

Comments on the Hampstead Neighbourhood Forum Draft Plan Spring 2017	Response	
<b>General comments in support</b>		
<p>All these proposals sound extremely sensible &amp; desirable  Comprehensive plans could be a template for UK plc!  Thank you very much indeed for carrying out this task.  Thanks and well done for all you are doing for the community  Otherwise: a great piece of work, thank you!  I support all that has been proposed so far - If you live in Hampstead who wouldn't?  An extremely well put together plan that covers all aspects of the neighbourhood.  It is excellent to see a well-thought out plan to bring some consistency and accentuate the positives in this area.  I welcome this plan to help protect Hampstead's charms, while respecting the needs of businesses and community.  Excellent document. Well done to all.  I love this plan. I am excited to be a part of it.  Again, very hearty congratulations. This is a mammoth effort – and for such extraordinary good. Well done.</p>		
<p>I notice that there are no specific height restrictions for new developments. Has this been considered, and will other policies prevent the building of inappropriate tall buildings without specifically detailed restrictions?</p>	<p>We believe we have addressed the issue in our descriptions of the character areas, none of which currently feature tall buildings. DH1 requires that new developments respond and contribute positively to the character area.</p>	<p>JG, DC</p>
<p>First congratulations to you and the Forum for the impressive amount of work that must have gone into the Neighbourhood Plan. By way of contribution can I share some lessons that I learnt from the battle around 29 New End?</p> <p>As you know the developer won on appeal after the council had unanimously rejected it on multiple grounds. With the benefit of hindsight I think that our fate was largely sealed as soon as the planning officer approved the scheme. The rest was just going through the motions, with very high odds of a victory for the developer.</p> <p>Massive opposition from local residents (337 against 2 in the official consultation) had no bearing on his report, or on the rest of the process. I feel that beyond a certain level of local opposition, say 75%, the application should be automatically rejected.</p> <p>The developer stated clearly that the nurses' home was in great condition. Its 65 small units could have been converted into individual flats. Residents would have actively welcomed such refurbishment and the works would have been much quicker, less costly, less risky, less disruptive and more respectful of the character of the area. 25-30 mid-size flats could have been delivered by 2014, or so instead of 17 luxury flats by 2019 or so. There are several problems: (1) affordable housing requirements were simply waived and (2) the type of accommodation and the date of delivery was never taken into account and (3) the application was judged in</p>	<p>The Plan will resist the loss of small, non-social housing units. See Policy CO2.</p>	<p>DC</p>

<p>isolation, not by comparison with for instance refurbishment.</p> <p>I do not know how far the Neighbourhood Plan can go but to me these are the key lessons. I hope that you will find these lines useful.</p>		
<p>Thank you for all the hard work. I think the basement policy regarding footprint is too extreme and rather blanket as for some houses with large gardens it is may be viable whereas terrace houses going down two levels can be a larger issue.</p> <p>I think the cycle storage policy is unnecessary</p> <p>I'm surprised that no mention was made of school numbers in regard to traffic. There are proposals and planning applications still being submitted for new and expanding schools and this has a huge impact on traffic. I think an objection to new schools and any expansion due to Hampstead reaching saturation point should have been mentioned.</p>	<p>The policy regarding the footprint of basements seeks to clarify Camden's policy, which we feel could be read as permitting a basement that is 150% the size of the footprint but completely in a garden. In other words, if a basement is to be 150% the size of the footprint, at least 100% has to be under the existing dwelling.</p> <p>School numbers is not an issue the Plan can address. The Plan can only address development that would permit additional numbers. Policy TT3 addresses the traffic implications of any new school development.</p>	OF, CW
<p>I'd much prefer to see all basement development banned. Fair enough if you've sought a compromise because that's unrealistic, but the stress and harm caused to neighbours is a nightmare.</p>	<p>Banning a particular form of development would not be seen as supportive of sustainable development, one of the basic conditions that the Plan must meet.</p>	OF, DC, JG
<p>I think the plan is very comprehensive and well thought out, and represents the ideal for the community in which I wish to live. If only we could make some of these proposals retrospective, to reverse some of the considerable damage already done.</p> <p>Very well considered and thorough plan. Making it retrospective to undo prior damage would be even better.</p> <p>Let's preserve the liveability of the area, and try and roll back prior damage.</p>	<p>Planning decisions cannot be applied retroactively but new development can be encouraged to contribute positively to the Plan area.</p>	
<p>I strongly disagree with implication that permeable developments could acceptably include thoroughfares available to both pedestrians and cyclists; this jeopardises pedestrian safety.</p> <p>Otherwise, congratulations for being unequivocal about the importance of maintaining diversity of housing provision.</p>	<p>The purpose of this policy is to encourage development that is free to the movement of people (but not cars); i.e., it is not supportive of new gated developments.</p>	
<p>It would be great to solve the problem of traffic congestion - and therefore pollution - during school runs. The situation is becoming intolerable. Thank you for your work,</p>		CW, ST
<p>Overall this an excellent document that encapsulates what the vast majority of residents wish in order to</p>	<p>Our planning policies must meet the basic conditions set forth</p>	

<p>sustain healthy living conditions. Sometimes the policies could attempt to be slightly more affirmative in their wordings so as to ensure that Camden fully takes their content into account in the decision and planning processes.</p> <p>I would like to see the Plan tougher than this, but within the limits of what can be achieved, I think it is very good.</p>	<p>in the legislation, including having regard to existing national and local planning legislation and contributing to sustainable development. The wording of our policies is carefully considered to achieve this.</p>	
<p>Excellent, thank you very much. One point on South End Green, the southbound traffic queues are terrible because of the constant stream of people going across the 3 zebra crossings. Traffic backs all the way up East Heath Road in the morning causing pollution and delays to journey times. I am pleased to see that you are looking at this area.</p>		CW
<p>These proposals seem to go as far as possible given the present legislation, and I hope they will be successful.</p>		JG
<p>BA1 needs strengthening for Listed Buildings; e.g. "For Listed Buildings, no basement greater than the existing building footprint"</p>	<p>The Camden Local Plan states:  <i>The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden. Listed buildings often form an intrinsic element of the character of conservation areas and therefore basement development which harms the special architectural and historic interest of a listed building is also likely to fail to preserve or enhance the character or appearance of the conservation area in which it is located.</i></p>	OF
<p>Please tighten your policy on basements under listed buildings; your policy should match the Camden proposals to limit the maximum basement area to the footprint of the building above</p>	<p>The Camden Local Plan, 6.138, states: "The Council will only permit basements where they do not cause harm to the significance of a listed building or its garden." The HNP does not contradict this policy.</p>	OF, DC, JG
<p>I am generally supportive of the plan which is very comprehensive. I have comments on the following 3 areas below:</p> <p>'6.41 Community engagement confirms that a shared use scheme and the reconfiguration of bus stands would be welcomed for South End Green. The Plan encourages Camden Council to work with partner organisations and Transport for London to help realise the community's vision for the area.'</p> <p>- I would like to suggest that what remains of the "green" (containing the Gothic Revival drinking fountain) be extended by converting the adjacent cut through road to a narrow footpath and creating seating areas for those using the cafés and other retail shops. This would give South End Green a proper centre and improve the local appearance as well as enhancing the environment. The bus parking that presently exists there would need to be moved. There are areas along Pond St adjacent to the Royal Free Hospital which could provide alternative bus parking and would allow buses to park nearer the hospital giving patients with disabilities</p>		

<p>better access as they would not have to walk up the steep hill from the present bus stop.</p>		
<p>Re 8.6 - There is no mention of here of the small “Green” in South End Green, not surprisingly as it has been diminished over the years and is now negatively affected by the barrier of the buses that park on the adjacent cut through road and cut the space off from the retail outlets. The 'green' is presently not used enough and the bus pollution does not help as is not conducive to ‘Café culture’. If the road was removed it would add a great community resource/ meeting area.</p> <p>‘8.15 The Plan encourages street life though better design of the public realm, which would facilitate community events such as festivals, fairs and street parties.’</p> <p>- Please see comments above about enlarging what remains of the “Green”. This would facilitate community events as well as year round use of the area.</p>	<p>The “Green” is an important area and protected as a Registered Green (TVG27), under the London Squares Preservation Act 1931. See Appendix 5 and the Vision for South End Green. In our Vision for South End Green, we encourage Camden Council to work with partner organisations and TfL to better improve the pedestrian experience in SEG.</p>	<p>OF</p>
<p>‘Policy EC2: Retail centre environment 7.19 The appearance of a high street is one of the key factors in its vitality. Despite existing guidance, many inappropriate and poorly designed shopfronts have been inserted into existing frames. Some fascias use inappropriate materials and depths, resulting in a lack of harmony with the original buildings, quite a number of which are listed.’</p> <p>-- Please see comment above.</p>	<p>There are a number of shopfronts that do not contribute positively to the character areas. Applications for new shopfronts will need to follow the policies set forth in the HN Plan and in other Camden guidance.</p> <p>In order to assure more appropriate signage for traditional shopfronts, many of which as you say are listed, we have added a sentence about appropriate fascias for traditional shopfronts – “Recommends that timber fascias be used on traditional shopfronts with either painted lettering or applied individual letters of another material.”</p>	<p>CW, JG</p>
<p>CONSTRUCTION/BASEMENTS</p> <p>You say 14% of people work from home. For these people, like myself, the endless construction noise is infuriating to the extent I consider leaving Hampstead (like John Conti!).</p>	<p>In order to take into account the needs of affected neighbours, we have added:</p> <p><b>“Unless otherwise agreed with the affected residents,</b></p>	

<p>1. The proposal to stop loud work from 12-2.30, and from 5.30 is counterproductive. The one time of day I don't mind loud work is lunchtime since I am more likely to be out / not working! No loud work before 9am is a good idea.</p> <p>Furthermore, restricting hours just means the noise goes on for more months...</p> <p>2. Getting builders to keep doors &amp; windows closed makes a huge difference to noise! Especially on these narrow terraced streets where the sound just echoes up and down the street. For some reason builders seem to walk into a site and open all the windows, even if it is snowing.</p> <p>3. Similarly getting builders to work inside rather than on the street or in the garden makes a huge difference to noise levels.</p> <p>4. Frankly I suspect you would have a lot of support for an outright basement ban, at least for terraced houses. It is so unbelievably anti-social.</p> <p>5. It is striking how some building projects "get on with it" whereas others just go on for literally years. Can some sort of penalty be imposed for projects that drag on?</p>	<p>work on basements will be limited to . . .”</p> <p>Existing guidance should cover these other suggestions:  <i>CPG4: All construction and demolition processes are expected to be in accordance with the Considerate Constructors Scheme standards. Construction and demolition processes are also expected to conform to the ICE Demolition Protocol (<a href="http://www.ice.org.uk">www.ice.org.uk</a>) and should have regard to the Guide for Contractors working in Camden, Feb 2008, which is available on the Camden Council website and to the GLA's best practice guidance document The Control of Dust and Emissions from Construction and Demolition (<a href="http://www.london.gov.uk">www.london.gov.uk</a>).</i></p>	
<p><b>TREES</b>  There seems to be little to protect the endless trees felled every year that are not "veteran" / "important" or protected by a TPO. Currently, even though some people apply for planning permission, Camden have no right to prevent the felling. More needs to be done to stop this - so many trees have been felled unnecessarily (e.g so someone gets more light - so prune it!) and I feel a real change in the 20 years I have been in Hampstead.</p>	<p>Camden can prevent felling where trees provide sufficient amenity. Identifying biodiversity corridors is another way to protect trees.</p>	
<p>Traffic reduction and curbs on development should have high priorities.</p> <p>Restrict traffic and development</p> <p>Restrict traffic and development severely</p>	<p>We have several policies dealing with the impact of development on traffic.</p>	<p>OF, DC,</p>

Put restrictions on traffic and development, and don't spoil the Heath		
<p>On Basements I can tell you have had excellent professional advice but I do not support the proposal that basement developments can extend beyond the footprint of the house. (BA1 point 3)</p> <p>WHILE I SUPPORT YOUR BASEMENT RESTRICTION IN PRINCIPLE, IF I READ IT CORRECTLY, LIMITING THE EXPANDED FOOTPRINT TO NO MORE THAN 50% BIGGER THAN THE HOUSE IS TOO BIG. THE MAXIMUM SIZE SHOULD BE THE FOOTPRINT OF THE HOUSE.</p>	Camden has a restriction that basement development must not exceed 150% of the footprint of the house. This policy is to clarify that 100% of the basement size should be under the house; i.e., no more than 50% of the footprint of the house can be under the garden.	VH
<p>On BA2 - 5.16 - I think it should be mandatory that whichever technical advice is given by the qualified experts in order to prepare a planning application that the same experts should be employed once and if planning permission is granted. Currently there is no guarantee that even qualified experts must be employed on a build.</p> <p>Generally I would prefer if basements were never permitted when a property is either semi detached or in a terrace of houses and therefore likely to deleteriously affect neighbouring properties.</p>	This falls outside planning law.	JG
Temporary banners should not be employed as a long-term substitute for permanent' - trust this means stopping commercial agents hanging advertising banners in empty shops for lengthy periods of time.	The use of estate agents signs is covered by different legislation.	
<p>Items suggested for incorporation</p> <ul style="list-style-type: none"> <li>- Role of pre-schools and schools (level of supply, traffic-related issues)</li> <li>- Provision of housing for key workers linked to the local community (teachers, nurses etc)</li> </ul>	Traffic-related issues are covered in the Traffic and Transport section. CO2 outlines the plans priorities for smaller housing units.	OF
<p>. I would like to suggest that all the front gardens and drives in our locality use permeable paving from now on. It would reduce local flooding and prevent problems with subsidence. More information on the following RHS weblink:</p> <p><a href="https://www.rhs.org.uk/advice/profile?pid=878">https://www.rhs.org.uk/advice/profile?pid=878</a></p>	In NE4, the Plan encourages proposals to increase the area of permeable surface. The Local Plan CC2 states that development should not increase and wherever possible reduce surface runoff through increasing permeable surfaces and use of sustainable drainage systems.	
<p>First, I couldn't find anything in there about the length of time that some building work is allowed to run on. As you know, 15 Gayton Cres has been a building site since 2008 – coming up to 10 years. Can the plan say something along the lines of “Approved building works will be expected to be commenced within 2 years, and completed within 2 years of commencement – the Council will exercise its “clean up” powers to ensure that properties within this important Conservation Area are not allowed to drift on in a state of partial repair/rebuilding.” I haven't got the words right, but something like that.</p>	<p>See: <a href="#">Once development has commenced there is no time limit to complete the development as such however the local authority does have the power, if significant progress is not being made, to make an order that the work be completed within a given time period. The minimum time period for the purpose of such an order is 12 months and failure has the effect of revoking the permission.</a></p> <p>In England and Wales the power to revoke planning</p>	DC, JG

	<p>permission stems from section 97 of the Town and Country Planning Act 1990. The rules relating to compensation stem from section 107 of the 1990 Act. . . .</p> <p>Powers to revoke planning permission are very rarely used. Where they are used they are often uncontentious and unopposed. Since 2009 only 3 revocation orders issued under section 97 of the Town and Planning Act 1990 have been submitted to the Secretary of State for confirmation.</p>	
<p>Second, I really like the idea of trying to reclaim some of the heritage that has been lost. I don't know how possible this is within the planning framework, but I wonder if we could start moving towards a position where, with something awful (and there are lots of examples), some planning pressure can be used to try to get it fixed, not now, but if an application is made to do something else. So, for example, take a brick house that has been unsympathetically painted. Currently, it sits there quite happily and nothing can be done to suggest that the owner strip the paint off. Indeed, the rules provide that they can paint it any colour without permission. Is there a way, for example, when next time that house applies for an extension or other works, that Council says – we'll only approve if you strip the paint off.</p> <p>I suspect that this is a bold suggestion. But otherwise there is no way to get these heritage aspects back. Car parking in front gardens would be another example – in heritage and environmental terms it is awful. But if those owners apply for a rear extension, say, can the Council say “only if you give up your parking”.</p>	<p>The Article 4 Direction that is in place for much of Hampstead does not remove all permitted development rights. The right to re-paint a house or to replace “like for like” remains. The Plan can encourage that positive improvements are made but must be consistent with 173 of the NPPF: “...therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”</p>	VH
<p>Third, I wonder if it's appropriate to say something specific about corner blocks/rears given the particular nature of hilly Hampstead, and the fact that some-one's rear is often some-one else's front. This is likely a PD question – because PD is quite generous at the rear of houses, even in a Conservation Area. Is there any chance of removing PD at the rear when that rear is visible from another front. I'm thinking here of 15 Gayton Cres – the rear is in the front yard of 41 Willow Road. It has always been odd to me that the side of 15 Gayton Cres was not treated in the same way as the front, even though it fronts Willow Road, and, whilst the PD rights at the rear have now been removed by the first inspector, they should never have been there in the first place, given the sensitive fronting onto Grade II listed Willow Cottages. As a general principle, might the plan try to curtail PD rights where a property is situated such that its sides/rear are actually at the front of another street/view/listed dwelling?</p>	<p>The Plan cannot curtail permitted development rights but the draft Hampstead Area Appraisal and Management Strategy recognises this: “Extensions should be in harmony with the original form and character of the house and the historic pattern of extensions within the terrace or group of buildings. The acceptability of larger extensions depends on the particular site and circumstances <b>as does the acceptability of extensions where the rear or the side of a property is adjacent to the street, for example in a corner plot.</b> “</p>	JG, DC
<p>Fourth, I tried to “road-test” some of the policies against the experience we've had with 15 Gayton Cres, and wasn't entirely sure that pointing to any of these policies would have made a difference. At the rear of the</p>	<p>This is an excellent suggestion to “road test” our policies and we intend on doing this.</p>	

<p>house, the Inspector, over Council’s rejection, allowed them to keep the central stair tower. Seemingly, nothing can be done about the unsympathetic colour. Nothing can be done to force the replacement of the TPO protected holly tree. Nothing can be done to force the replacement of the railings – and a notice under the Highways Act had to be used to stop them mounting the curb to park. I realise that there are many different elements to this on-going saga, but you and your team might try to road-test the plan to ensure that we have stronger tools in future to deal with inappropriate development. The new lions at the top of Gayton Cres are another example – who knows how they got through Camden – but what in the plan would prevent them now?</p>	<p>Much, however, does fall outside the remit of planning law or is allowed by permitted development.</p>	
<p>This comment refers to Policy C02, Community and Housing. The Plan sets out to support 'affordable social' housing in Hampstead area. This could be interpreted as only the housing provided by the council and the housing associations. In order to capture the full range of affordable housing and include providers outside the local council and the housing associations, such as for instance the community groups and/or private individuals, the term should use all three types outlined in the National Planning Policy Framework: social rented, affordable rented and intermediate housing and refer to London Mayor definition of the terms.</p>	<p>We are treating social affordable and the other two categories, affordable rented and intermediate housing, differently. Camden has identified a shortage of larger (3-bed +) properties in the social affordable category, which we must recognise. However, in Hampstead, in order to support more affordable housing, we are resisting the loss of small properties in all non-social housing.</p>	
<p>Suggests that the CMP be required to consider other developments in area and what the cumulative impact might be</p>	<p>BA3 (1) requires that “disturbance arising from construction, including that arising from construction traffic, parking suspensions and the noise, dust and vibration of construction itself, must be kept to acceptable levels, taking into account the <b>cumulative</b> impacts of other development proposals.”</p>	<p>DC, JG</p>
<p>Comments from the Hampstead BID</p>	<p>Forum Response</p>	<p>DC, JG</p>



<p>Hampstead Village BID is broadly supportive of the Plan. In particular, the aspirations and aims to maintain the street environment and support the local economy are well placed and positive. They align well with the BID’s own focus and activities. There is a recognition of the amenity that residents enjoy from a thriving retail and services mix in the Village and also a recognition of the challenges that businesses face. These positive statements are not however fully followed up with policy direction. Whilst we understand this document is focused on planning there could and should be greater actual commitment to supporting the stated aims and aspirations, even as an annex to the document.</p> <p>It should be noted that Sections 6 (Traffic and transport) and 7 (Economy) have a particular impact on business.</p> <p>We would like to comment on the specific areas below in the interests of Hampstead Village’s business community:</p>	<p>The Neighbourhood Plan is a planning document, which, if it passes examination and referendum, will be adopted by Camden Council to sit alongside its other strategic policies such as the Camden Local Plan. As a planning document, it must meet the Basic Conditions as set forth in national planning legislation.</p> <p>Any matters that we might include that do not deal with planning must be clearly identified and set apart. These “aspirations” will not carry any legal weight. This is not to say that such matters are not worth considering but they will not be subject to the referendum.</p>	<p>DC, JG</p>
<p><b>1. Executive summary</b></p> <p>Stated aim ‘Business friendly – to meet needs of residents and visitors and back local enterprise’ but the policies seem quite restrictive. In other words what does Business friendly mean?</p>	<p>Business friendly means to support “a lively and prosperous Hampstead economy that supports visitors and well as residents’ needs, with support neighbourhood shops, small enterprises, markets, and local job opportunities.</p> <p>We have re-worded 1.5 to read “This means broadening the range of shops and eating and drinking places and <i>supporting the retention</i> of small and independent shops and businesses. [as in EC1 (d): Preserving small shop and retail premises that enhance the character and vibrancy of the area.]</p>	
<p>1.5 ‘Supports development that encourages a healthy retail mix broadening range of shops and eating and drinking places and <i>providing for small and independent shops and businesses</i>’ Not explained what ‘providing’ means?</p>	<p>Have re-written to read: “and supporting the retention of business premises and small and independent shops.”</p>	
<p><b>2 Introduction</b></p> <p>Refers to ‘Hampstead residents’ but surely this should read ‘Hampstead’s community’ or ‘local people’ so as to reflect those working in the area i.e. business community not just residential community</p>	<p>We have re-worded to read “Hampstead’s community”</p>	

2.6 Should refer to ‘Hampstead’s community and visitors’ not just ‘residents’ ‘has made residents keen to ensure that local businesses are given a fair chance.’ What does ‘fair chance’ mean?	Have deleted sentence.	
2.12 Acknowledgement that ‘Neighbourhood Plans can include other ideas to improve the neighbourhood other than development and land use issues, but these have to be clearly defined and delineated and separate from the land use issues in the plan.’ The BID would like to see these other ideas elaborated upon, possibly in an appendix to the Plan. We will be pleased to help inform this detail, which could include traffic management, loading and unloading and parking issues, for example.	Camden has advised us that non-planning matters will not be considered part of the strategic plan.	
2.15 ‘Decisions by private sector businesses to locate in Hampstead (or to exit) will depend primarily on commercial considerations. However, planning rules can have an influence in securing the type of economy and retail centres that residents want’ Very inward looking – not just about residents but also visitors to the area.	Have changed to read “residents and visitors”	
<p><b>3 Design and Heritage DH3</b></p> <p>The urban realm Policy 1. We support this but can it specifically mention ‘sympathetic to the local environment’ or ‘heritage style’?</p>	Have added: The Plan <b>supports development that responds positively to the character areas</b> and complies with the relevant streetscape design guidance produced by Camden Council, including in the choice of:	
3.19 Should there be an interpretation of what ‘Considered, yet innovative complementary design’ means in the context of this Plan for Hampstead – could include excessively modern installations e.g. interactive wayfinding touch screens unless further detail on desired designs included in a Hampstead context.	Have added: Designs for elements belonging to the urban realm should enhance the character areas described in Appendix 2 and conform to guidance contained in the relevant conservation area appraisals and management strategies.	
3.21 ‘Exceptional circumstances’ – we would like to see this including banners promoting Hampstead Village as a whole as a destination or celebrating Hampstead. As a general point, there is some overlap between this section/policy and Policy TT2. Is this intentional?	<p><i>In response to Camden’s comments,</i></p> <p><i>DH3 (2) has been rewritten to read:</i></p> <p>“Advertisements on street furniture, including benches, lighting, bus shelters, guardrails, traffic lights or signals and other objects placed on the street (see Camden Planning Guidance 1, 8.10) will be resisted where they would</p>	

	<p>contribute to visual clutter, harm the character areas or hinder accessibility.”</p> <p>A new paragraph 3.20 has been added: “Designs for elements belonging to the urban realm should enhance the character areas described in Appendix 2 and conform to guidance contained in the relevant conservation area appraisals and management strategies.”</p>	
<p><b>6 Traffic and Transport</b></p> <p>6.14 Refers to a separate Servicing and Delivery Plan which ‘may be necessary to ensure servicing and delivery requirements are given due consideration’ We think this is necessary - loading/unloading – shared use for timed zones, loading bays. Is a Plan being developed?</p>	<p>The Delivery and Servicing Management Plan is a misunderstanding. This isn't a single area-wide plan, but it's a Camden requirement that each applicant needs to produce one if a development needs servicing post construction. If an estate agent's premises for example were being converted for us as a supermarket, the developers would need to provide a Delivery and Servicing Management plan to show how servicing would be done.</p>	
<p>Policy TT1 – does this person trips threshold and need for DSMP plans apply to businesses? For example where an estate agent becomes a food and drink establishment, which seems to be an aspiration through the plan, this will entail more person trips. Restrictive requirements will be a hurdle/ commercial consideration and possibly off-putting cf 2.15.</p>	<p>On the impact on business, our aim is to support business development and not restrict it. The Delivery &amp; Servicing Management Plan is a simple document and its purpose is merely to make sure that the transport impacts of a development have been considered and that reasonable measures have been taken to avoid an impact on other businesses and residents. This is only necessary where a development involves <u>additional</u> vehicle movements or trips, so most developments which are simply modifying a premises for different business use will not have to do anything. A shop changing to a restaurant would almost certainly have the same footfall and servicing needs, probably less. By contrast, if a small art gallery on Heath Street was being converted to a fast food outlet, involving twice-daily deliveries and much greater footfall, then they would just need to think about the transport impact of the change and complete a DSMP, but this is not onerous.</p>	

<p>No reference to improving parking arrangements. Tone is one of exclusivity of visitors rather than inclusivity. This contradicts the aspirations of having a thriving local economy as our businesses require a heavy footfall from customers who do not live in the Village.</p>	<p>Matters concerning street parking do fall under planning legislation.</p>	
<p>Policy TT2 – b. We would like to see this including supporting moves to replace essential street furniture with appropriate style furniture where relevant.</p>	<p>In the Transport section we can only refer to the safety or transport aspects of transport measures rather than their aesthetic value but consideration for the design of new street furniture is covered in DH3.</p>	
<p>Policy TT2 – d. We would like to see this specifically including supporting the removal of unnecessary existing street furniture as part of the Policy itself in line with 6.12 referring to Naked Streets Principle ‘removal of unnecessary street furniture, signs, signals and obstacles is strongly supported.’</p>	<p>This is supported in the Camden Local Plan 7.83:</p> <p style="padding-left: 40px;">The Council aims to reduce visual street clutter, reducing the number of objects on the street, rationalising their location and limiting the palette of materials. Free standing signs and signs on street furniture will not normally be accepted where they contribute to visual and physical clutter and create a hindrance to movement along the pavement or pedestrian footway.</p> <p>We have added a sentence under DH3, paragraph 6.21, which reads: The Plan supports Camden’s efforts to reduce the visual street clutter of street furniture, though this might be a slight repetition of DH3 (1).</p> <p>Naked Streets usually refers to shared space between cars, pedestrians, etc., by removing barriers. The Plan supports this idea in 6.16 and 6.17.</p>	
<p><b>7 Economy</b></p> <p>7.1 Aspiration is for ‘flourishing local economy that attracts businesses and creates jobs. Says that the section ‘seeks to build policies that will nurture and protect the local economy’ – but the policies are seem more restrictive than constructive.</p>	<p>By improving the quality of the built environment and the pedestrian experience, the Plan supports a vibrant town centre and popular neighbourhood centre. Preserving business space is another policy supportive of local businesses and jobs.</p>	
<p>7.6 Lack of parking noted as a key concern but – not reflected in Policy EC1 Healthy Retail Mix. More shopping, drinking, community facilities and eating opportunities might mean the need for more parking</p>	<p>The Plan’s policies must not conflict with any of Camden’s strategic policies, one of which is that all new development</p>	

<p>opportunities.</p>	<p>must be car-free.</p> <p>See Camden Local Plan T2:</p> <p><b>Policy T2 Parking and car-free development</b> The Council will limit the availability of parking and require all new developments in the borough to be car-free.</p> <p>We will:</p> <ul style="list-style-type: none"> <li>a. not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;</li> <li>b. limit on-site parking to: <ul style="list-style-type: none"> <li>i. spaces designated for disabled people where necessary, and/or</li> <li>ii. essential operational or servicing needs;</li> </ul> </li> <li>c. support the redevelopment of existing car parks for alternative uses;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>d. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.</li> </ul> <p>Street parking falls outside the remit of the neighbourhood plan.</p>	
<p>Policy EC1 - Suggest adding in 'resisting change of use retail to non-retail' or 'managing proportions of non-retail use' particularly at ground level where there are applications of change of use shops to offices; retail to services EC2 – we support – shopfronts clear of clutter, restoration of lost features etc. Can the Policy also include 'requiring that the presentation of void units is managed', particularly during the development process?</p>	<p>EC1 b) has been rewritten to anticipate the Article 4 Direction, which will remove permitted development rights currently permitting change of use from A1 to A2:</p> <p>"Resisting the change of use from A1 (retail) to A2 (estate agents, banks, building societies) that would result in less than 75% of premises in core frontages being in retail use or less than 50% of premises in secondary frontages being in retail use."</p>	

	<p>EC1 c) now reads:  “Preserving small shop and retail premises that enhance the character and vibrancy of the area.”</p> <p>Unfortunately, the management of shops while between lets falls outside is not a matter of planning law. This is something that we have looked into.</p>	
<p><b>Other</b></p> <p>As referenced in 7.2 NPPF Para 23 re Town Centres pursue policies to support their viability and vitality. Improving customer access, business access ie. parking/loading/unloading is key to this. The Plan could include an annex to this effect: see <a href="https://www.gov.uk/guidance/neighbourhoodplanning--2">https://www.gov.uk/guidance/neighbourhoodplanning--2</a>  “Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex. (from the link to NPPF referenced as Paragraph: 004 Reference ID: 41-004-20140306)</p> <p>The BID will be pleased to collaborate with the Forum to flesh out more detail in this regard.</p> <p>We trust that this feedback is helpful to the Forum in finalising the current draft of the Neighbourhood Plan and will be very pleased to discuss any of the matters we have raised in person should this be helpful.</p>	<p>The Forum would be happy to discuss with the BID any further work that we could do together but it is unlikely that creating such a document could be completed within the timescale of the Neighbourhood Plan, which is now entering the final phase following three years of preparatory work and consultation.</p> <p>We suggest that such the project that the BID suggests be done outside the scope of the Plan.</p>	
<p>Comments from the Church Row Neighbourhood Forum</p>		
<p>There has been a mini supermarket at the Hampstead Express Dairy site for many years, but it has not always been owned by Tesco. When Tesco acquired the business they fundamentally altered the nature of deliveries with the result that Heath Street is now frequently blocked with huge HGV lorries that breach traffic</p>	<p>The Traffic and Transport section does attempt to address these issues.</p>	<p>CW</p>

<p>regulations, cause grid lock, and dwarf children being delivered to school. The Plan should promote developments that are sensitive to such issues, and Tesco Heath Street should be singled out for criticism. They warrant more of a mention than the brightly coloured photography shop on page 74.</p>		
<p>Camden’s Draft Local Plan 2016 clause 4.32 states <i>“The scale and intensity of use of some community facilities, such as schools, colleges and higher education facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, impacts such as noise and air pollution and the pressure on the transport system. The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the ‘school run’. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase. Policy A1 of the Local Plan refers to how the Council will manage the impact of traffic movements.”</i> The Plan might want to adopt a similar stance in the Plan.</p>	<p>It is not the purpose of the Plan to repeat Camden policies but rather to add more detail to existing policies or to add policies not covered by existing strategic plans.</p>	
<p>It is not entirely clear what Appendix 3 will contain. On page 5 it is described as a <i>“List of listed buildings, buildings that make a positive contribution”</i>, but clause 3.9 suggests that the list will include <i>“lists of non-designated assets, Conservation Area Appraisals, and Management Strategies”</i> which implies there will be copies of the Conservation Area Statements of Hampstead (2001); South Hill Park (2001); Fitzjohn’s and Netherhall (2001) and Mansfield (2002). Which is it? The inclusion of the Area Statements as Part of the Plan would raise the question as to <i>“which set of guidelines prevails?”</i>.</p>	<p>Have changed the title of Appendix 3 to be consistent. All listed buildings are designated heritage assets. Buildings that make a positive contribution to a conservation area or appear on a Local List are considered non-designated heritage assets according to the NPPF. Appendix 3 contains a list of all designated and non-designated heritage assets including all listed buildings, buildings that make a positive contribution to the conservation areas and buildings that appear on Camden’s Local List. They are colour coded according to the conservation area in which they appear.</p>	
<p>Consideration should be given to tidying up the referencing of listed views as they can be important factors for planning applications, and are currently a bit confusing: DH1 – Page 20 – <i>“Development proposals must respect and enhance the character and local context of the relevant character area(s) by... Protecting and enhancing listed views, key views and vistas as shown on Map 4”</i>. However, Map 4 is described on pages 5 and 19 as <i>“Important views”</i> which doesn’t include key views or vistas, and page 18 states <i>“Map 4 identifies the key historic and significant views within the area as listed below (see Appendix 7 for photos and justifications)”</i> and introduces a new concept of historic views? To confuse things further page 5 describes Appendix 7 as a <i>“List of important local views”</i>? Furthermore, Map 4 is difficult to read and tie up with the descriptions on page 18. The map may need to be broken into sub maps. Appendix 7’s supporting evidence will be important, but is not currently attached. Planning decisions relating to designated and non-designated heritage assets are governed by The National Planning Policy Framework 2012 (NPPF) and subsequent National Planning Policy Guidance 2014. In particular, <i>“Paragraph 134 of NPPF requires that where a proposed development will lead to less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of</i></p>	<p>We have revised wording relating to views to be more consistent.</p>	

<p><b>the proposal</b>, including securing its optimum viable use” and “Paragraph 135 of NPPF states that “when considering applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the <b>significance of the heritage asset</b>”.</p> <p>Accordingly, the Plan might want to emphasise the “<b>significance of the views</b>” and that “<b>harm to them cannot be outweighed by any public benefits</b>”.</p>		
<p><b>Comments concerning matters outside planning law</b></p>		
<p>Clearly we are fortunate to have the Royal Free Hospital in our area but there is one major drawback. The heart of Hampstead is its High Street but this very busy thoroughfare is plagued by the high speed movement of ambulances through what is already a highly congested area. The sirens used are ear-splittingly loud and sooner or later a child or senior citizen will be knocked down. The core issue is why the ambulances must use the High Street when they can drive North using East Heath road which is not a bus route and has no traffic lights until the Whitestone pond and avoids both the High Street and Heath Street. Please add this requirement to your excellent plan.</p> <p>Can EC1 &amp; EC2 be developed to include sensitive rental/council tax management to ensure a vibrant mix of small retailers against big multiple chains &amp; brands? (c.f. the revitalisation of Marylebone through the Walden Estate rental policies)</p> <p>Parking restrictions and business rates are killing Hampstead shops. I would like to see a 20 minute free parking policy instigated as operates in Camden high street currently</p> <p>Congratulations on the very hard work and research that has been done preparing the Draft Plan. Your work on basements is particularly helpful.</p> <p>Re the Transport Section. When the borough-wide 20 mph speed limit was introduced that was less public awareness of the high level of air pollution in our streets. There must be a trade-off between the limited reduction in deaths/serious accidents with a lower speed limit as against an increase in air pollution from cars travelling at 20 mph rather than at 30 mph. I would question whether you should give blanket support to a 20 mile an hour speed limit.</p> <p>5% rise in council tax, coupled with fewer services, is unconscionable.</p> <p>Weekly rubbish collection should be restored as a matter of priority to preserve Hampstead's amenity value. Houses are now over-whelmed by enormous smelly bins. It's a disgraceful service and it damages Hampstead more than any architectural change.</p> <p>please with the help of the police and the council do more to deal with the wide spread traffic offences ie jumping the lights at the main junction in Hampstead by the tube station a great danger to pedestrians, drivers on their phones,parking on the pavement etc</p>	<p>These are not matters that the Plan can address. The purpose of the Plan is to address the use of land and the buildings on it, i.e., matters that fall under planning law rather than other legislation or services provided by the local council.</p>	



<p>Next, biggest culprit I believe is the Council and can we comment on the recycling debacle. A huge amount is spent on sending flyers and making a noise only to receive oversized bins, non/delivery of alternative means for recycling e.g. Orange bin bags. We need to be able to hold the Council to account for their collaboration with suppliers such as Veolia. Do we have a policy linking refuse collection to design and conservation of street safety and aesthetics?</p>		
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