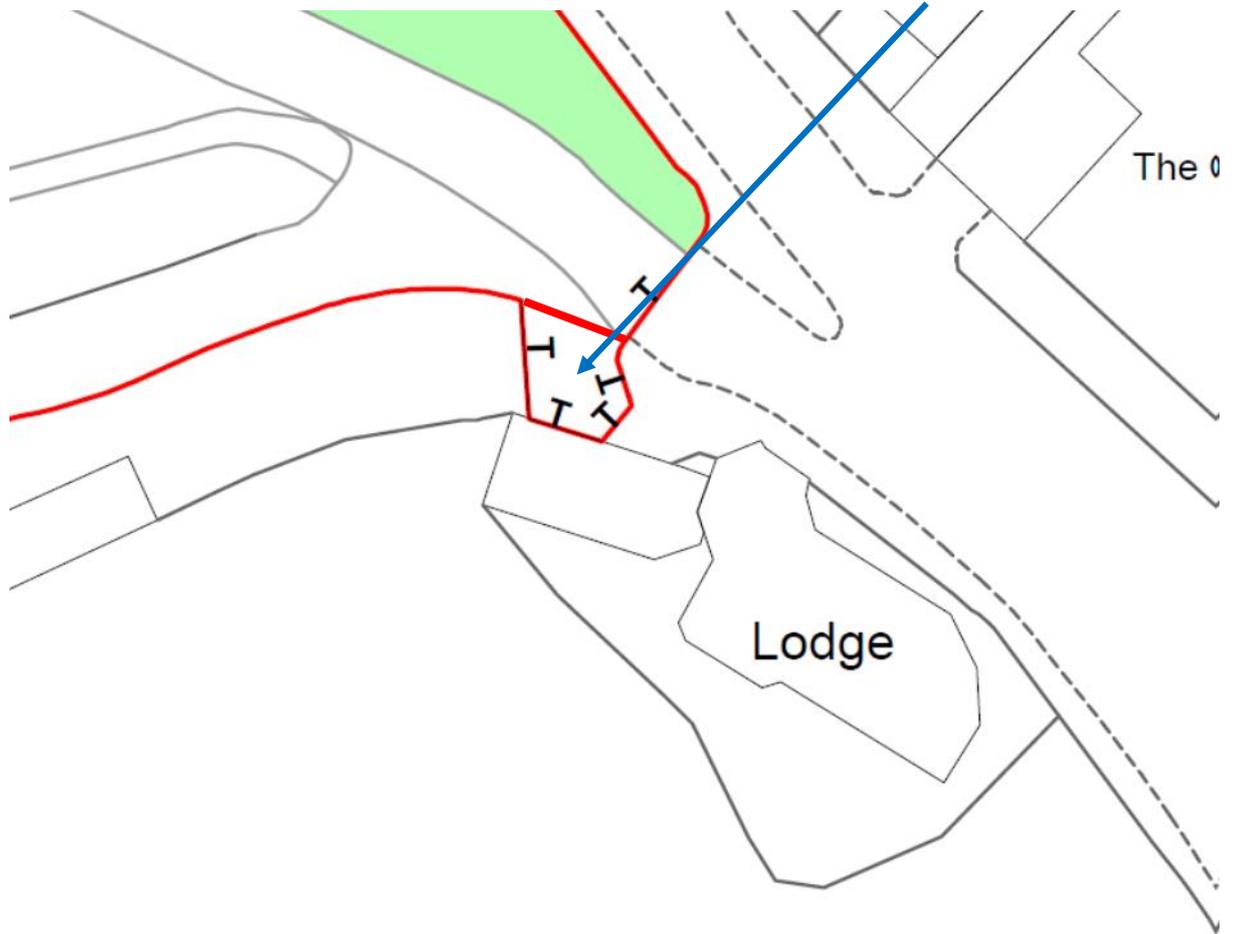
Rajvinder Matharu BSc (Hons) MRICS  
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## Appendices

1. Present designation of open space shown hatched green:-



2. Section Land edged red within curtilage of Branch Hill House boundary



4. Location of Land showing higher level as seen from the Branch Hill Open Space Allotments



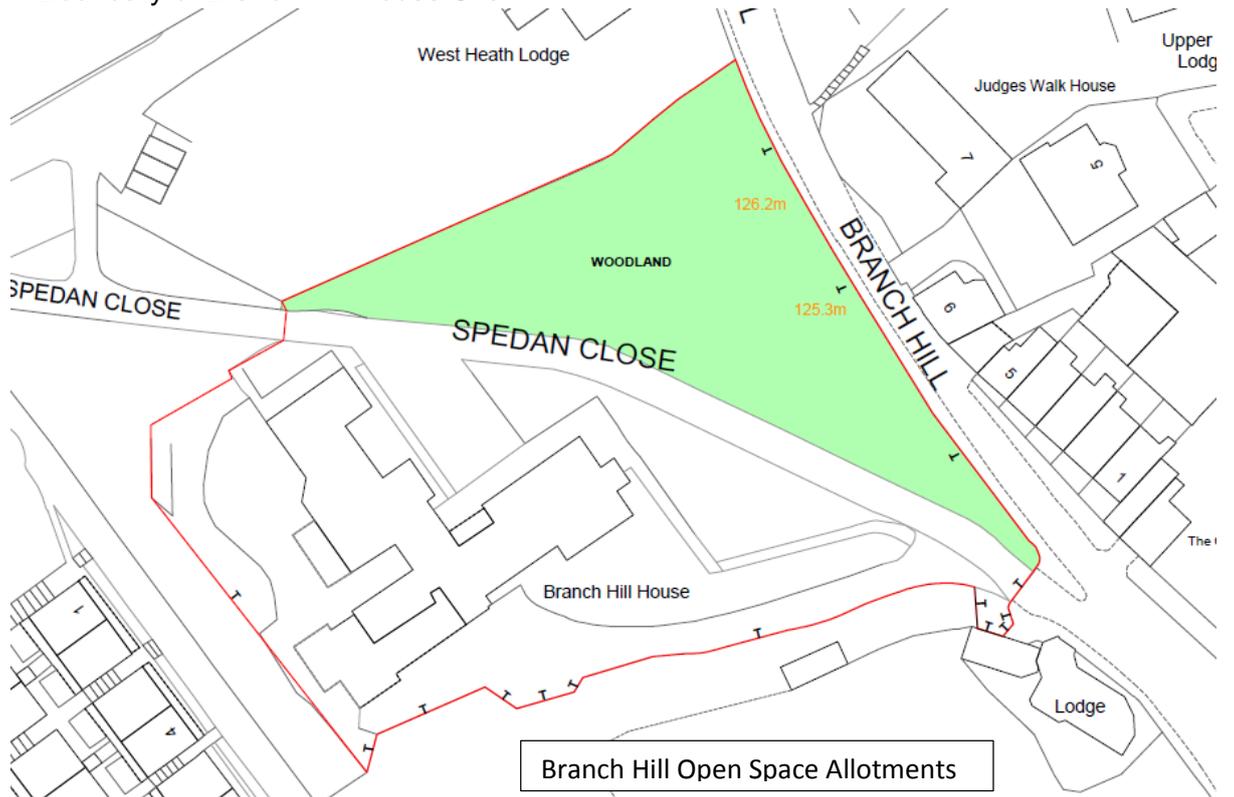
5. Looking down into Branch Hill Open Space Allotments from the Land



6. 'View from inside the small section of Land designated Open Space within Branch Hill House site boundary also showing boundary features



7. Boundary of Branch Hill House Site



By email : [Planningpolicy@camden.gov.uk](mailto:Planningpolicy@camden.gov.uk)

Strategic Planning and Implementation Team  
London Borough of Camden

Our ref. PL00209042

Telephone 020 7973 3717

6 December 2017

Dear Camden Planning Policy Team

### **Hampstead Neighbourhood Plan Proposal**

Thank you for consulting Historic England in respect of the submitted Draft Hampstead 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 Historic England, 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 Historic England remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

Historic England provided comments in respect of the proposed boundary to yourselves on the Neighbourhood Forum Boundary on 17 June 2014. T

We do not appear to have received the SEA Screening consultation of Jan 2017 but can confirm agreement with the Council's assessment that the proposed Plan does not raise environmental concerns in respect of historic environment impacts sufficient to trigger the requirement for SEA. We agree that the policies set out in the Draft Plan are proportionate and in conformity with National Policy and will result in positive impacts in respect of the preservation and enhancement of the historic environment.



We do not therefore wish to make detailed comments regarding the Neighbourhood Plan. We can however offer the following minor comments in respect of the implications for the historic environment.

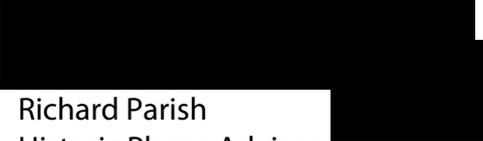
### **Main considerations**

The plan is well written, accurate and accessible and is likely to result in positive impacts on both designated and undesignated heritage assets. The proposed policies reflect the policies in the NPPF and the enhanced policies on basement construction and subterranean development are welcome in light of the specific geological constraints of the Hampstead Highgate Ridge.

Our principal observations on the boundary were in respect of the proposed Church Row & Perrin's Walk Forum falling within the Hampstead Neighbourhood Forum. However, we note that both Forums have acknowledged that Church Row and Perrin's Walk form a distinct character area and, as such, there is no proposed conflict in terms of boundaries. We do not therefore consider that the Draft Plan raises specific cross boundary policy concerns.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.

Yours faithfully

  
Richard Parish  
Historic Places Adviser



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Correspondence or information which you send us may therefore become publicly available.



## PlanningPolicy

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**From:** McLaughlin Gavin <GavinMcLaughlin@tfl.gov.uk>  
**Sent:** 13 December 2017 17:24  
**To:** Planning; PlanningPolicy  
**Subject:** Hampstead Neighbourhood Plan - TfL Planning comments

Dear Hampstead Neighbourhood Forum,

### HAMPSTEAD NEIGHBOURHOOD PLAN

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.*

Thanks for consulting TfL Planning on the draft version of the Hampstead Neighbourhood Plan. The draft new London Plan was launched for consultation on 1st December 2017. This document is now a material consideration in determining applications and in assessing general conformity of emerging local and neighbourhood plan policy. As such, TfL will have regard to the new Plan, inter alia, when assessing planning applications and local policy.

For your information, I made a Site Visit to the plan area on Saturday 9<sup>th</sup> December 2017.

On behalf of TfL Planning, I submit the following comments:

- Para 3.8 on 'Permeability' should include a reference to cycling as well as walking, and potentially also be moved upwards into the policy section rather than only being supportive text. Good cycling and walking access are essential components of high quality urban design. However Policy DH1 (Design) seems to focus exclusively on built design as it does not refer the importance of relating new buildings to local walking, cycling and public transport networks.

This is necessary in order to support the ambitious targets of the new Mayor's Transport Strategy (MTS), in particular MTS Policy 1: the Mayor's aim is that, by 2041, all Londoners do at least the 20 minutes of active travel they need to stay healthy each day and for 80% of journeys in London to be made by sustainable modes – public transport, walking and cycling – by 2041. Acknowledgement of the interrelationships between transport accessibility, active travel promotion and urban design is essential to help achieve these aims, as also reflected in Policies GG2, GG3, D1, D7, T1 and T2 of the new draft London Plan.

- Policy DH3 (Urban realm) may benefit from a reference to TfL Streetscape Guidance (available from <http://content.tfl.gov.uk/streetscape-guidance-.pdf>). Walking and cycling permeability could also be dealt with here instead of DH1 if preferred. Para 3.21 on reducing street clutter is supported. However the emphasis on 'visual street clutter' is somewhat narrow. A more important benefit of reducing street clutter is to create more welcoming and usable street environments for cyclists and pedestrians, including those with buggies, in wheelchairs or with visual impairments. Para 3.22 refers to a 2015 draft of the TfL Streetscape Guidance. However the Streetscape Guidance is now in its Third Edition, which was published in 2017.
- Policy BA2 should make explicit reference to London Underground (LU) tunnels and other infrastructure in the second section on required information for Basement Construction Plans. TfL reminds the Forum and Council that any planning applications which interact or conflict with our LU infrastructure should be subject to planning conditions obliging written sign-off by TfL LU on all construction proposals and the construction methodology. We can advise whether this requirement applies on a development by development basis.

- In Policy BA3 part 2, the reference to the safety of cyclists and pedestrians is very welcome. The Forum and Council may find the latest TfL guidance on Construction Management Plans useful, in particular the spreadsheet tool which can be used to estimate the frequency of vehicle trips likely at various stages across a construction programme (available from <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>).
- Para 5.24's recommendation that work on basements should be limited to 8-6pm on Mondays to Fridays only and High Impact activities restricted to 9am-12 midday and 2-5.30pm on weekdays is clearly designed to reduce amenity impacts on local people (e.g. noise, vibration). However it fails to consider the congestion and safety impacts of construction traffic using the strategic and indeed local road network during peak periods (broadly, 8-10am and 4-6pm weekdays with a 3pm start around schools), which can be alleviated significantly by promoting interpeak deliveries and waste away and further still by weekend and early morning or evening servicing of construction sites. With careful site management this can often be achieved with minimal disruption. TfL Planning would therefore encourage the Forum and Council to consider encouraging more flexible hours of work related to site location and the proposal itself and in any case allowing for full interpeak activity in the document.
- Para 6.3 notes the strength of local feeling on matters of congestion and pollution. It is important to note that a highly effective way of tackling those issues is the promotion of alternative sustainable and active modes of transport. The Forum may wish to highlight that point prominently and explicitly reference the new London Plan (draft available from <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>).
- Para 6.6 part B states:

“b. A public transport accessibility level (PTAL) score over 5 (slightly below the borough average of 5.6) is defined as the minimum level for the sites of large developments, schools and educational institutions in the Plan Area.”

TfL Planning objects to this policy as it would not conform with the new London Plan nor the development plan for the area ( the 2015 London Plan and the Camden Local Plan) , in particular West Hampstead's classification in Table A1.1 as having 'Medium' residential growth potential. Furthermore, PTAL does not take into account public transport accessible within short cycling distances ( as well as walking) or any journeys made solely by walking or cycling. The policy put forward would effectively prevent large scale development, schools and educational institutions across the plan area without significant investment in new bus, rail or LU services. It is therefore too restrictive given the new Mayoral emphasis on promoting development within 800m of stations and town centres and more generally in inner London boroughs such as Camden, to help tackle London's acute housing need and to enable necessary infrastructure such as schools to be provided to serve local communities..

The mean averaging of PTAL across a wide area such as Hampstead or Camden is also fundamentally flawed, as the PTAL calculation methodology relies on walk access thresholds which differ from point to point across geographic space. As a result, suggesting that a borough has an 'average' PTAL does not make sense.

TfL Planning considers this policy does not conform with the current London Plan, NPPF or Camden's local plan, as it fails to take account of Camden's site allocations, the NPPF definition of sustainable development (for which there is a presumption in favour) and the housing supply and density policies of the current London Plan (see policies 3.4, 3.7, and Table 3.2).

However Part C of the same policy is supported by TfL Planning. The Forum and Council may wish to add a link to the TfL Transport Assessment guidance website, where new guidance will be uploaded in 2018 to support the new London Plan (see <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>).

- In response to Para 6.7's statement on community concern about the wide catchment areas of some local schools resulting in high volumes of traffic coming from outside the Plan Area, TfL Planning would point out

that the catchment areas of schools are outside the remit of a neighbourhood plan. It may instead be worth highlighting the need for sustainable and active travel planning by local schools. The TfL schools travel planning programme, STARS, replaces 13 million miles' worth of car journeys each year with walking, cycling and scooting (see <https://stars.tfl.gov.uk/>). The Forum and Council should encourage local schools to sign up to the STARS scheme and promote sustainable and active travel amongst pupils and staff in order to achieve a Bronze, Silver or Gold STARS accreditation, as this would help to reduce car traffic in the plan area. Improvement of wayfinding signage by the introduction and expansion of Legible London (<https://tfl.gov.uk/info-for/boroughs/legible-london>) into the plan area could also help encourage more linked trips to schools on foot from local LU, Overground and bus stops/stations. Likewise the Neighbourhood Forum could support in the Plan improvements and extensions to the walking and cycling network in the area which would encourage local people to make the school runs on foot or cycle rather than by car.

- Para 6.13 is interesting feedback from the Forum and has been noted by TfL Planning in advance of publication of our own new TfL Transport Assessment guidance to accompany the new London Plan in 2018. The majority of issues highlighted as not required by Camden Council TA guidance are generally dealt with in Deliveries and Servicing Plans (DSPs), which the Council can secure by a planning condition discharged in consultation with relevant stakeholders and thereafter becoming enforceable by the local authority across the life of the development should the approved servicing approach and practices in the DSP not be followed.

TfL guidance on DSPs is available here: <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

- Para 6.16's statement that where development which may generate new car trips is consented in the plan area, "it may be necessary to offset any increase through other measures so that a development does not lead to an overall increase in traffic volumes within the Plan Area", is strongly supported by TfL Planning. Effective measures can include DSPs, CLPs and Travel Plans secured by condition and/or in Section 106 agreements, where appropriate with a financial bond payable to the Council should the share of car trips generated by the development stay the same or increase in the early years of occupation. Furthermore a car free development should generate very little traffic and thus should be promoted at the planning stage.

Funding for more specific sustainable and active travel promotion measures targeting new residents or other users can also be secured, for example giveaways of free Oyster credit, cycle purchase vouchers and the Cycle to Work scheme, Cycle Hire memberships and events and initiatives such as personalised travel planning, walk and/or cycle to work weeks, rewards (e.g. free breakfast) for switching away from cars, cycle training, guided walks, marketing of local public transport, and physical improvements such as cycle parking and traffic calming measures in the vicinity of a development site (although these should be secured up-front at planning stage wherever possible). The above is additional to Travel Plans for school mentioned above and the TfL workplace initiatives to which I have also already referred

TfL will be issuing new Travel Planning guidance by late 2018 or early 2019, also linked to adoption of the new London Plan, as Policy T4 part B states: "Travel plans, parking design and management plans, construction logistics plans and delivery and servicing plans will be required in accordance with relevant Transport for London guidance." The current London Plan similarly states (Policy 6.3 part C) that "Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans."

In line with the above comments, Para 6.17 is also strongly supported by TfL Planning.

- TfL Planning requests Policy TT1 (Traffic Volumes and Vehicle Size (part B) is rewritten to specify that a TfL-approved methodology should always be used for monitoring surveys, as we wish to create a London-wide mode shift database and the use of diverse inconsistent and sometimes self-reported survey methodologies across the capital currently hinders our efforts. Data sharing of travel plan monitoring survey results is

essential for strategic planning purposes. This will have benefits to the Forum in creating a body of consistent data which can be used for planning and monitoring.

- Para 6.20's statement that "Transport Assessments, Transport Statements and Delivery & Servicing Management Plans (DSMPs), while being essential planning tools, should not be burdensome and need only be proportionate to the scale of development" is accurate and accepted. However TfL Planning would add that it is best practice if the required content, scope and key issues to be covered by any such document are discussed and agreed at preapplication stage. This helps to avoid abortive work by applicants and planning officers, as well as the inclusion of unnecessary elements in TAs eventually submitted with planning applications or documents which require significant revision post submission..
- TfL Planning objects to Para 6.24's clarification on additional motor vehicle use, stating that paragraph 1 of Policy TT1 will not apply if existing premises are refurbished or redeveloped in a way which does not increase motor vehicle use or pollution.

Policy T6 (Car parking) of the draft new London Plan states clearly at part I that "Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy."

Therefore any refurbished or redeveloped premise will need to conform with new parking standards once the new London Plan is published (adopted), and also Camden Council's own stringent local car-free planning policy. In the vast majority of cases they must therefore provide no car parking once refurbished or redeveloped.

- Furthermore, as all new developments in Camden will be car-free for the foreseeable future, it is very difficult to argue that any will generate significant amounts of new car traffic. As a result, in order to reduce car traffic and travel in the plan area, a far more useful approach would be to consider filtered permeability, timed access, and car free zones around schools. Such measures would be more likely to encourage mode shift away from cars, as they would target existing residents and visitors to Hampstead who are causing the area's current traffic problems, not new development which should not with the car free policy.
- Para 6.27's promotion of "Downgrading the A502 London Distributor Road given its unsuitability for heavy vehicles north of Hampstead village" is not supported by TfL Planning due to its important role as a bus route served by the 46, 268 and N5 services. It should be removed from the plan in conformity with current London Plan policy 6.7 (Better Streets and Surface Transport).
- Policy TT2 (Pedestrian Environments) is strongly supported by TfL in conformity with the Healthy Streets Approach promoted in the new draft London Plan (see policies GG3 and T2) and also policy 7.5 (Public Realm) of the current London Plan.
- Paras 6.34-6.35 on Zebra crossings are tentatively supported by TfL Planning to encourage more walking. However it is important to emphasise that any new pedestrian crossings introduced in the plan area must be subject to traffic modelling analysis to ensure they do not create unacceptable levels of bus journey time delay. Therefore TfL may oppose specific zebra crossing proposals on a case by case basis depending on local streetscape and traffic conditions, and operational requirements for the ongoing efficient, economical and effective management of the public transport network to serve Londoners and as a key element of sustainable and active travel to support public transport, walking and cycling and encourage mode shift from the car.
- Para 6.36 on community support for a potential "Shared Use Road Scheme" at South End Green is noted by TfL Planning. For inspiration, the Forum may wish to consult Sections 3.3 (Enhancing a Cultural Heart), 3.4 (Changing the purpose of a street) and 3.5 (Rebalancing user needs) of the TfL Streetscape Guidance (available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>), which include case studies that are particularly relevant to the local context. Also, Better Streets Delivered 2, a collection of case studies recently published by TfL & Urban Design London (<https://tfl.gov.uk/cdn/static/cms/documents/better-streets-delivered-2.pdf>), in particular the Bexleyheath

Town Centre case study (p. 48).

As with new pedestrian crossings, TfL reminds the Council and Forum that bus operations must not be worsened by any new streetscape proposals in the plan area. Furthermore any proposed changes to the local street environment must accord with the new TfL Healthy Streets approach and be subject to the recently published Healthy Streets Check for Designers (see <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>).

- Finally, para 6.39 notes the percentage of people in Hampstead Town ward living in areas with a PTAL score of 3 or less is 70% of the total population, compared to only 29% across the borough as a whole and describes Hampstead ward's PTAL as "a relatively low PTAL score at 4.0". It is worth stressing to the Forum and Council here that TfL opposes the characterisation in the document of a PTAL 4 as low, this PTAL has always been described as good and furthermore the new draft London Plan policy is for housing to be delivered at optimum densities in close proximity to stations and town centres, including areas of PTALs 3-6 (see Policy D6 on Optimising Housing Density, and also Policy GG2 on Making Best Use Of Land). We would therefore be interested to understand from the Forum what proportionate of Hampstead residents live in areas of PTAL 0-2, as referring to the percentage in PTAL '3 or less' may have given a false impression that 70% of local people live in areas of low public transport accessibility when in fact the majority do not.

Thanks,

**Gavin McLaughlin**  
**Planner, TfL Planning, Transport for London**

M: 07711 345112 T: 020 3054 7027 Ext: 87027 E: [GavinMcLaughlin@TfL.gov.uk](mailto:GavinMcLaughlin@TfL.gov.uk)

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For more information regarding the TfL Borough Planning team and TfL's *Transport Assessment Best Practice Guidance* please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance> and for pre-application advice please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice>.

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**Vickers, Ben**

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**From:** [REDACTED]  
**Sent:** 21 November 2017 10:58  
**To:** PlanningPolicy  
**Subject:** Hampstead Neighbourhood Plan

Dear Sir/Madame,

On behalf of the local Community Land Trust I wish to make the following comments regarding the Housing section of the above Plan.

The current wording of Policy HC1 is as follows:

*Policy HC1: Housing Mix*

- A increasing the provision of social-affordable housing*
- B provision of large housing units for social-affordable rental*
- C provision of small housing units for market sale*

Comment/recommendation:

The wording related to affordable housing type is too general and will benefit from further clarification - section A - and expansion - adding Section D. See below:

A include social-affordable, intermediate-affordable and community-led housing

D provision of small housing units as intermediate affordable

Sanya Polescuk

[REDACTED]

[REDACTED]

Strategic Planning and Implementation  
Regeneration and Planning  
London Borough of Camden  
Judd Street  
London WC1H9JE



11<sup>th</sup> December 2017

Dear Sir/Madam

**Comments on Hampstead Neighbourhood Plan**

We have the following comments on the Draft Neighbourhood Plan:-

**Page 16 Map 3 Character areas 19<sup>th</sup> C expansion and appendix 2**

This map and appendix 2 describes Downshire Hill and Keats Grove as part of the 19C extension of the village and groups it with streets such as Pilgrims Lane, Carlingford Road etc which have predominately Victorian housing. This is not correct. Of the 75 homes in Downshire Hill and Keats Grove approximately 45 or so are Georgian and listed grade 2. There is also a grade 1 listed church built at the same time as the majority of houses. Pevsner writes “*Downshire Hill and Keats Grove are two of the most attractive streets in Hampstead..... Downshire Hill is especially characteristic of the stuccoed architecture of c 1820 and the delightful thing is the preservation of so much yet no uniformity.*”

If diverse areas are going to be described in the Neighbourhood Plan it would be best if the description is correct and an area to include Downshire Hill and Keats Grove should be introduced as otherwise incorrect policies may be devised. Please correct.

**Page 43 Policy BA1 Local Requirements for Basement Impact assessments (BIA)**

**Section 2 page 43** states that all BIA proposals aim for Burland scale 1 “very slight” damage to neighbours with no planning application approved with greater levels of damage unless outweighed by substantial public benefit. This is supported.

It is suggested that such substantial benefit needs to be illustrated by examples such as the extension of an underground station or sewer. It should be stated that replacement of a single home with a new home would not be sufficient benefit to allow damage greater than Burland Scale 1.

**Section 4 page 45** states that all issues related to the BIA must be resolved before planning is granted. This should be clarified to say all issues relating to the BIA, to the extent that it can be demonstrated that damage can be restricted to Burland Scale 1 or less, must be resolved before planning is granted.

**Section 5 Page 45.** This states that a section 106 must be entered into with the obligation that the Basement Construction Plan will not be approved by the council until the Party Wall agreements have been signed. (unless proposed damage is zero). This is supported as it does not conflict with planning, which of course lies with the Council, but merely support residents in their quest not to have their homes excessively damaged by neighbouring works. It gives the Council and residents equal ranking in the approving of a construction plan, a plan that impacts the structural integrity of the neighbour's home.

It should be noted that, not to have such a provision would mean that the Council would approve the Basement Construction plan without sight of an agreed PWA and hence fundamentally undermine the resident's ability to hold the developer to account as the BCP would already have been approved by the Council. As such, changes to the BCP by the resident would be extremely difficult to pursue as the developer would just say the Council have approved it.

It would be disingenuous to say that making the signed PWA a condition of approving the BCP is a Party wall matter and hence covered by non-planning legislation. The Council agreeing a BCP without a signed PWA fundamentally undermines the resident's ability to hold the developer to account and make the developer do no more than what planning has allowed them as far as damage is concerned.

It should be noted that if a neighbour is unreasonable in signing the PWA, the party wall legislation has sufficient provisions to allow the developer to proceed on a strictly defined timeline.

### **Page 65 Vision for South End Green**

We do not agree that a shared use scheme at South End Green would be welcome as such a scheme would inevitably have knock on effects as far as diverting substantial amounts of traffic down neighbouring streets such as Downshire Hill. It is suggested that the vision of such a shared use scheme be caveated with the comment that such a vision is proposed as long as it can be shown that there will be no diversion of traffic to other side streets.

S D Ainger

11<sup>th</sup> December 2017

Chair Downshire Hill Residents' Association



Sent by email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

[thameswaterplanningpolicy@savills.com](mailto:thameswaterplanningpolicy@savills.com)

 0118 9520 503

07 December 2017

## London Borough of Camden – Hampstead Neighbourhood Plan – Submission Draft

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the London Borough of Camden and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the draft Neighbourhood Plan:

### General Comments

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).**

### Omission of a Policy on Water and Wastewater Infrastructure

Thames Water request that a specific policy on Water and Wastewater Infrastructure be included within the Neighbourhood Plan.

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.

It is therefore important that the Hampstead Neighborhood Plan considers the net increase in water and waste water demand to serve proposed developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

Thames Water therefore recommend that developers engage with them 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 network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

Thames Water consider that to accord with the NPPF/NPPG and the above, that there should be a section on water supply and wastewater/sewerage infrastructure in the Neighbourhood Plan which should make reference to the following:

#### **“Wastewater & Sewerage Infrastructure**

***Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure.***

***Drainage on the site must maintain separation of foul and surface flows.***

***Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. ”***

#### **Example of similar policies in other Neighbourhood Plans**

The Kentish Town Neighborhood Plan included the following text which Thames Water support.

***“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/558.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: 0800 009 3921;*

*Or by email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)*

### **Sustainable Urban Drainage Systems (SuDS)**

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SUDS not only help to mitigate flooding, they can also help to:

- improve water quality
- provide opportunities for water efficiency
- provide enhanced landscape and visual features
- support wildlife
- and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

## Water Efficiency

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

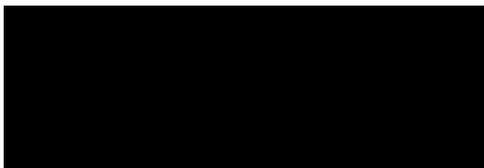
Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water. Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and this should be included within a Policy in the Neighbourhood Plan.

## Basement Developments

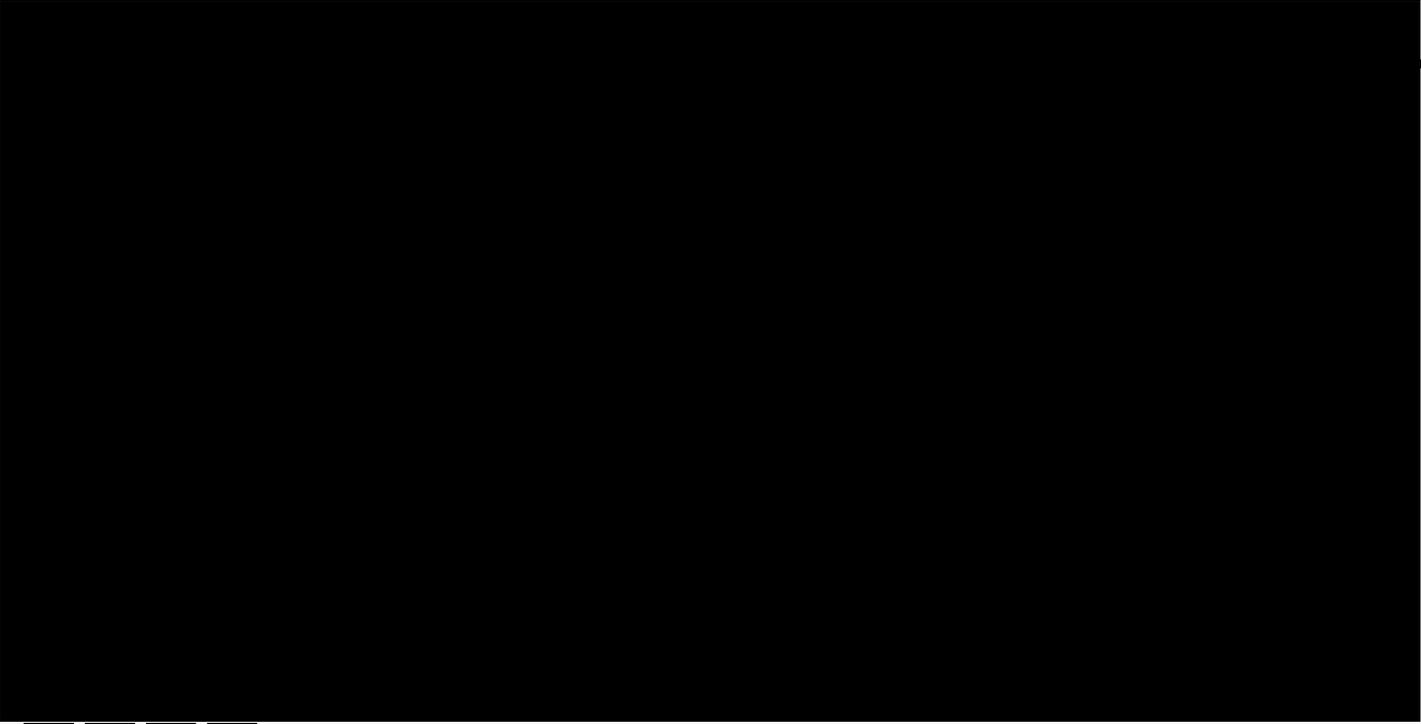
Whilst Thames Water does not object to basement development we would like ensure that all development is protected from sewer flooding through the installation of a positive pumped device, as such we would request that reference is made within the Neighbourhood Plan to this being a requirement of all development.

We hope this is of assistance. If you have any questions please do not hesitate to contact Carmelle Bell on the above number.

Yours sincerely,



**Richard Hill**  
**Head of Property**



**From:** Oliver Froment [REDACTED]  
**Sent:** 18 November 2017 10:34  
**To:** PlanningPolicy <PlanningPolicy@camden.gov.uk>  
**Subject:** Comments on the Hampstead Neighbourhood Plan

Dear Sir, Madam,

The section 5 basements is obviously the result of lots of good and thorough works by knowledgeable residents who are very experienced on the matter. **It should be fully adopted as it is without further modifications requests from Camden.**

The only criticism would be the basement section is sometimes not prescriptive enough in its language. This is as the result of Camden's Planning department constant attempts over the years to water down its content.

This in my opinion reflects a very irresponsible attitude from the department at Camden that has been reviewing and commenting the previous drafts of the basement section and constantly objecting on its content in a petty and inconsistent manner. For example there have been previous attempts by the reviewer at Camden to object to the proposal by the Hampstead Neighbourhood Plan to use Burland scale 1 (cracks less than 1mm in width) as yardstick for the maximum amount of tolerated damages that can be inflicted on neighbouring properties. Fortunately and rightly so, the Planning Inspectorate has requested that Burland scale 1 be adopted as the new level of damage protection afforded to residents in Camden's policies.

Overall, Camden has utterly failed to actively and positively support the previous drafting of the plans on basement matters by constantly attempting to water it down on many occasions and on many items so as to dilute its effectiveness.

I would like to be notified on the Council's final decision.

It is very regretful to see that Camden is not there to protect the residents that are direly affected by inconsiderate basement applications promoted by often greedy and socially totally irresponsible developers. Very often as a result of inadequate policies and their enforcements many residents have not only to endure years of misery but also be significantly out of pocket and have their house significantly damaged and with permanent loss of amenity. The end result is that Camden is also utterly failing to promoting sustainable development which is at the chore of the National Planning Policy Framework.

Shame on Camden.

## Vickers, Ben

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**From:** Planning South <Planning.South@sportengland.org>  
**Sent:** 06 November 2017 14:33  
**To:** PlanningPolicy  
**Subject:** Re: Hampstead Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for

social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

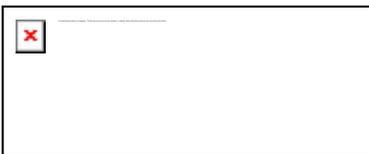
If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Admin Team**

T: 020 7273 1777

E: [Planning.south@sportengland.org](mailto:Planning.south@sportengland.org)



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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## PlanningPolicy

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**From:** michael priaulx [REDACTED]  
**Sent:** 10 December 2017 11:01  
**To:** PlanningPolicy  
**Cc:** Edward Mayer  
**Subject:** Hampstead Neighbourhood Plan consultation response

Swift Conservation would like to see the beneficial species which make up our potentially rich urban biodiversity, and rely on buildings for their survival, to be given higher priority, as these species are becoming seriously endangered in the Borough and the UK as buildings are refurbished and demolished and their habitat is lost without replacement. In particular swifts, house sparrows and starlings, whose numbers have all dropped by 50% or more in the last 20 years, and also bats who are also threatened in many areas.

Creating new nesting and roosting sites is straightforward, as integrated nest and roost bricks have been proven effective and are cheap, almost invisible, easy to install and zero maintenance. We would like to see these installed in all new developments that are suitable, together with an emphasis on providing street trees, "green" walls, "green" roofs, and also a move towards sustainable urban drainage systems and rainwater harvesting to relieve the "hardening" of the London landscape by the covering over of front and rear gardens to provide parking, barbecue areas etc. This is directing rainwater straight to the sewers where it has the potential to cause flooding, while the associated drying out of the areas around dwellings is provoking subsidence, and altogether it is denying plants and trees the water they need to survive.

Stand-alone combined swifts nest and bat roost towers are now available which are no larger than a mobile phone mast or lamp post, and we would like to see these installed for all major projects.

We would also like to see ecological surveys being mandatory for building works in areas known to support the key species mentioned above, and appropriate protection measures taken following the ecologist's recommendations.

Then we can look forward to a future sharing our streets with companion species within a greener environment, and enjoy the proven health benefits (e.g. reduction of the incidence of asthma) as well as the feeling of well-being that this brings.

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Relevant to all aspects of the documents but particularly Biodiversity e.g. Appendix 4.

+++++

I wish to participate in a public hearing if one is held.

I wish to be notified of the Council's final decision in relation to the Plan.

Mike Priaulx, Edward Mayer,  
on behalf of

Swift Conservation

[www.swift-conservation.org](http://www.swift-conservation.org)

## PlanningPolicy

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**From:** Islington Swifts <islingtonswifts@gmail.com>  
**Sent:** 13 December 2017 08:04  
**To:** PlanningPolicy  
**Subject:** Hampstead Neighbourhood Plan consultation response

Most relevant to Section 4 Natural Environment, policy NE4 Supporting Biodiversity.

Comment made by Islington Swifts Group in the current absence of a Camden-specific swifts group.

The laudable intentions of protecting and improving the buildings of the Hampstead Neighbourhood is both a threat and an opportunity for endangered urban buildings-based biodiversity that is currently apparently being completely overlooked in the Plan.

Species which depend on our buildings for their habitat are seriously threatened with extinction in Hampstead and London generally unless we intervene, with swifts, house sparrows & starlings already suffering a 50% reduction in numbers or greater in 20 years in the UK, and many species of bat are also significantly threatened.

This is largely due to traditional nesting sites in older buildings being lost to insensitive renovation and refurbishment without replacement

However, creating new nesting and roosting sites is straightforward, as integrated nest and roost bricks have been proven effective and are cheap, almost invisible, easy to install, and zero maintenance. We would like to see these installed in all new developments that are suitable.

General renovation work can easily protect existing biodiversity with minimal cost by a range of simple measures including nestboxes and replicating the existing nest or roost sites.

These urban species are being overlooked by environmental policies which focus on green spaces rather than buildings.

So we think it is particularly important that the Neighbourhood Plan recognises its role to play in the protection and enhancement of urban buildings-based biodiversity.

We would like to attend any public hearing.

We would like to be kept informed of the Council's final decision.

Islington Swifts Group

Email: [islingtonswifts@gmail.com](mailto:islingtonswifts@gmail.com)

Twitter: @islingt\_swifts

Website: [www.islingtonswifts.wordpress.com](http://www.islingtonswifts.wordpress.com)



RichardBarnes@woodlandtrust.org.uk

13th December 2017

**Re: Consultation on Hampstead Proposed Neighbourhood Plan**

**Woodland Trust response**

**Thank you very much for consulting the Woodland Trust on your Neighbourhood Plan.**

**Open Space and Recreation**

We are pleased to see that the Natural Environment section of your Neighbourhood Plan, Policy NE1, which identifies 15 Local Green Spaces, and Policy NE2, that seeks to protect trees which currently reflect local character, whilst also the natural environment in Hampstead. However, your Plan for Hampstead should also seek to support conserving and enhancing woodland with management, and to plant more trees in appropriate locations. Increasing the amount of trees and woods will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

The Woodland Trust believes that trees and woods can deliver a wide range of benefits for placemaking for local communities, in both a rural and urban setting, and this is strongly supported by current national planning policy. The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication **Woodland Creation – why it matters** <http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodandCreationbro.pdf> . These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).

The **National Planning Policy Framework** (NPPF) also supports the need for more habitat creation by stating that: *‘Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’*, (DCLG, March 2012, para 114). Also para 117 states that: *‘To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan’*.

The **England Biodiversity Strategy which** makes it clear that expansion of priority habitats like native woodland remains a key aim - *‘Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England’*, (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).

A reading of these two policies in the NPPF together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for your Neighbourhood Plan.

Woodland creation also forms a significant element of the **Government Forestry Policy Statement** (Defra Jan 2013): *'We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity'*.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan, and the adopted Camden Local Plan (2017) acknowledges this with sustainability and climate change, and Policy CC3 (Water and flooding), and also how it is keen to protect green spaces, such as Hampstead Heath, given that it is potentially vulnerable to flooding. Trees offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication **Stemming the flow** – the role of trees and woods in flood protection - <https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/>.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document which is intended for policy planners such as community groups preparing Neighbourhood Plans <https://www.woodlandtrust.org.uk/publications/2017/09/planning-for-ancient-woodland/>

We welcome the commitments in your Neighbourhood Plan vision for Local Green Spaces, and biodiversity corridors in the town of Hampstead, and how this can improve the street scene. Also, the Woodland Trust is pleased to see veteran trees also being acknowledged, and how these should be fully and strictly protected, as well as the site protections of trees during any construction.

We would like to highlight the Woodland Access Standard (WASt) in our **Space for People** publication. As your Neighbourhood Plan seeks to complement your vision and objectives by setting out in more detail the development aspirations and the planning requirement for the delivery of key development sites, therefore, you may consider also using the WASt to support the design of green infrastructure and place making in the Neighbourhood Plan for Hampstead.

Also, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation being acknowledged with your Neighbourhood Plan. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level.

Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.

Please do not hesitate to get in touch with me if you have any queries arising from this response. In addition you may find our neighbourhood planning hub a useful resource: <https://www.woodlandtrust.org.uk/get-involved/campaign-with-us/in-your-community/neighbourhood-planning/>

Yours sincerely,

**Ian Lings**

Local Planning Support Volunteer

[GovAffairsTemp@woodlandtrust.org.uk](mailto:GovAffairsTemp@woodlandtrust.org.uk)

## PlanningPolicy

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**From:** Claire McLean <Claire.McLean@canalrivertrust.org.uk>  
**Sent:** 23 November 2017 15:21  
**To:** PlanningPolicy  
**Subject:** RE: Hampstead Neighbourhood Plan consultation

Dear Planning Policy Team,

Thank you for this recent consultation.

I can confirm that as the Canal & River Trust has no land or waterspace within the Neighbourhood Plan Area, we have no comments to make.

Kind regards,

Claire McLean | Area Planner | London

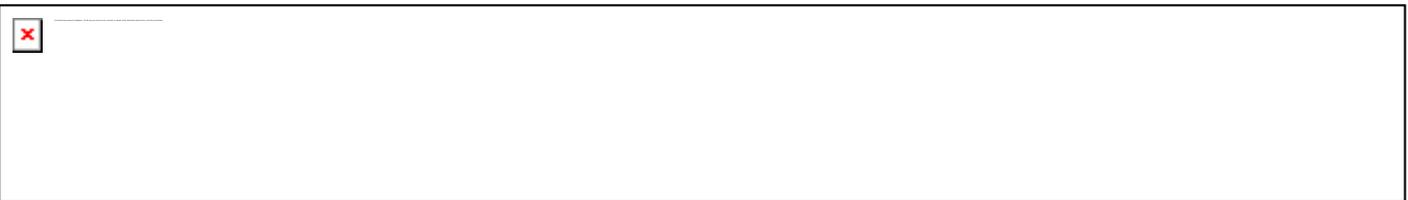
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T: 0203 204 4409 | M: 07917616832

**Living waterways transform places and enrich lives**

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**From:** Camden Council [mailto:CamdenCouncil@public.govdelivery.com]  
**Sent:** 02 November 2017 10:26  
**To:** Claire McLean <Claire.McLean@canalrivertrust.org.uk>  
**Subject:** Hampstead Neighbourhood Plan consultation



Dear Sir / Madam

### **Re: Hampstead Neighbourhood Plan**

Hampstead Neighbourhood Forum has submitted their proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are now consulting residents and interested stakeholders on this proposed Plan.

#### **How does this affect me?**

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including design, the natural environment, basements, transport and housing.

The Neighbourhood Plan, if approved, will be used, alongside the Council's policies when making planning decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan - the 'neighbourhood area') and for further information on how to respond to this consultation please go to:

[www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)

Paper copies of the Plan are also available to view at:

- **Keats Community Library**, 10 Keats Grove, London, NW3 2RR
- Opening Hours: Tuesday & Wednesday 10am – 6pm; Thursday & Friday 10am – 7pm; Saturday and Sunday 12pm – 4pm.
- **5 Pancras Square Library**, London, N1C 4AG

Opening Hours: Mon - Sat 8am – 8pm and Sun 11am – 5pm

Comments must be received by **Wednesday 13<sup>th</sup> December 2017** and should be sent via e-mail to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk) or post to:

Strategic Planning and Implementation  
Regeneration and Planning  
London Borough of Camden  
Judd Street,  
London WC1H 9JE

### What happens next?

Once the consultation has finished, the Council will forward the responses and the Neighbourhood Plan to an independent examiner. The examiner will assess whether the plan meets the statutory requirements. If the plan passes the examination, a referendum will be organised to give the community the final say on whether the Plan is to be used in determining planning applications in the designated neighbourhood area.

If you have any further queries, please do not hesitate to contact us:

Tel: 0207 974 8988 or e-mail [planning.policy@camden.gov.uk](mailto:planning.policy@camden.gov.uk)

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