

Hampstead Neighbourhood Forum

COMMENTS ON THE DRAFT LOCAL PLAN AND CPG1 AND CPG5
17 April 2015

The Hampstead Neighbourhood Forum welcomes the new approach in Camden's Draft Local Plan to combine the Core Strategy and Development Policies. As a minor suggestion, we feel the proposed numbering system in the draft plan is confusing for the layman and would be more accessible if simplified.

We also welcome a review of the planning guidance and would like to draw your attention to our recommendation that the South End Green Neighbourhood Centre be re-defined (see last page).

Comments on the Draft Local Plan

Community Infrastructure Levy

In point 1.23, regarding the Community Infrastructure Levy, there should be a mention of engagement with neighbourhood forums on the 25% of CIL reserved for local projects, as in the government guidance:

“...The use of neighbourhood funds should therefore match priorities expressed by local communities, **including priorities set out formally in neighbourhood plans.**”

The Government does not prescribe a specific process for agreeing how the neighbourhood portion should be spent. Charging authorities should use existing community consultation and engagement processes. This should include working with any designated neighbourhood forums preparing neighbourhood plans that exist in the area, theme specific neighbourhood groups, local businesses (particularly those working on business led neighbourhood plans), and using networks that ward councillors use. Crucially this consultation should be at the neighbourhood level. It should be proportionate to the level of levy receipts and the scale of the proposed development to which the neighbourhood funding relates.”

Policy G1 Delivery and location of Growth

a. supporting development that makes full use of the site taking into account

Development is required to be sustainable so there should be no need to mention sustainability here unless it is qualified. However, making FULL use of the site implies maximising development. A better phrase would be to:

‘maximise the potential of sites for development, through high quality design and construction, accommodation and spaces that can be adapted over time, and have taken full account of the character and context of the area, and without detriment to the enjoyment and needs of future generations.’

Paragraph 2.3 should cite the reference for this forecast for Camden, whether it differs from past forecasts and how these forecasts will be monitored to ensure that the plan is kept up to date.

The Plan makes several references to ‘take account of’. This is too vague and it should be qualified. All too often this phrase is followed by a long list of bullet points, but no weighting, order or priority is given to them. This allows the Council to pick and choose which ones it wants. This leads to the frustration of inconsistency when applying the policy. Much greater thought is needed as to how these policies will be interpreted and applied.

2.8

Density is only one measure. A high density development may lead to little occupation if smaller units are bought by investors and never let out. The Council should be wary of promoting high density alone without other measures, such as an appropriate mix of units and sizes, commercial units. The Council should have flexibility to take every scheme on its merits and to promote balanced and mixed developments that meet the needs of the widest range of community.

2.9

Notwithstanding the Chapter on Design, define what excellent design quality means and how it will be assessed. Camden is now one of the very few Boroughs without a local design review panel as encouraged by the NPPF. Camden should put in place a Design Review Panel and require pre-application schemes to seek the views of the panel. The Panel should be run according to the joint RTPI, RIBA, LI, CABI document ‘Design Review, Principles and Practice’. Camden has Design Awards and this should be mentioned.

2.10

Policy has tended to favour high density development over quality of design. Paragraph 2.10 says that development should take account of Table 3.2 of the London Plan, but then says development will be expected to be at the higher end of the density range. This places too much emphasis on maximising the density of the

site rather than seeking higher quality design, better amenity, flexible space standards or mix of development.

The policy should seek to give greater priority to the right development for the right site not just meeting a London-wide matrix, which will inevitably be revised.

Policy H1 Maximising housing supply Densities and Growth

Paragraph 3.27

This paragraph should recognise what other factors will be assessed, for example, exceptional design quality could lead to higher density, or a taller building, but equally the special character of an area (beyond designated heritage assets for example) may lead to a different solution that requires a more flexible approach to density, for example, protecting street or front of plot trees, open spaces, respecting building lines, reducing the need for car parking.

Financial Viability Assessments in 3.29 onwards.

FVAs have become a dark art, smoke and mirrors. Camden should seek best practice in assessing and dealing with FVA. Financial Viability Assessments should be requested at the pre-application stage on schemes. The Assessment will be independently reviewed at the earliest stage avoiding the need for horse-trading behind closed doors at a later stage in the process. It should not be assumed that the FVA will always be a confidential matter.

FVA should be undertaken at several stages of the design development and be made available to the Council for independent review.

Once permission is granted the FVA will be part of the S106. If development is not completed within say 3 years of the granting of consent then the FVA will be reviewed and should the values have increased then a betterment or overage will apply.

Policy H4 Maximising the supply of affordable housing

Seeking overage or betterment in viability assessments should be taken forward. The target of 50% seems the exception not the rule. It is not applied or enforced. However, the negotiations over affordable housing skew other requirements such as high quality design, provision of open space or community assets or providing housing where a reduced market price would lead to a better outcome such as for elderly people. Camden should instead set a range and that on-site provision is looked upon more favourably and that other contributions will be weighed in the balance. This requires developers to discuss at the early stages the viability and to be open about it.

Policy C2 Community Health and Well-being Schools Provision

In Hampstead, we have an overabundance of school places for the number of children in the area. More than 3,000 children go to school in the Forum area (we have just one secondary school) yet just 1,325 children aged between 5 and 15 are residents. We would like that specific reference be made in C2 b. that consideration will be given to the impact on local traffic of development proposals.

Policy C3 Public Houses

We very much welcome this approach to protect public houses of value to the local community. However, if a change of use is justified, the Council's preferred alternative for housing should not apply to Town Centres or Neighbourhood Centres where office or retail use is preferable.

Policy A1 Managing the Impact of Development

The impact of development has been an issue of great concern to many of our 800 members and has been raised frequently in of all our consultation exercises, particularly the impact of basement developments.

6.14 Attenuation measures

We believe more protection is needed to protect against damage to the public realm from development, in particular damage to trees, pavements and lamp posts, often caused by HGV's and skips, perhaps through a bond posted to cover any damage that occurs during the construction phase.

6.41 – 6.45 Hampstead Heath

The impact of development on the fringes of the Heath – not just on views – should also be considered.

6.70

Private gardens are an important part of biodiversity, particularly in urban areas (see the National Tree Map). Development which leads to the loss of garden should be refused. Greater protection is needed in particular of tall trees and veteran trees.

6.75

This section should also include specific mention of hedgerows and trees as well as green corridors.

Policy A3 Protection, enhancement and management of biodiversity.

6.84 Tree Protection

A Survey and Assessment should be required, not “may be required”.

Policy A4 Noise And Vibration

Noise from residential balconies, AC units (and outdoor speaker systems) should be included.

Policy A5 Basements

We welcome this much improved policy concerning basements and light wells but believe that additional improvements can be made and would urge the Council to more closely adhere to provisions in the draft RBKC document, particularly in giving more protection to neighbours.

In Policy A5, “Basement development should not d. exceed a maximum of 50% of each garden” should relate to the *parts of the garden*. It should not be the case that someone with both a front and rear garden can develop over 50% of both or can combine the area calculation and build over the entirety of one part or another.

Policy D1 Design

7.20 Development within rear gardens

Development of front gardens through parking and paving should also be resisted.

7.27 Views

Views “within” Conservation Areas should be included be listed.

Polcy D3 Shop fronts

7.63

Should require new and alternations to existing shopfront to have a “positive visual impact on the character of the street” as RBKC Policy CL10

Polcy D4 Advertisements

7.71 Heritage and Conservation Area

As well as resisting advertisements that contribute to clutter, the Council should also resist development that results in window clutter or the lack of transparency (relates also to 7.66).

7.73 Street furniture and the public realm

If permission is given for street furniture, some condition should be applied to require the removal of such furniture should its use become redundant.

Policy TC 2 Housing above shops

This preference for housing above shops should not necessarily apply to Town and Neighbourhood Centres where there is a need for office and/or retail space.

Comments on Camden Planning Guidance

CPG1 – shop fronts

7.11 General principles

One general principle should be that new or altered shop fronts should make a *positive contribution* to the area.

Also, the fourth bullet should read: “Standardised ‘house style’ frontages will not be acceptable unless they harmonise with the surrounding context and buildings and, particularly in conservation areas, use appropriate materials.”

7.12

Window displays

Glazed shop fronts should be kept clear of excess signage that obscures the transparency of the shop front

Fascias

Should specify no laminates or acrylic signs as a rule; preference for wood with painted signage as in [RBKC Basement Guidance: 3.3.1.6](#)

The use of large areas of acrylic or other shiny materials in fascias should be avoided. On a nineteenth century building a painted timber fascia is the most appropriate solution with either painted lettering or individual letters of another material.

Temporary fascias, such as banners, should not be permitted (as in the Royal Peri Peri banner in South End Road).

Box fascias in conservation areas should not be permitted.

See [RBKC 70-page shop front design guidance](#)

Comments on CPG5

Page 91 – We recommend a revised definition of what constitutes the South End Green Neighbourhood Centre.

Currently, only 1-65 South End Green (west side) and 37 Pond Street are included as part of the South End Green Neighbourhood Centre. This should be expanded to include: nos. 10 (M&S) and 14 Pond Street, which are adjacent, and around the corner, nos. 85b-87 Fleet Street; the White Horse Pub across the street (154 Fleet Street), and Newman's Locksmith next door to the pub at 4 Constantine Road; also, nos. 1-4 Elm Terrace, Constantine Road. The Garden Gate Pub, 14 South End Road, should also be included.

Janine Griffis
Chair, Hampstead Neighbourhood Forum
www.hampsteadforum.org