

Hampstead Neighbourhood Forum: responses to comments on submitted Plan

Note to the examiner:

Thank you very much for reviewing our Neighbourhood Plan.

Below are the representations mentioned in your letter of 13 January.

We had not previously seen these. Our responses to Camden's comments are in the right-hand column. So too are responses to TfL's comments, so as to include all proposed changes in one document. TfL's comments are at the bottom of the document.

Red text indicates proposed insertion of new text. Strikethrough indicates proposed deletion of submitted text.

The letter from Andy and Kate Hobsbawm appears to refer to the Camden Local Plan. The Hobsbawms live in Highgate and would not be affected by the Hampstead Neighbourhood Plan.

We have included below a response regarding the comments from Pat Newby, Save our Street.

Please note that we did not intentionally omit TfL in the Regulation 14 consultation. TfL was not listed as one of the statutory consultees in the [Schedule 1 list of consultation bodies](#) nor in the helpful list provided to us by Camden. The Forum did try to contact TfL between March and June 2024 for input and advice, but received no response.

While writing these responses, we have noticed some typos and small infelicities in the submitted Plan. These will be corrected once all the necessary processes have been completed. They do not affect the substance.

We stand ready to answer any questions about our responses.

Thank you.

Alex Nicoll
Chair
Hampstead Neighbourhood Forum

31 January 2025

Policy/para. ref	Council comment	Response from Forum
DH1 (c)	<p>“For extensions, they are subservient to the original footprint and mass of the house, contribute positively to the character of the area and provide biodiversity net gain (BNG)”</p> <p>BNG has been introduced as a statutory process with national mandatory requirements (that apply irrespective of local planning policy). Whilst, we agree it is desirable to seek gains/biodiversity enhancements through householder development, the statutory position is that such schemes will typically be exempt. We consider</p>	<p>Redraft to read:</p> <p>c) For extensions, they are subservient to the original footprint and mass of the house, contribute positively to the character of the area and enhance biodiversity.</p>
	<p>it would be appropriate to recast the criterion to refer to biodiversity ‘enhancements’ rather than mandatory BNG.</p>	
DH1 (g)	<p>“Privacy”: the Camden Local Plan specifically refers to ‘visual privacy’ to distinguish from more generic considerations of privacy which may go beyond what planning is able to influence. We note a dictionary definition of privacy as, “the right to be let alone, or freedom from interference or intrusion”. It would therefore be helpful if the text referred to <u>visual</u> privacy</p>	<p>Redraft to read:</p> <p>g) They protect the residential amenity and visual privacy of neighbouring properties</p>
3.21	<p>“Where an applicant claims that no viable use of a heritage asset can be found and therefore proposes demolition, the applicant first will be required to market the heritage asset at fair market value to potential buyers for a medium period of time of five years.”</p> <p>We understand that this wording is intended to expand on para. 207(b) of the National Planning Policy Framework. We consider it would be preferable to simply cross-reference the material in the NPPF as having similar but different wording in the NP for national conservation policy</p>	<p>Delete paragraph 3.21, as removing minimum period of 5 years would render policy weaker than 214 of NPPF.</p>

	could give rise to confusion.	
DH3 (1)	<p>“Use of low embodied energy materials and technologies, such as timber, timber projects, lime, etc.”</p> <p>We suggest substituting ‘carbon’ for “energy”. In this context, embodied carbon is more appropriate as this refers to the emissions associated with the materials and construction process throughout the whole lifecycle of a building/infrastructure.</p> <p>We are also not clear what is meant by the term “timber projects” or how this differs from simply “timber” (?)</p>	<p>Redraft DH3 (1b) to read: Use of low embodied carbon materials and technologies such as timber, timber products, lime, etc.</p>
(2)	<p>“The Plan supports net zero carbon development and expects all development to meet the highest environmental standards”</p> <p>It is not clear whether meeting the “highest environmental standards” would entail “net zero carbon” in all cases. If this standard is not achievable, the Plan needs to clarify whether the applicant would then be required to make an offset payment as per the London Plan?</p>	<p>Redraft to read: The Plan supports net zero carbon development, and expects all development to meet the highest environmental standards, while preserving the significance of any heritage asset.</p> <p>a) Development should reduce greenhouse gas emissions through minimising both annual and peak energy demand by following the steps of the Energy Hierarchy. The Plan requires major development to demonstrate how it achieves greenhouse-gas reduction targets at least equal to the New London Plan 2021 targets under Policy SI 2. Where this is not feasible after maximizing on-site reductions, developers will be required to make a cash-in-lieu contribution to Camden's carbon offsetting fund, in line with the London Plan requirements.</p> <p>b) All new build should achieve at least net zero carbon and will be encouraged</p>

		to be net energy positive. within the constraints of existing development policies. c) Conversions or extensions of 250sqm should aim to achieve operational net zero, i.e., no fossil fuels are used and all energy use has been minimized and generated by renewables.
(2) (b)	“within the constraints of existing development policies” – this is superfluous as this matter is addressed by paragraph 48 of the National Planning Policy Framework	See above
(2)(c)	The policy refers to “operational net zero” – however, the supporting text does not explain what this means. We consider that a definition should be added: i.e. where no fossil fuels are used and all energy use has been minimised and generated by renewables	See above


3.25	The 2018 Historic England evidence mentioned has been replaced by this document as of July 2024: HEAG321 Adapting Historic Buildings for Energy and Carbon Efficiency	Redraft to read: 3.25 Historic England, in its guidance document, Adapting Historic Buildings for Energy and Carbon Efficiency (2024), Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency (2018) , sets out a ‘whole building approach’, which includes an understanding of a building and how it performs and prioritises interventions that are proportionate, effective and sustainable. “As a general rule, small-scale interventions should be considered before more substantial ones, and should be reversible where possible.”
3.44 and 3.45	The Council understands the rationale and concurs that the use of performance bonds (for timely delivery) could be desirable in some circumstances but this is not something that planning system is able to control.	Redraft 3.44 and 3.45 to read: 3.44 For large, complex projects, developers are encouraged to consider measures that ensure timely project completion and minimise disruption to the community. While the planning system cannot mandate specific completion

	Developers/Householders are free to determine the pace of their construction programme. We therefore consider that reference to the bond is removed from the document.	timelines, developers are urged to implement robust project management practices and maintain open communication with affected residents throughout the construction process.
3.38	This paragraph of supporting text does not seem to fit with any of the criteria in the policy, we consider this should be removed	Will remove 3.38.
DH4 (3)	A Circular Economy Statement is separate from a CMP – we consider that the reference to it in the policy should be removed	Redraft to read: 3. Developers must include in any Construction Management Plan (CMP): a) a Circular Economy Statement in-line with the London Plan; a) a noise management plan; and b) provisions for employing vehicles on no more than 7.5 tonnes unladen weight (see Policy TT1 (4)).

DH4 (6)	<p>We consider that the Considerate Constructors Scheme (CCS) provides a useful mechanism for raising construction standards and managing impacts on the community. The current approach is that where a Construction Management Plan (CMP) is required, the Council will expect the applicant to sign up (and be compliant) with this scheme.</p> <p>CMPs are required for all major developments but also for minor developments in specific circumstances, e.g. where there would be a significant impact on the adjoining properties, there is poor/limited access or access involves moving vehicles along narrow residential streets. The full range of circumstances are set out in Camden Planning Guidance: Amenity 2021. The Council charges a fee for the review and approval of a CMP; developers also have to pay when securing compliance with the Considerate Constructors Scheme.</p> <p>Paragraph 56 of the NPPF states that planning conditions must be necessary, relevant to planning and reasonable. We consider it would not be reasonable to require applicants to sign up for CCS where no CMP is required. Further, it is particularly difficult to enforce a condition where it relies upon compliance with other legislation/procedures (outside of planning). We note that the 3 month threshold in the draft NP would likely be exceeded by the vast majority of developments. We consider that the approach of linking CCS with the CMP is the most appropriate and effective way of dealing with these issues and recognises the limitations in which the Council operates. The Neighbourhood Plan may however seek to encourage CCS for schemes where a CMP is not required but for the reasons set out above, this would be at the applicant's discretion and would not have a bearing on whether planning</p>	<p>This proposed requirement reflects strong feeling within the Hampstead community about projects that have lasted for unacceptably long periods and have caused unacceptable harm to residents living near long-running and badly-managed projects. We were aware that Camden 'expects' projects with CMPs to sign up for the CCS. What we were seeking to do was to add a level of requirement. The result was the language in the draft which is being examined. We consider it reasonable for a Neighbourhood Plan to introduce such a requirement as it responds to particular circumstances that have arisen in the Neighbourhood Plan area – that is, that the 'expectation' of the Council has not been enough to foster orderly behaviour by developers and contractors in our area. We know that being registered with the CCS may have only limited effect.</p> <p>Therefore, we would like to keep the proposed language of DH4 (5). We can accept that DH4 (6) would be difficult to apply in practice and we are willing to drop it as a requirement. Therefore, we propose to retain DH4 (5) but re-draft DH4 (6) as follows:</p> <p>6. Sites where development is unfinished three months after the start of work are encouraged to be registered with the Considerate Constructors Scheme, and registration details displayed on the site.</p>
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	consent is granted.	
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DH5 (4) (b)	<p>“Incorporating building-scale renewable energy generation such as solar panels where feasible”</p> <p>We understand that the acceptability of such proposals would need to be considered in the context of wider heritage and conservation policies/considerations, including Policy DH3 (1)(a): it would therefore be beneficial to cross-reference this policy to make this clear</p>	<p>Redraft to read:</p> <p>b) Incorporating building-scale renewable energy generation such as solar panels where compatible with design and heritage policies, such as DH3 (1).</p>
(4) (e)	<p>“Ensuring construction management minimises waste and pollution”: this refers to a process rather than an enhancement to the public and therefore, doesn’t fit with the other physical interventions listed; we consider the text should be removed</p>	Remove (4) (e)

Page 30	<p><u>Strategic site – Queen Mary’s House</u> As highlighted above, biodiversity net gains are based upon a national statutory scheme using a set formula. Any requirement under BNG would need to be determined at the time a specific scheme is submitted (and based on site conditions). We therefore suggest the text refers to a scheme providing biodiversity ‘enhancements’ recognising that the requirements for BNG will need to be determined as and when a planning application is submitted.</p>	<p>Redraft to read: a) Will enhance biodiversity</p> <p>Also, all of the clauses in this section have been lettered ‘a’’. This will be corrected.</p>
Page 30	<p><u>Royal Mail Hampstead Delivery Office, Shepherds Walk</u> The photo shows the former police station in Rosslyn Hill, not the Royal Mail Hampstead Delivery Office. While we agree that employment could potentially form an element of the land uses provided within this site, this should not result in a lower housing capacity than is already set out in the Council’s Draft New Local Plan (ie. 45 additional homes). It would be helpful if this indicative housing target could be acknowledged in the NP given the urgent need for all sites in the emerging Local Plan to deliver the requisite no. of homes (where sites provide less/no housing, this inevitably means that the ‘shortfall’ would then need to be made up on other sites in the Borough)</p>	<p>Will replace with this photo:</p>  <p>Redraft to read: Redevelopment of the Delivery Office should also meet Policies HC1, DH1, DH2, DH3, DH4 and Camden draft Local Plan.</p> <p>Redeveloping could meet the housing requirements of the draft Camden Local Plan (45 additional homes) while providing vibrant live/work units to replace the many traditional workshops and studios that have been lost through the re-development of Hampstead. Live/work spaces contribute vibrancy, jobs and economic stimulus to neighbourhoods.</p>
Page 33	<p>“The Act applies to all development, including small gardens, with some exemptions” – this wording does not reflect that householder schemes will be exempt (such as home extensions, conservatories and loft conversions)</p>	<p>Redraft to read: 4.6 In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act</p>

		<p>2021) with exceptions depending on the size and type of development.</p> <p>4.7 The Act applies to all development, including small gardens, with some exemptions. Biodiversity in Hampstead is supported not only by the Heath and identified corridors but traditionally by individual gardens and green spaces in almost all of this Plan's character areas.</p>
NE1(2)	"The Plan encourages all development" – we assume this refers to all <u>residential</u> development	<p>Redraft to read:</p> <p>NE1(2) The Plan encourages all residential development</p>
NE2 2(b)	<p>"consider ways to improve connectivity in Network Priority Areas (refer to Map 5 above) between the Biodiversity Corridors":</p> <p>the circles showing 'Network Priority Areas' drawn to the far left and right do not seem to entirely match with the location of the proposed corridors: this is likely to lead to confusion about which sites will be</p>	<p>We propose revising Map 5, replacing the circles with pink lines, like the green lines for the biodiversity corridors, to more clearly delineate which properties would be included. This policy supports Paragraph 180 (d) of the NPPF.</p> <p>If necessary, we could revise 2(b) to read:</p> <p>where possible, consider ways to improve connectivity in Network Priority Areas (refer to Map 5 above) between the Biodiversity Corridors</p>
	<p>expected to contribute to connectivity improvements. Unless and until the corridors are strengthened (and any gaps restored), it may be difficult to justify making enhancements in these particular locations. Without evidence to justify the Priority Areas, we consider they should be removed.</p>	

4.21	<p>“The sites in the Hampstead Neighbourhood Plan Area listed above, (see Map 6 and Appendix 3) are to be designated as Local Green Spaces as defined in the NPPF. Each of these sites complies with the criteria that it is in close proximity to the community it serves, is local in character and not extensive, and is demonstrably special to a local community and holds a special significance. A list of designated LGSs is given in the appendices with evidence to support the designations. Additional information on each site is in our Evidence Base, Natural Environment, Local Green Spaces file”</p> <p>- the text needs to be clearer that none of the local green spaces are being proposed as part of this update – they are in fact already designated on the Council’s Policies Map and will be rolled forward upon adoption of the revised Plan</p>	<p>Redraft as follows: 4.21 The sites in the Hampstead Neighbourhood Plan Area listed above, (see Map 6, Appendix 3 and Appendix 6) are to be designated as Local Green Spaces as defined in the NPPF. Each of these sites complies with the criteria that it is in close proximity to the community it serves, is local in character and not extensive, and is demonstrably special to a local community and holds a special significance. A list of designated LGSs is given in the appendices with evidence to support the designations. Additional information on each site is in our Evidence Base, Natural Environment, Local Green Spaces file.</p>
4.31	<p>It would be preferable to include the appendix of Important Trees at the back of the main plan for greater visibility and to aid decision making</p>	<p>Under contents on page three, add 9. List of Veteran and Important Local Trees. Remove this as appendix 4. Renumber Appendix 5 and Appendix 6.</p>
NE4 (1)	<p>“Development proposals affecting trees” – the aim of the planning process is to identify possible impacts and consider whether they can be avoided and if not, how they might be mitigated. Therefore we consider minor rewording would be beneficial: ‘Development proposals <u>affecting that have the potential to affect trees</u>’</p> <p>“supported by a landscaping scheme” – this is correct but we also require applicants to provide us with tree protection details (a separate document). Therefore we consider amending as follows: ‘supported by tree protection details in accordance with the most recent version of BS 5837 and landscaping details that demonstrate...’</p>	<p>Redraft to read: 1. Development proposals affecting that have the potential to affect trees should be supported by tree protection details in accordance with the most recent version of BS 5837 and landscaping details that demonstrate:</p> <p>4.36 Tree protection guidance is provided in BS5837 2012),</p>

	<p>We welcome the references in this policy and the supporting text to BS 5837, however the new version of 5837 is now out for consultation, consequently, references to “2012” should be removed as this document will soon be superseded</p>	
(1) (a)	<p>“How trees retained on site” – suggest adding ‘<u>and neighbouring sites where appropriate</u>’ as we will seek to retain trees beyond the site boundary</p>	<p>Redraft to read: How trees retained on site and neighbouring sites where appropriate</p>
(1) (c)	<p>“Where feasible includes the planting of trees. Unless it can be demonstrated as unfeasible or non-viable, development should allow space for the future planting of trees well suited to local conditions.”</p>	<p>Redraft to read: c) Where feasible includes the planting of trees. Unless it can be demonstrated as unfeasible or non-viable, development should allow space for the future planting of trees well suited to local conditions. Provide for the new planting of trees unless this is unfeasible.</p>
	<p>The text is slightly confusing as it seems to refer to both actual tree planting and merely providing space for trees. We consider this criterion should be amended as follows: ‘Provide for new planting for trees unless this is unfeasible’</p>	
(2)	<p>“details of replacement tree planting to mitigate against the loss of canopy cover” – this will not always be feasible, we consider the following clarification should be added: ‘...<u>where site constraints allow</u>’</p>	<p>Redraft to read: 2. Any development that proposes removal of a tree on the Important Tree List (see Appendix 4) should include, within the application, justification for the removal(s) and details of replacement tree planting to mitigate against the loss of canopy cover where site constraints</p>

		allow.
4.34	<p>“and >1.5m in height are present” – we are not sure of the origin of this standard, it is not commonly used. Therefore, we consider it should be removed.</p> <p>It would helpful to clarify at the end of this paragraph that these documents should be <u>‘in accordance with the latest version of BS 5837’</u></p>	<p>Redraft to read: 4.34 Development proposals where trees > 7.5cm in trunk diameter at 1.5m from ground and >1.5m in height are present (on-site or off-site) which have root protection areas or canopies that encroach onto the application site or could be affected by development, its plant or vehicles in any other way, are to be accompanied by a tree survey, arboricultural impact assessment, tree protection plan and an arboricultural method statement in accordance with the latest version of BS 5837.</p>
Page 45	“Source British Geological Survey 1920” – it would helpful to clarify that this text refers to the adjacent map not to the text immediately above	<p>Redraft caption to read: Map: British Geological Survey 1920</p>
5.10	<p>“These conditions include unusual and unstable soils”: the soil conditions are not ‘unusual’ as such: there are many locations with similar soil types and topographical conditions. We therefore consider the text “unusual and” should be removed</p>	<p>Redraft to read: These conditions include unusual and unstable soils,</p>
BA1 (c)	This text relating to Basement Construction Plans is superfluous as this is already covered by text in part 3 of the policy.	Remove BA1 (c) and change d) to c).
BA1 3 (a)	<p>“the character and amenity of the building or wider area, the significance of heritage assets, or any other identified potential harm” We consider these matters should be deleted as they are not addressed as part of a Basement Construction Plan</p>	Remove BA1 3 (a) and renumber b) and c)
5.12	Should refer to Basement Impact Assessment (with capitals)	<p>Redraft to read: When a Bbasement Impact Aassessment</p>

5.12 and 5.12 (a)	<p>While the opening sentence refers to “<u>encouraged</u> to consider”, part (a) states that these samples “must be” provided to the depth indicated, which is contradictory. We consider that, to reflect site circumstances/ the nature of a specific basement scheme, references to “must” are replaced by ‘should’.</p> <p>It would also be helpful to clarify that any site investigation (boreholes, sampling, testing, monitoring) should be determined on a <u>site specific basis</u> and in accordance with the screening and scoping stages of the Basement Impact Assessment.</p>	<p>Redraft 5.12</p> <p>a) a) CPG – Basements and the Camden Geological, Hydrogeological and Hydrological Study (paragraphs 285-294) should be studied whenever hydrological borehole measurements are to be carried out. Soil samples, including those near boundaries with neighbours must should</p>
5.12 and 5.12 (a)	<p>“The boreholes measurements may need to be conducted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons”</p>	<p>Redraft to read:</p> <p>The boreholes measurements may need to be conducted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons or suitably conservative assumptions made.</p>
	<p>This may not be necessary for every scheme. Therefore, we consider adding the following for clarity “<u>or suitably conservative assumptions made</u>”</p>	
5.12 (b)	<p>“In some cases, when boreholes measurements show a groundwater risk”</p> <p>For clarity it would be better to say ‘risk to or from groundwater’</p>	<p>Redraft to read:</p> <p>b) In some cases, when boreholes measurements show a risk to or from a-groundwater risk, an automatic log water measurements</p>

5.12 (c)	<p>“an assessment should demonstrate....at the time of the construction phase’ This restricts the damage to that which might occur during the construction phase. Although that is the most critical stage, it would be better to pick up the potential long-term impact, i.e.: ‘the predicted damage resulting from basement construction is no more than Burland Scale 1’</p> <p>The zone of influence can differ depending on the basement being constructed/its location. We therefore consider the wording should be amended to read:“(typically a distance of <u>approximately</u> twice the depth of the basement from the point of the excavation)”</p> <p>“also demonstrate that the <u>data entered</u>, methodology and supporting engineering calculations” Building damage assessments do not always need data, therefore we consider this should instead refer to: ‘assumptions made’</p> <p>“see also 5.19” This paragraph relates to the CMP not the BIA; we therefore consider that this text should be removed</p>	<p>Redraft to read: c) An assessment should demonstrate that the predicted Burland Scale at the time of the construction phase damage resulting from basement construction is no more than Burland Scale 1 throughout the building and each neighbouring building that has any part within the zone of influence (a distance of twice the depth of the basement from the point of the excavation typically a distance of approximately twice the depth of the basement from the point of the excavation). The assessment must show the location of the predicted impact and also demonstrate that the assumptions made data entered, methodology and supporting engineering calculations are all submitted and stand up to scrutinysee also 5.19).</p>
5.12 (j)	<p>“The team preparing the BIA and the BIA audit should always visit the site of a proposed excavation”</p> <p>LB Camden use the services of an engineering consultants to independently audit BIAs submitted by applicants – there is an existing agreement between the Council and Campbell Reith regarding the scope of their services. The Neighbourhood Plan cannot compel the Council to make variations to this agreement: we do not agree that it is necessary for the auditor to visit sites as suggested (and this is not presently funded through the fee for the BIA paid by</p>	<p>Delete: j) The team preparing the BIA and the BIA audit should always visit the site of a proposed excavation.</p>

	applicants).	
5.13	<p>“To gain planning permission”</p> <p>We agree that in some circumstances the Council will require a Basement Construction Plan but this does not need to be provided prior to planning permission being granted. We therefore consider that this text should be removed</p>	<p>Delete:</p> <p>5.13 To gain planning permission, developers need to demonstrate with appropriate evidence that the proposal would comply with Policy A5 of the Local Plan.</p> <p>Camden Planning Guidance—Basements provides detailed guidance on requirements for Basement Construction Plans. The implementation of Basement Construction Plans will be secured by planning obligations (Local Plan paragraph 6.127</p>
BA2	<p>A CMP would not be required by the Council for every basement scheme, e.g. small extensions to an existing basement. It would</p>	<p>Redraft to read:</p> <p>Where a Construction Management Plan (CMP) is required by the Council, the CMP should include information on how: Proposals for basement development should be accompanied by a Construction Management Plan which includes adequate information to assess the impact of the construction phase, should the proposal be approved. The CMP should include information on how:</p>
	therefore be helpful if the start of the policy read: “Where a CMP is required by the Council....”	

BA2 (2)	<p>“Details of site operation hours (see 5.24 below)”</p> <p>This text is superfluous as this matter is now addressed in the main policy text, i.e. part 4.</p>	<p>Redraft as follows:</p> <p>2. Traffic and construction activity will be managed to protect the residential amenity of adjoining occupiers, the integrity of public structures and buildings and the safety of pedestrians, cyclists and other road users. The CMP should, include details of the routing of demolition, excavation and construction vehicles, details of access, including deliveries, storage, location of nearby trees, footways and carriageways.</p> <p>Details of site operation hours (see 5.24 below).</p>
6.14	<p>The wording in this paragraph is a little confusing.</p> <p>The Council's Camden Planning Guidance: Transport 2021 already takes a comprehensive to dealing with Delivery and Servicing Plans and most/all of the considerations mentioned are addressed (in para. 4.11) as part of this approach. We therefore suggest that text reads: ‘The need for a Delivery and Servicing Plan (DSP) should be identified in the Transport Assessment. DSPs can be used to manage and mitigate the potential impacts of deliveries and servicing on the amenity and safety of the general public. They must be structured around the themes/issues identified in para. 4.11 of Camden Planning Guidance: Transport 2021’</p>	<p>Propose to keep 6.14 as submitted, as in the existing Plan</p>

6.17	<p>The wording in this paragraph could be expressed more clearly as follows:</p> <p>‘The adopted national, regional and local policy and planning guidance sets out the principles that developers should follow to ensure schemes are policy compliant, properly mitigated and where appropriate, provide benefit for local stakeholders. The Council will secure financial contributions (through a planning obligation) from major developments for transport improvement schemes when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions.’</p>	Propose to keep 6.17 as submitted, as in the existing Plan
TT1 (1)	<p>“significant number of additional motor vehicle journeys post- completion”: this is defined in the supporting text at para. 6.20 as developments generating an additional 100 or more person trips a day.</p> <p>Camden Planning Guidance: Transport (2021) uses established thresholds for Transport Assessments and Statements which depend on the scale of developments. The Council considers that the existing approach is proportionate and effective in managing local transport impacts where these arise. We do not consider that an arbitrary limit of 100 or more person trips per day is justified by supporting evidence. Therefore, we consider reference to this threshold should be removed</p>	We propose to keep 6.20 as submitted, as in the existing Plan
TT1 (1)	<p>There appears to be a typo: “Together this information should demonstrate (if necessary, through mitigation measures) that the impact of any such vehicle</p>	

	<p>journeys will be offset so that approval will not lead to an overall decrease <u>increase</u> in air quality in the Plan Area.”</p>	<p>Replace “decrease’ with “reduction.”</p>
TT1 (2)	<p>“Where a Travel Plan is approved in connection with an application it should include provision for an annual monitoring report to be submitted to Camden Council for the first five years following construction <u>occupation</u>.” This should say occupation rather than construction as this is the established procedure.</p> <p>“First five years”: Travel Plans are required in Years 1, 3 and 5 following the occupation of a development rather than every year for 5 years.</p>	<p>Redraft to read: Where a Travel Plan is approved in connection with an application it should include provision for an annual monitoring report to be submitted to Camden Council in years 1,3 and 5 for the first five years following construction occupation</p>
6.24	<p>“The DSMP should reflect all reasonable expectations of the delivery and servicing requirements associated with the proposed land use at the time of the application and where a future owner wishes to go beyond the provisions set out in the relevant DSMP, a new planning consent will be necessary”</p> <p>DSPs/DSMPs are generally secured by S106 and can be amended from time to time as necessary by the submission of a new DSP for review by the Council.</p> <p>Expecting a wholly new planning application to be submitted in order to vary an existing DSP would be unreasonable and impose a disproportionate burden on owners/applicants. As this paragraph addresses matters beyond what a neighbourhood plan is able to influence (use of planning obligations), we consider it should be removed.</p>	<p>Redraft 6.24 to read: As with other planning matters, Where a planning application is granted, the provisions of any associated DSMP will apply to future beneficial owners of the land or property described. The DSMP should reflect all reasonable expectations of the delivery and servicing requirements associated with the proposed land use at the time of the application and where a future owner wishes to go beyond the provisions set out in the relevant DSMP, the Council’s prior agreement to vary those provisions may be necessary.</p>

6.32	In response to TfL suggestions.	Redraft 6.32 to read: To make streets more welcoming for pedestrians, Policies T2, GG3 and D8 of the London Plan, (which incorporate the Mayor's Healthy Streets approach) require development to reduce the dominance of vehicles, to increase the permeability of streets, remove unnecessary street clutter and avoid barriers to movement that create severance for pedestrians and cyclists so that pedestrians can cross the street more easily. The Camden Transport Strategy 2019-2041 establishes a hierarchy of road users, giving priority to pedestrians ahead of all other modes of travel, while Policy T1 of the Camden Local Plan seeks to ensure that developments improve the pedestrian environment.
6.42	In response to TFL comments (note: data was downloaded from TFL website)	We propose to present Fig. 6.9 as a bar graph rather than a line graph. We could also show the ward boundary outline more clearly.
6.42	In response to TFL comments:	Redraft 6.42 to read: Transport for London's 2014 analysis (the latest published) shows that the Hampstead Town ward has a relatively low PTAL scores compared with other inner suburban areas and with Camden as a whole. Of the population of Hampstead Town Ward, 71% live at locations with PTAL scores of 0-3, compared with the average for Camden as a whole of only 29%. Overall, Hampstead has a PTAL score of 4.0%, below the score of 5.6% for the borough as whole. which is noticeably below the borough-wide score of 5.6 for Camden. 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.
6.43	In response to TFL comments:	Redraft 6.43 as follows: The TfL map reproduced here at Map 9 shows that connectivity in the most populated part of the Plan Area is closely associated with bus provision, despite the Underground and Overground stations at the western and southern boundaries of the Plan area. South End Green, at the

		<p>extreme south of the HNF area is served by four regular bus routes, two of which pass through popular areas of the West End and central London on their way to their final destinations to the South or South-west of the city centre. However, both routes terminate at South End Green. The remaining 90% of the Plan Area (including Hampstead Town) is served by only two regular routes, one of which is a local service only, offering limited connectivity with journeys of less than 2km from Hampstead.</p>
6.44	<p>“Sites located in areas of better connectivity permit residential development at higher densities together with the use of buildings for public or educational purposes. They also permit car-free development. Areas without good connectivity are not suited to these purposes unless development is made sustainable through corresponding improvements in public transport”</p> <p>It should be noted that the car free approach in Policy T2 of the Local Plan applies to all residential development (with some exceptions) in Camden including the whole of Hampstead</p>	<p>Redraft 6.44 to read:</p> <p>“Sites located in areas of better connectivity permit residential development at higher densities together with the use of buildings for public or educational purposes. They also permit car-free development. Areas without good connectivity are not suited to these purposes unless development is made sustainable through corresponding improvements in public transport”</p>
TT3 1(b)	<p>“Applications which can reasonably be expected to result in an average of 100 or more additional person-trips per day (including servicing) post completion”</p> <p>As for TT1(1) above, Hampstead Town Centre would be considered a relatively accessible location for shops and services. The cap on numbers seems arbitrary for a town centre location and could inhibit development that may otherwise be acceptable in policy terms. It would be contrary to the NPPF’s (para. 86) requirement that “planning policies should: a) set out a clear economic vision and</p>	<p>Propose to amend TT3, reverting to the criterion used in the existing Plan, with a change of target date.</p> <p>Redraft to read as follows:</p> <p>Due to the traffic congestion and air quality issues in the Plan Area there is disproportionate harm which small localised peaks in demand for travel can cause:</p> <p>1. The following types of development will be supported where they are located on sites with a Transport for London PTAL score of 4-5 or over, up to 2030, and a score of 5 or over thereafter:</p> <p>a) Sites used predominantly for medical, care or educational purposes. b) Applications which can reasonably be expected to result in an average of 100 or more additional person-trips per day (including servicing) post completion.</p> <p>2. In circumstances where a site’s PTAL score is less than 4 or 5, paragraph 1 of</p>

		this policy may be waived provided that public transport improvements necessary to elevate the site's PTAL score to 5 or over from completion are secured, or a Travel Plan produced which would provide good accessibility to the new development with measures to mitigate harm from congestion and air pollution. Planning obligations should be used to secure these results.
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	strategy which positively and proactively encourages sustainable economic growth". Without further justification, we consider this threshold should be removed. TfL's comment considers PTAL level of 5 unduly restrictive.	
6.57	In response to TfL. On this, please see our response below to "Save Our Street".	Redraft to read: The road system in South End Green poses particular problems for pedestrians who must negotiate busy lanes of traffic to get from one side to another. The Green itself is an isolated traffic island, with traffic and bus stands all around it, substantially diminishing the pedestrian experience and destroying visual sightlines of what could otherwise be a pleasant and vibrant neighbourhood centre. Nearby streets suffer from traffic congestion, poor air quality and, in some stretches, a lack of street trees and planting.
6.58		Amend first sentence of 6.58 as follows. Improvements to the London Overground service have led to substantial volumes of passengers using Hampstead Heath station.
Policy EC2 (4)	"Security measures that do not detract from the streetscape, including toughened glass and the strengthening of shop fronts, will be supported. External security shutters, grilles or meshes will not be supported" It is not clear what is meant by the "strengthening of shopfronts". The wording could potentially be simplified: 'Security measures should not detract from the streetscape. Therefore external security	Redraft to read: 4. Security measures should that do not detract from the streetscape. Therefore , including toughened glass and the strengthening of shop fronts, will be supported. External security shutters, grilles or meshes will not be supported

	shutters, grilles or meshes should be avoided’.	
Fig 7.7	<p>80 Rosslyn Hill (Snappy Snaps)</p> <p>The Neighbourhood Plan does not explain why the image of this shopfront is an “inappropriate use of materials and unsympathetic treatment of details”. Since the current neighbourhood plan was adopted in 2018, the Council has granted advertisement consent for the ‘Display of 3 x externally illuminated timber fascia signs and 1 x non-illuminated hanging sign’ (ref: 2019/544/A) which we consider has improved on the situation when the 2018 NP was being drafted (80 Rosslyn Hill is also identified in the 2018 NP).</p> <p>As part of the assessment of the Council’s assessment of this application, it was found that “the proposed timber fascia boards (on the upper fascia) and new spotlights would address the harm caused by the currently cluttered state of the commercial frontage in terms of size, design, materials to be used, location and method of illumination (spotlights)...” They also considered the fascia boards to be acceptable when assessed against relevant Local Plan policies and Policy EC2 of the adopted Hampstead Neighbourhood Plan. Similarly, a hanging sign made of timber was found to be acceptable in terms of size, design, materials, location and the lack of illumination and again, in accordance with Local Plan and Neighbourhood Plan policies.</p> <p>The shopfront has therefore recently been assessed and found to be compliant with Local Plan and</p>	Delete Fig 7.7 and 7.8 (Snappy Snaps and William Hill) and caption.

	<p>Neighbourhood Plan policies. As part of the assessment of the application, the Council considered objections raised about the branding on the fascia and the colour scheme – it was considered that the hand painting onto timber was a positive feature consistent with the location in a conservation area but the Officer's report also states that advertisement consent controls did not provide the Council with the power to resist the colour being used. It is therefore difficult to see what more could be done to improve the shopfront via the planning process. There are also other premises in this frontage/part of the Town Centre which appear to be similar or (subjectively) worse, yet do not appear in the Neighbourhood Plan.</p>	
	<p>As the shopfront has materially improved over the last decade as a result of negotiations between the Council and landowner (as evident in Google StreetView), we consider the text about the inappropriateness of the signage is out of date and should be removed</p>	

Fig 7.8	<p>25 South End Green (William Hill)</p> <p>The signage here is not high quality but it is no worse than a number of shopfronts in this location/centre. The current signage is also a marginal improvement on the pre-2015 situation (as Google StreetView shows).</p> <p>If images of poor shopfronts are to remain in this section, it would be preferable to include a wider section and possibly stretches of frontage rather than singling out individual businesses. This could be accompanied by a brief narrative setting out the kinds of measures that might be deployed to enhance the shopfronts</p>	See above
HC1	<p>“the loss of dwellings except in certain circumstances mentioned in 8.6 below” Typo: should be 8.6 <i>above</i></p>	<p>2. Housing conversions will not be supported which would result in the loss of dwellings except in certain circumstances mentioned in 8.6 below <i>above</i>. Small self-contained dwellings, either studio or 1 or 2 bedrooms are particularly crucial in the Plan area for providing more affordable housing.</p>
8.10	<p>“above-listed” - should be assets listed <i>below</i></p>	<p>8.10 The Plan supports ways to increase the use and the availability of the above-listed <i>below</i> assets to the wider community; for example, increasing the use of school facilities outside school time. Many of the area’s places of worship offer diverse cultural programmes and venues for community activities, which the Plan also supports</p>
HC2 1 (b)	<p>Suggestion from consultation</p>	<p>Redraft to read:</p> <p>b) Arts, libraries, facilities, and museums</p> <ul style="list-style-type: none"> ▪ Keats Community Library ▪ Fenton House (National Trust) ▪ Keats House ▪ Pentameters Theatre ▪ <i>Well Walk Theatre</i> ▪ Everyman Cinema ▪ 2 Willow Road (National Trust) ▪ Hampstead Observatory

		<ul style="list-style-type: none"> ▪ St Stephen's, Rosslyn Hill
HC2	<p>Under the Use Classes Order, Hampstead Post Office, Royal Mail Hampstead Delivery Office, Shepherd's Walk and Barclays Bank Hampstead High Street would not be considered 'community facilities' (ie. they do not fall within Use Class F).</p> <p>The Post Office and bank would fall within Class E. The Council has no ability within the planning system to require re-provision of a bank or post office in these centres. While we recognise residents' concerns about maintaining convenient access to these services, the location/number of branches are commercial decisions.</p> <p>The Delivery Office supports a commercial distribution operation (provided by IDS PLC). A planning proposal on this site would not be required to provide a community use. The Council does not have the power to compel IDS PLC or the Post Office to provide postal services/delivery collection from this site</p>	<p>Redraft to read: Policy HC2: Community facilities</p> <p>1. The Plan will resist the loss of facilities, sites and functions listed below unless a replacement facility that meets the needs of local residents is provided or the specific community facility is no longer required in its current use:</p> <p>a) Community activities & support (charities, local authority, and health)</p> <ul style="list-style-type: none"> ▪ Burgh House ▪ Hampstead Community Centre & Market ▪ Henderson Court and Munro House ▪ Queen Mary's House ▪ The Armoury Gym ▪ Park End Surgery (NHS) ▪ Keats Group Practice (NHS) <p>b) Arts, libraries, facilities, and museums</p> <ul style="list-style-type: none"> ▪ Keats Community Library ▪ Fenton House (National Trust) ▪ Keats House ▪ Pentameters Theatre ▪ Well Walk Theatre ▪ Everyman Cinema ▪ 2 Willow Road (National Trust) ▪ Hampstead Observatory ▪ St Stephen's, Rosslyn Hill <p>c) Schools</p> <ul style="list-style-type: none"> ▪ One secondary and 10 primary schools <p>d) Independent companies or organisations with important community benefits.</p> <ul style="list-style-type: none"> ▪ Hampstead Post Office ▪ Royal Mail Hampstead Delivery Office, Shepherd's Walk ▪ Barclays Bank <p>Pubs including</p> <ul style="list-style-type: none"> ▪ Magdala, The Garden Gate, The Roebuck, The Freemasons Arms, The Wells Tavern, King William IV, The Duke of Hamilton, The Old White Bear, The Holly Bush, and The Old Bull and Bush. <p>e) Places of worship</p> <ul style="list-style-type: none"> ▪ St Mary's, Hampstead

		<ul style="list-style-type: none"> ▪ St John's, Downshire Hill ▪ Christ Church, Hampstead ▪ Rosslyn Hill Unitarian Church (Hall on Local List) ▪ Heath Street Baptist Church ▪ Hampstead Meeting House ▪ The Village Shul <p>2. Development proposals will contribute to the support of these community facilities through Community Infrastructure Levy (CIL) and other agreements as appropriate.</p> <p>3. The Plan will resist the further loss of facilities for older and vulnerable people unless alternative provision can be provided locally, or firm evidence can be provided to demonstrate that the facilities are unviable or no longer required.</p> <p>4. The Plan supports proposals to facilitate cultural activities in the Plan area</p> <p>5. While recognising that the Council cannot compel the provision of postal or banking services, the Plan supports efforts to maintain convenient access to these essential services for residents. These may include:</p> <p>a) Encouraging the integration of postal and banking services within existing community facilities or new developments where feasible.</p> <p>b) Supporting community-led initiatives to provide alternative solutions for accessing postal and banking services.</p> <p>c) Promoting dialogue between the community, service providers, and the Council to explore innovative ways to maintain these services in the area.</p>
HC3	<p>We are not clear if the areas mentioned are where the Forum expects enhanced public realm to be provided or are intended as examples of good public realm. If it is the latter, the reference in this policy to South End Green seems to conflict with the shortcomings of this area identified earlier in the Plan, i.e. the Vision for South End Green. Subject to input from the</p>	<p>Redraft HC3 (1) to read:</p> <p>1. The Plan supports development that creates accessible, well lit, welcoming public spaces with good environmental qualities. Examples of such areas include South End Green, Oriel Place Garden and the northern end of Heath Street.</p>

	Forum, we consider the reference to South End Green may need to be removed	
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From: Andy Hobsbawm [REDACTED]
Sent: Monday, September 30, 2024 3:37 PM
To: safetravel <safetravel@camden.gov.uk>
Subject: ***Re: REMINDER: Consultation on an update to the Hampstead Neighbourhood Plan and application for redesignation of the Hampstead Neighbourhood Forum

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Dear Camden Council,

Here are our comments as residents of Swain's Lane:

We strongly object to several aspects of the proposed urban development plan. Our objections are based on the plan's potential negative impacts on our community's quality of life, environment, and character. We urge the planning committee to address the following concerns:

1. Insufficient Community Consultation

- We STRONGLY object to the inadequate community consultation process. The current process is overly complex and time-consuming, requiring residents to review **23 different documents** related to Highgate plans, **totalling 775 pages of information**. It also started during the holidays when people were away so didn't allow enough time.

2. Displaced Traffic Impact on Swain's Lane and Surrounding Areas

- We object to the absence of specific traffic mitigation strategies for Swain's Lane, as displaced traffic could increase congestion and pollution near residential areas.

3. Air Quality Impact

- We object to insufficient measures to monitor and mitigate air pollution. There are no specific air quality targets and steps to achieve them.

4. Risk of Overdevelopment and Loss of Character

- We're concerned about the potential overdevelopment of the area leading to the loss of its traditional character.

5. Parking and Accessibility Issues

- We're concerned about insufficient parking and accessibility for residents and visitors, especially if parking spaces are reduced without adequate alternatives.

6. Lack of Strong Protection for Local Green Spaces

- We're concerned by the lack of specific protections for smaller green spaces and lack of provisions to ensure that Swain's Lane benefits from enhanced protections for local greenery and biodiversity.

We urge the planning committee to carefully consider these objections.

Andy and Kate Hobsbawm



From: [Parish, Richard](#)
To: [PlanningPolicy](#)
Subject: Draft Revised Neighbourhood Plan and Redesignation of the Hampstead Neighbourhood Forum
Date: 27 August 2024 16:03:34

[EXTEAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Planning Policy Team

Draft Revised Neighbourhood Plan and Redesignation of the Hampstead Neighbourhood Forum

Thank you for consulting Historic England in respect of the revised neighbourhood plan and the redesignation of the Hampstead Neighbourhood Forum.

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 such, we have reviewed the revised Plan in respect of the potential for any significant impacts on proposals affecting the historic environment. The proposed draft plan continues to reflect the strong focus on preserving and enhancing heritage within the plan area as set out in the current neighbourhood plan. As such, we do not wish to comment in detail and consider that likely impacts of the plan on the historic environment to be positive. We are therefore content for the local authority to determine this application in the basis of its own specialist advice and wider consultation responses.

Finally, I must note that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this application, and which may have adverse effects on the historic environment.

Richard Parish
Historic Places Adviser
London and South East Team
Historic England

Tel. [REDACTED]



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Re: Consultation response to revised Hampstead Neighbourhood Plan and application for redesignation of the Hampstead Neighbourhood Forum
Date: 30 September 2024 12:27:25

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[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

I write in connection with the revised Hampstead Neighbourhood Forum Plan and redesignation application from the perspective of the section of Fleet Road and Byron Mews which are in Gospel Oak Ward but have been included in the HNF neighbourhood area.

Residents on Fleet Road were unaware they had been included in the map area until 2020 when the HNF Vision for South End Green was used by Camden Council to justify moving the 168 bus terminus to Fleet Road on a trial basis.

We thought that the question of moving a bus stand to Fleet Road had been settled when John Thane, Adam Harrison's predecessor, ruled it was not appropriate to accommodate a bus stand on this narrow, busy, residential road, which is already the most congested in the area (and access road for ambulances to the hospital) and that as there was no alternative location the 168 (now 1) bus should remain where it was on the slip road. However, completely unbeknownst to us all this was going on in the background with devastating consequences for us. Again now, we find ourselves in the parlous situation of having to fight off an even bigger bus terminus being thrust upon us, the 24-hour 24 bus stand which Camden has decided to move from the purpose-built terminus at the Green to Fleet Road so that the 1 bus can be moved from the slip road to the terminus instead.

The planned changes at South End Green are entirely in the interests of Hampstead Town to the detriment of Gospel Oak. Gospel Oak Ward, which occupies one side of the Green had no say in the HNF referendum which was decided by Hampstead Town Ward, the vast majority of whom neither live nor work here. Indeed, in 2018 both the Green and the slip road (as well as the bus terminus, Fleet Road, and Byron Mews) were all in Gospel Oak. In order to fulfil their vision, the slip road at the Green is to be pedestrianised which leaves the decades-long problem of where to put the bus stands for the now 1 bus. There has never been a solution to this in over 20 years so instead Camden are dumping the 24 bus terminus on Fleet Road to fulfil the HNF Vision. This is a permanent threat to our safety, health and wellbeing.

Hampstead Town is one of London's most affluent wards while Gospel Oak is one of Camden's most deprived. The events of the past few years, which have been going on in the background and about which we were totally unaware, underline how critical the role of the Cabinet Member for Planning and a Sustainable Camden is in adjudicating neighbourhood plans as otherwise a Labour-run council is presiding over greater division and greater deprivation.

Regards,

Pat Newby
(on behalf of Save Our Street)

RESPONSE FROM HAMPSTEAD NEIGHBOURHOOD FORUM

We respect the comments from Fleet Road residents but neither we nor the Plan are the appropriate target for their unhappiness.

The Vision for South End Green section, which does not carry policy weight, was included in the 2014 Neighbourhood Plan to reflect many years of pressure from the local community to improve the junction and open up the space. Because such changes have not yet been enacted, we have again included the section in the new Plan.

Notably, paragraph 6.61 calls on Camden to work with partner organisations and Transport for London to help realise the community's vision. We felt this was the limit of what the Forum and the Plan had a mandate to do. Neither we nor the Plan can have any say over the precise

arrangements for the scheme, such as the siting of bus stops, which are not planning matters.

Camden has consulted and the result is a [scheme which it approved](#) in August 2024. Work has not yet started. Hampstead Town Ward's councillors have allotted a considerable amount of Community Infrastructure Levy to the scheme. However, Fleet Road residents object to the siting of the number 1 bus terminal on Fleet Road.

It is not correct to say that residents were not consulted on being included in the Plan area. There was full consultation in 2014 and indeed that part of Gospel Oak ward was included because residents wished it to be.

We have proposed above an amendment to 6.57.

From: [Planning](#)
To: [PlanningPolicy](#)
Subject: Comments - draft revised Hampstead Neighbourhood Plan
Date: 20 August 2024 11:44:50

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Good Morning

Thank you for consulting Theatres Trust on the draft revised Hampstead Neighbourhood Plan. We have an interest in this plan because the area contains two theatres.

Remit:

Theatres Trust is the national advisory public body for theatres, established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015. This requires the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

Comment:

Policy HC2 manages community uses and resists the loss of specific facilities. This includes Pentameters Theatre (part b.) which is welcomed. We would however urge expansion of this list to also include the Well Walk Theatre which provides theatre for children. This will provide consistency and ensure all facilities within the area meeting different needs are adequately recognised and protected.

We hope these comments prove beneficial as the plan is refined.

Kind regards,

Tom Clarke MRTPI
National Planning Adviser

Theatres Trust

22 Charing Cross Road, London WC2H 0QL

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Trustees and is registered as a charity under number 274697.

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Save energy and paper.

Hampstead Neighbourhood Forum's response:

We will include the Well Walk Theatre in HC2. It was in the list but dropped out in production. We apologise for the error.



planningpolicy@camden.gov.uk

Transport for London
Spatial Planning

8th Floor
5 Endeavour Square
London E20 1JN

Phone [REDACTED]
tfl.gov.uk

8 October 2024

Consultation on revised Hampstead Neighbourhood Plan (Regulation 16)

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 this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).

Thank you for giving TfL the opportunity to comment on the revised Hampstead neighbourhood plan.

The London Plan was published in March 2021. Neighbourhood plan policies should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that neighbourhood plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

It is surprising that Transport for London was not included in the list of statutory consultees as part of the Regulation 14 consultation, noting that Network Rail and National Highways were both consulted.

We have concerns about some of the references to Transport Assessment requirements and the application of PTAL which do not reflect London Plan policy. We also want to emphasise the importance of retaining and improving

interchange facilities and bus standing capacity in any proposals for South End Green. Our detailed comments are set out in the table in appendix A, below.

We hope that these comments can be incorporated in the revised Hampstead neighbourhood plan.

Yours faithfully



Josephine Vos

London Plan and Planning Obligations Manager

Email: [REDACTED]

Appendix A: Detailed comments and suggestions for amendments to the revised Hampstead neighbourhood plan

Policy/Project/Paragraph	TfL response
Policy TT1 – Traffic volumes and vehicle size/ Paragraphs 6.20 – 6.28	<p>Part 1 only requires submission of Transport Assessments or Statements for ‘proposals that can reasonably be expected to result in a significant number of additional motor vehicle journeys post-completion.’ The London Plan requires Transport Assessments or Statements for all major development proposals so that the impacts on all forms of transport including public transport, walking and cycling can be considered and mitigation secured to address impacts. For consistency, the policy should make it clear that London Plan and Camden Local Plan requirements apply and then set out any additional requirements that are relevant to the neighbourhood area. As stated in paragraph 6.20 there is guidance available from TfL and Camden Council.</p> <p>Paragraph 6.21 should make it clear that pre application advice for major developments should also be sought from Transport for London. We recommend that the penultimate sentence is clarified as follows: ‘Applicants should discuss, and agree, the need for and content or scope of these documents with the local planning authority and (for major developments) Transport for London at the pre-application stage.’</p> <p>Paragraph 6.25 is potentially confusing because redevelopment could refer to a very large site that is redeveloped. As written, it does not allow for redevelopments that may have wider transport impacts beyond vehicle trips. For example, any impact on public transport, walking, cycling should be assessed. Additionally, paragraph 6.26 should refer to TfL guidance on Construction Logistics Plans.</p> <p>Paragraph 6.28 encourages the downgrading of the A502 to the north of Hampstead Village. Any proposals that affect the A502 should take into account that this is an important route for buses.</p> <p>Reference is made in this policy to Construction Management Plans (CMP) and Delivery and Servicing Management Plans (DSMP). However, the terms used in the London Plan and TfL guidance are Construction Logistics Plans (CLP) and Delivery and Servicing Plans (DSP). For consistency these references should be changed.</p>
Policy TT2 – Pedestrian environments	<p>We suggest additional bullet points should be added as follows ‘To support the Healthy Streets Approach’ and ‘Replace surplus or poorly located on-street car parking with an improved public realm, cycle parking or parklets’.</p> <p>Consideration could also be given to selective restrictions on vehicle access or ‘filtered permeability’ where appropriate.</p>
Policy TT3 – Public transport/ Paragraphs 6.42 – 6.44	<p>Paragraph 6.42 is inaccurate in stating that the Hampstead Town ward has a ‘relatively low; PTAL of 4 as this actually represents a place well-connected by public transport. It is also misleading to state that 70 per cent of the total population live in areas with a PTAL of 3 or less. As shown in figure 6.9 nearly half live in an area with a PTAL of 3, less than 20 per cent live in an area with a PTAL of 2 and less than 3 per cent in an area with a PTAL of 1a or 1b. Equally, Camden as a whole is a well-connected borough with excellent public transport and active travel options throughout, as reflected in Camden’s local plan policies which require development across the borough to be car free.</p>

Policy/Project/Paragraph	TfL response
	<p>Paragraph 6.43 is also inaccurate in ignoring the impact of Hampstead Underground and Hampstead Heath Overground stations in contributing to the PTAL. Both stations provide public transport connectivity to a wide range of locations, thus ensuring that the area is well served by strategic and local public transport.</p> <p>Paragraph 6.44 needs revision to reflect the fact that because Camden is a well-connected borough, car free development is required for the whole of Camden including Hampstead.</p> <p>We strongly recommend that paragraphs 6.42 – 6.44 are substantially redrafted to present a more accurate representation and interpretation of PTAL in the local area.</p> <p>Although we advocate the use of PTAL as a measure of public transport access, Policy TT3 is unduly restrictive in applying a threshold of PTAL 5 for major developments. As noted above, the whole of Camden is well-connected by public transport and can accommodate sustainable development at a range of scales.</p> <p>Part 2 should allow for active travel as well as public transport improvements. In considering the measures that are required, the test should be how best to improve connectivity of the site by all forms of sustainable transport rather than a rigid adherence to achieving PTAL 5.</p>
6.60 – 6.61 Vision for South End Green	<p>We note the desire to work with TfL and Camden Council to improve the public realm at South End Green and concerns about bus standing. The South End Green bus interchange is essential to support people accessing the Royal Free Hospital, Hampstead Heath and the local area as well as providing interchange with Hampstead Heath station. The suggestion in 6.60 that it is the cause of significant problems requires evidence to demonstrate this is the case, and as written fails to recognise its importance in providing access to the local area. It is essential that any changes to the area are designed to maintain existing interchange and bus standing facilities alongside an enhanced public realm. We are aware of current proposals for changes to South End Green from Camden Council, although we have a number of concerns which have been expressed in writing. We are not satisfied that the current proposals maintain current bus services and resilience. As a minimum, we require six formal stands in the area, all operationally effective, in order to maintain bus operations and to accommodate rail replacement services when required. We are open to continued discussions to attempt to refine the design proposals to achieve the objectives of both parties.</p>