

Appendix 8: Dartmouth Park Neighbourhood Plan Regulation 14 comments from LB Camden with DPNF comments

At this point in the plan's preparation we are making informal officer-level comments on the Neighbourhood Plan with particular regard to the effectiveness and clarity of the plan and its compliance with the basic conditions for neighbourhood plans. This includes input from relevant council departments. We hope the Forum will find these comments helpful in taking the Neighbourhood Plan forward. Officers would be happy to answer any questions you have regarding our suggestions.

Policy	Comments	DPNF response to comments
General	<p>The Council commented previously that a number of the Plan's policies were not clear and unambiguous and therefore could not ensure a high degree of predictability contrary to para 17 of the NPPF and National Planning Practice Guidance (Paragraph: 041 Reference ID: 41-041-20140306).</p> <p>We note that some policies have been made clearer. There are still however instances where amendments or a review of particular policies are required to meet the basic conditions for neighbourhood plans and therefore pass examination.</p> <p>We have made suggestions for alternative wording where minor amendments would help ensure clarity.</p>	Noted
General	<p>Please use paragraph numbers in the Plan. Not only will it help others to easily comment on your plan, it will also greatly aid its application in assessing planning applications in the neighbourhood area and the independent examiner considering the plan.</p> <p>Policy text should be clearly identifiable. We suggest you use text boxes or something similar to differentiate the policy from supporting text / background information.</p>	<p>Unfortunately, we were unable to add paragraph numbers.</p> <p>Text boxes to be added.</p>
Page 7 Paragraph starting 'Chapter 9'	Last sentence - " <i>The Chapter sets out a process for involving the community in the development choices at an early stage, together with a set of principles to be applied in judging any such</i>	Revised to: 'The Chapter sets out a process for involving the community in the development choices at an early stage, together with the community's aspirations for a set of principles

	<p><i>development.”</i></p> <p>This is misleading as the chapter sets out community aspirations rather than ‘principles to be applied’ when assessing a planning application. The wording should be amended to make clear that Chapter 9 sets out the community’s aspirations (but these are not policy requirements).</p>	<p>to be applied in judging any such development.’</p>
<p>DC1</p>	<p>Criterion a)</p> <p>We welcome additional information on focal points and maps for the views noted in policy DC1. The focal points should however be located on public footpaths as this where the view will be observed (not in the middle of the highway). Where a focal point is moved to the footpath, an updated photograph taken from that location will need to be used.</p> <p>To aid application of the policy the Appendix should provide more information on what would be considered to harm the particular view and where there is scope for change within the view without harming its value to the community. It should also be remembered that neighbourhood plan policies are only able to influence development within the neighbourhood area boundary.</p> <p>The policy and supporting text say development should not tightly define the edges of a view. However, the Plan should be mindful of opportunities for development to positively frame a view.</p> <p>Criterion b)</p> <p>i) “or replace” could be misinterpreted e.g. it could be read that it is considered acceptable to build on an open space and replace it elsewhere. The supporting text refers to maintaining green and open spaces only (not replacing).</p> <p>Supporting text on DC1(b) page 20 refers to Map 2 in the Local</p>	<p>Text in Appendix 3 amended to make it clear that although each view is shown by a photograph taken from a specific point (which is marked by a spot on the photo location map), in almost all cases the view can be seen and appreciated from a wider perspective in the vicinity of the photo location, as the viewer walks, drives or cycles down or through the viewing corridor. While the photographs provide a general representation of the view, the key features that underlie the value of the view and that are to be maintained and protected by any development are identified in the accompanying text, which has been amended to explain in greater detail what aspects of the view should be maintained.</p> <p>Noted. Reference is made to framing views in appropriate places in Appendix 3.</p> <p>‘or replace’ deleted.</p> <p>Amended to ‘locations deficient in access to open space’.</p>

	<p>Plan shows areas deficient 'natural greenspace'. This should be amended - as Map 2 shows deficiency in access to open space.</p> <p>Criterion c)</p> <p>The term “broadly similar” is too vague. Suggest you instead replace this with something like “which respects that of surrounding buildings” (also in policy H1 criterion a iii).</p> <p>To avoid ambiguity the Plan should use consistent terminology/language. Supporting text to DC1c on page 20 refers to 'high rise' and 'large scale development' - as drafted, we assume these are intended to cover the same things. If this is the case, for clarity we suggest using just one of the terms.</p> <p>The supporting text to DC1c refers to “traditional urban forms” - it would be better to refer to the urban form that characterises Dartmouth Park Neighbourhood Area, rather than using a more generic term.</p>	<p>Amended to 'scale and massing which respects that of surrounding buildings'.</p> <p>Amended to 'high rise development'.</p> <p>Amended to 'urban forms characteristic of Dartmouth Park (terraces, semi-detached and detached houses of three or four storeys and medium rise estates)'.</p>
Page 16	Figure 3a. The neighbourhood plan boundary is not clear in some parts of the Map. The Plan should be clear that its policies can only relate to land inside the neighbourhood plan boundary.	Plan to be clarified.
DC2	<p>Criterion c) (ii) The tests in national policy for assessing the impact of a development on designated heritage assets are greater than for non-designated heritage assets (e.g. locally listed buildings). For locally listed buildings para 135 of the NPPF applies a more balanced approach to assessing impact: <i>“In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”</i> Policy c(ii) needs to reflect this to be consistent with national policy. The forum could change c) ii) into a separate criterion acknowledging the lesser test in accordance with National Planning Policy, i.e. <i>"d) in the case of development affecting any of the locally-listed and other heritage assets identified in Appendix 4, or the settings</i></p>	Noted but not amended. The intention of this policy is to treat all 'positive contributors' and locally listed buildings in the same way. It didn't matter in that context whether a building included in our list of significant buildings was a positive contributor or locally listed. By splitting the two into different policies with different standards, most of the buildings in our Appendix would be removed and the desire to emphasize the special character of these buildings would be lost.

	<p><i>of them, only permitting development that is designed to a high standard."</i></p> <p>Supporting text Page 21. <i>"The protection of conservation area status should apply not only to the Listed Buildings, but also to the many fine unlisted properties in the Conservation Area and their settings."</i> This statement is somewhat confused and should either be deleted or amended as Conservation Areas are designated heritage assets and this protection is outlined in the NPPF.</p> <p>The supporting text (last paragraph, page 22) needs to be amended to recognise that a balanced judgement will be required in determining the 'scale of any harm' of non-designated heritage assets as per comment and suggested wording above.</p> <p>Supporting text DC2 d) <i>"Where a development will have an impact on such features, therefore, we will expect those elements to be preserved, repaired and reinstated as required."</i> This should reflect the amendment in the policy text, so suggest 'encourage' rather than 'expect' and 'as appropriate' rather than 'as required'.</p>	<p>Sentence deleted.</p> <p>Sentence added regarding requirement for balanced judgement.</p> <p>Amended to 'Where a development will have an impact on such features, therefore, we encourage the preservation, repair and reinstatement of those elements as appropriate.'</p>
<p>Supporting text on DC2 (c) page 22</p>	<p>We note the Forum's aspiration for 'additional buildings and assets' identified in Appendix 4 to be included in Camden's Local List. Most of these are already identified in the Conservation Area Appraisal as positive contributors and therefore Council did not include them on the Local List as they are already considered designated heritage assets. The local list is for 'non-designated heritage assets'. Planning policy gives greater protection to positive contributors in conservation areas than buildings on the local list.</p>	<p>Noted but not amended. It is the CA, not the positive contributors, that is the designated heritage asset, so it is not clear that positive contributors have greater protection than locally listed buildings. The intention of the policy is to treat all non-designated heritage assets in the same way, whether or not they are positive contributors or on the local list.</p>
<p>DC3</p>	<p>Criterion d) <i>"avoiding juxtaposition of buildings of significantly different scale and massing and incorporating a gradual transition from the scale of the surrounding built context"</i>. There</p>	<p>Amended as suggested.</p>

	<p>is a need for greater flexibility here as there may be cases where this is not appropriate or possible in design terms. Suggest insertion of “<i>where appropriate</i>” in the policy and supporting text.</p> <p>Criterion g) - we agree that developments should provide amenity, refuse, and bicycle and mobility space. However, the Plan does not specify what is “adequate” and is therefore open to interpretation – in the supporting text the Forum should state what the standard is. If the standards are greater than those in the Local Plan or London Plan, robust local evidence will be needed to support the different approach.</p> <p>Criterion h) “<i>solid external security shutters should be resisted</i>” this criterion would read better if you replace ‘should be’ with ‘will be’.</p> <p>Supporting text second paragraph page 25. Please note that the plan cannot ‘permit’ development to take place. Suggest replace “permit” with “support”.</p>	<p>Supporting text amended to clarify that we are not trying in this policy to set a new standard for the quantum of facilities to include. The policy is intended to ensure that even where Camden policies and the other policies in the Plan are met in terms of the quantum of facilities, sufficient space is allocated to these functions to ensure a high quality and well managed streetscape.</p> <p>Amended as suggested.</p> <p>Amended as suggested.</p>
DC4	<p>The title ‘Small residential developments’ implies that the policy is about the creation of new dwellings and/or conversions rather than extensions to a home, which is what it appears to cover. Suggest the name is reconsidered to better reflect the content of the policy.</p> <p>Criterion d) - the wording “<i>proportionate to that of neighbouring properties</i>” could be clearer and could potentially have a negative impact if neighbouring gardens have significantly less garden space. Paragraph 7.20 in Camden’s Local Plan states development will be resisted where it occupies an excessive part of the garden and “<i>where there is a loss of garden space which contributes to the character of the townscape</i>”.</p> <p>For clarity it is best to use consistent terminology / language. The first policy statement in DC4 and Criterion f use different terms to describe extensions to a roof. We suggest you replace ‘loft development’ with ‘roof extension’ and replicate this change in</p>	<p>Title amended to ‘Small residential extensions’.</p> <p>Amended to ‘in the case of rear extensions, does not occupy an excessive part of the garden or result in the loss of garden space which contributes to the character of the local area;’.</p> <p>Amended as suggested.</p>

	your supporting text.	
H1	<p>Criteria a) (ii) & (iii) and b) - These criteria are design focused and repeat other policies within the Plan. Therefore they are best removed.</p> <p>Criterion c) and associated supporting text. Further clarity is needed regarding the use of the term 'starter homes'. A 'starter home' in London is a new home costing up to £450,000 to be available at a 20% discount on market value. The draft revisions of the NPPF defines "starter home" as households with a maximum household incomes of "£80,000 a year or less (or £90,000 a year or less in Greater London)". We assume that, rather than this, you are referring to smaller homes that suitable for young people forming a household of their own for the first time. This needs to be clarified to avoid confusion. We would suggest that you do not use the term 'starter homes' unless you are referring to homes meeting the government definition. Please note that the Council does not support 'starter homes' in terms of the government definition because:</p> <ul style="list-style-type: none"> • they will only be affordable to those with household incomes close to the £90,000 cap; • they will require so much subsidy that they squeeze out all other forms of affordable housing; and • they will return to full market price within 8 years of initial purchase. 	<p>These criteria are included as part of a compromise seeking to balance conservation and social objectives. The supporting text has been amended to make clear that while the policies reflected in H1(a)(i) and (ii) are also addressed in Chapter 3 (Design), they are included here to capture the overall balance sought between the 'social' and 'built' character of the Area.</p> <p>Replaced 'starter homes' with 'first homes for younger people'.</p>
H2	<p>Criterion a) the term 'multi-unit' is not always best to describe development containing more than one dwelling. In this instance the term multi-unit makes the policy inconsistent with the Council's policy on affordable housing. Camden Local Plan policy H4 'Maximising the supply of affordable housing' expects affordable housing from all developments that provide <u>one or</u></p>	<p>Amended as suggested.</p>

	<p><u>more additional homes or 100sqm. This criterion should therefore be altered to “requiring all proposals of one or more additional homes to maximise the inclusion of affordable housing...” to ensure consistency with the Local Plan.“</u></p> <p>Criterion b) i) The criterion or supporting text should provide some flexibility, as per paragraph 3.134 of the Local Plan, to consider the quantum of affordable housing across different parts of the Council’s Community Investment Programme (CIP). This programme involves refurbishment and sometimes redevelopment of the Council’s estates.</p> <p>Criterion d) <i>“ensuring that affordable homes are well integrated with, are designed to the same standard as and are visually indistinguishable from the market housing in the development”</i>. The intention of this criterion is not very clear and may not be consistent with Council policy. For example, is this purely a visual consideration on the external envelope of a building? or is it also concerned with the internal layout and services? If it includes the later it could have a negative impact on maximising affordable housing due to additional service charges. Our Interim Housing Camden Planning Guidance (para IH2.71) explains that <i>"In schemes with internal communal spaces, the Council does not generally seek to mix affordable and market dwellings on the same corridors or sharing the same stairs, lifts and entrance lobbies. This is because occupiers have to pay a service charge and/ or management charge for the cleaning and maintenance of communal spaces. Service charges are often a significant proportion of overall housing costs, particularly in market housing blocks, and can simply be too high for the occupiers of affordable housing to pay. The law ensures that an occupier cannot be required to pay higher service charges to subsidise charges to another occupier receiving the same common services, regardless of tenure. To ensure that service charges are kept to a minimum, the communal parts of affordable housing are generally designed for durability and low</i></p>	<p>Amended by adding ‘unless, in the case of strategic local or short term relocation of affordable housing, a strategy is in place for its eventual replacement’.</p> <p>Amended by deleting ‘are designed to the same standard as’. The focus of the policy is on visual consideration of the external envelope rather than on internal layout and services.</p>
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	<p><i>maintenance costs."</i> We therefore suggest you revisit this criterion and make any necessary amendments.</p> <p>Supporting text Page 35. Please note the definition of affordable homes will be updated in the revised NPPF which is expected to be published next month, superseding the definitions mentioned in the Plan.</p> <p>Page 35. Reference to "Mayor's draft Affordable Housing Supplementary Guidance". The final version of this was published in August 2017 - as "Homes for Londoners: Affordable housing and viability" Supplementary Planning Guidance.</p> <p><i>Where it is not possible to locate affordable housing on the same site as the market housing, it should still be located within the Neighbourhood Area... Where Camden accepts a payment in lieu of provision of affordable housing, we would similarly expect such payment to be applied to the development of housing within the Area."</i> The supporting text should recognise that it may not always be possible to deliver affordable housing within the neighbourhood area. If this is the only possibility available and no suitable sites are found s106 contributions would have to be repaid. To avoid the potential for Camden to lose the opportunity to provide affordable housing or payments towards affordable housing we suggest the plan states that provision should be explored in the neighbourhood area 'in the first instance'.</p>	<p>Amended by changing reference to the definition in Annex 2 to the 2018 NPPF.</p> <p>Amended to refer to 'the Mayor's Affordable Housing Supplementary Planning Guidance, 'Homes for Londoners: Affordable housing and viability' (August 2017)'. Amended supplementary text to clarify that if affordable housing cannot be located on the same site, it should be located within the Neighbourhood Area where sites are available. Also clarified that if that is not possible and Camden accepts a payment in lieu of provision of affordable housing in accordance with its policies, we would expect such payment to be applied to the development of housing within the Area or as close as possible to the Area. This is intended to preserve Camden's ability to apply payments to affordable housing in these circumstances.</p>
CM1	<p>Criterion a) "<i>unless it has been demonstrated over a period of not less than 12 months</i>". We suggest this is amended for clarity "<i>unless it is demonstrated by a marketing exercise undertaken over a period of not less than 12 months</i>". (Similar comment for policy CE2).</p> <p>Camden's Local Plan policy C3 'Cultural and leisure uses' includes other considerations for assessing applications that include the loss of cultural and leisure uses – we suggest you refer to these additional criteria in your policy or supporting text</p>	<p>Amended as suggested.</p> <p>Supporting text amended to refer to Camden Local Plan Policy C2 (Community facilities) or C3 (Cultural and leisure facilities).</p>

	<p>to ensure that the neighbourhood plan is consistent with the Local Plan.</p> <p>Supporting text CM1a) “The policy therefore starts from a very strong presumption that all such available facilities should be retained,” this should include “unless they are replaced or it is demonstrated that they are no longer required or viable” (as per the policy).</p> <p>Criterion c) and associated supporting text should be moved into Chapter 9 as they are relate to site aspirations rather than policy.</p>	<p>Amended as suggested.</p> <p>Amended as suggested.</p>
Page 43 General	<p>Under the Vision for Neighbourhood Centres and Employment.</p> <p>Considering the Forum's desire to maintain workspaces in the area, the second bullet could refer to “sustainable development that provides new jobs <u>and workspaces for small and medium enterprises</u>”</p>	Amended as suggested.
Page 44 General	<p>Paragraph 3. Welcome support for protecting workspaces. This could be linked to Local Plan policy E1 ‘Economic development’.</p>	Amendment here not appropriate, as this section is recording comments received in consultations.
Page 45 Neighbourhood centre profiles	<p>Figure 6a is not consistent with the designations of neighbourhood centres in the Local Plan. Also, the outline of the centres extends beyond the neighbourhood area boundary (see Camden's Policies Map) and Camden's Local Plan Map 7. The Plan's policies can only apply within the neighbourhood area.</p> <p>The map should either be removed or replaced with a map showing accurate representation of the neighbourhood centres in the Dartmouth Park Neighbourhood Area.</p> <p>Table page 45 - the neighbourhood centre is named “Chester Road” not “Chester Balmore”.</p> <p>The reference to the "Council's 'Neighbourhood Centres' policy"</p>	<p>Map to be amended to be consistent with Camden's Policies Map.</p> <p>Throughout Plan, amended to Chester Road when referring to the commercial centre, but retained Chester Balmore when referring to the development, as that is the term in general use in the neighbourhood.</p> <p>Amended to change reference to Camden's Policies Map. A</p>

	at the bottom of page 45 is incorrect as CPG5 is supplementary <i>guidance</i> not policy. Suggest changing last sentence to “ <i>It is consistent with the Local Plan policy TC1 ‘Quantity and location of retail development’ and TC2 ‘Camden’s centres and other shopping areas’.</i> ”	reference to Camden’s Policies TC1 and TC2 is not appropriate here, as they do not define the neighbourhood centres.
Page 50	<p>“...there is an Article 4 Direction preventing change of use.”</p> <p>Article 4 Directions do not in themselves prevent changes of use or applications for planning permission. The Direction on the Dartmouth Arms removes permitted development rights which allow changes of use without planning permission. Therefore a planning application is required for any proposed change of use and this will be considered against the Council's policy that seeks to protect viable pubs.</p> <p>Therefore suggest the first sentence on page 50 is changed to “<i>The pub has been designated as an Asset of Community Value and there is an Article 4 Direction removing the ability to change its use without planning permission.</i>”</p>	Amended as suggested.
CE1	<p>Criterion a) and b) to avoid ambiguity replace “...across a Neighbourhood Centre...” with “...within the Neighbourhood Centre as a whole...”</p> <p>Criterion d) “ensuring that any development encourages independent businesses or enables new independent businesses to establish themselves” the supporting text should be used to explain how a developer is expected to do this/ address this issue.</p> <p>Supporting text - welcome support of the Article 4 Directions made by the Council. (Please be mindful that the Article 4 Directions are for defined areas; they are not borough-wide.)</p>	<p>Amended as suggested.</p> <p>Supporting text amended to refer to developers including flexible spaces with a variety of sizes and rental values, including live/work units for local people working in creative and other areas, and working with local people through a Retail Forum</p> <p>Noted..</p>
CE4	There is mention earlier in this chapter on the affordability of workspaces. This policy could make reference to the provision of affordable workspace and add reference to the Council’s Camden Planning Guidance on Employment sites and business premises.	Amended to add new Policy CE4(b) ‘supporting the provision of affordable workspaces’.

Fig 7A	The map is somewhat misleading as to the extent of some open spaces shown as it is not clear that some contain buildings (e.g. Brookfield Estate gardens). Suggest you either revisit the mapping style or add a reference to this under the map and where relevant in Appendix 6.	Map to be amended to remove from areas shown as green space the parts of the area covered by buildings.
Appendix 6 (connected to ES1)	<p>While land put forward for Local Green Space designation does not need to be in public ownership, a Neighbourhood Forum should contact landowners at an early stage so that they have the opportunity to make representations. There is no need to state this in the Appendix – but this step should be followed for all land proposed for LGS that is in private ownership (Mansfield Bowling Club, Mortimer Terrace Nature Reserve....).</p> <p>Paragraph 77 of the NPPF specifies criteria for Local Green Space (LGS) designation and further information is provided in National Planning Practice Guidance (NPPG). NPPG states that LGS designation will rarely be appropriate <i>“where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.”</i></p> <p>Mansfield Bowling Club has an extant permission (granted at appeal, reference 2015/1444/P). While Appendix 6 recognises the permission and highlights the importance of the space for recreational use there is a need to specify how the LGS designation will relate to the extant permission. The map should also reflect the LGS proposed in accordance with the approved plans.</p> <p>Highgate Enclosures. It is worth noting in the Appendix that Grove Terrace is Listed Grade II*.</p> <p>Highgate New Town green spaces - Three point park “Raydon Road and Balmore Street” - assume you mean Raydon <u>Street</u> and Balmore Street?</p>	<p>Noted. Landowners for Mansfield Bowling Club, Mortimer Terrace Nature Reserve and York Rise Estate to be consulted prior to submission of Plan. All other proposed Local Green Spaces are owned by Camden Council.</p> <p>The map to be amended to show the part of the Mansfield site designated in the appeal decision to be retained as open space.</p> <p>Amended as suggested.</p> <p>Yes, amended to ‘Raydon Street’.</p>

	<p>97 – 113 Highgate Road landscaping While the landscaping here is considered of value to the local community we have reservations of whether this meets the criteria for LGS designation (paragraph 77 NPPF).</p> <p>B - Additional open spaces of value Gardens and tennis court, Lissenden Gardens. The last sentence “would benefit from the additional protection of status as a Local Green Space”. If it is being proposed for LGS designation it should be moved to Part A of the appendix. If not, the reference to LGS could cause confusion as to its status and should be removed.</p>	<p>Noted. Removed site from list of proposed Local Green Spaces.</p> <p>Amended to remove reference to LGS designation.</p>
<p>ES1 Criterion b)</p>	<p>National planning policy provides the mechanism (through Local Green Space designation) to identify green areas of particular importance for special protection. Other open spaces that do not meet the criteria for Local Green Space in paragraph 77 of the NPPF cannot be afforded the same level of protection.</p> <p>To ensure consistency with national policy suggest the following wording (or similar) - b) “<i>development should seek to protect the open spaces of value identified Fig 7A and described in Part B Appendix 6 where possible</i>”. The supporting text (particularly the last sentence paragraph 2) should also be altered to provide a degree of flexibility. The Council’s Local Plan does this by assessing the degree of impact and whether there is the potential for enhancement (see Local Plan paragraphs 6.33 and 6.37).</p>	<p>Policy ES1(b) amended as suggested. Supporting text amended to add: ‘In assessing any proposals for development affecting these spaces, consideration should be given to whether the development provides equivalent or better provision in terms of the quality and quantity of usable open space and whether it secures improvements to the accessibility and range of uses of the space.’</p>
<p>ES2</p>	<p>Criterion a)</p> <ul style="list-style-type: none"> The term ‘specimen’ has little meaning in this context and by referring solely to veteran and mature trees it suggests that semi- mature trees with future potential, avenues and groups of trees are of less value than those referred to. The term ‘significant’ would cover all bases. 	<p>Amended as suggested.</p>

- “If loss of any such tree....original site” this seems to limit loss to only these particular circumstances which is very onerous and restrictive. We would seek to retain higher quality trees, and certainly TPO trees, unless there are very exceptional circumstances but some flexibility is needed for less significant trees. Tree categories (A,B,C etc.) would influence what needs to be retained, as set out in British Standard BS5837. Where trees are lost, there are opportunities to secure new planting suitable for the site.
- We suggest the following wording for Criteria a) “retains significant trees which have amenity, ecological, historical or cultural value and provide for their protection during development in line with BS5837:2012 “Trees in relation to design, demolition and construction”. Where a tree is dead or dangerous and require removal, appropriate replacement trees are to be planted as close as is practicable to the location of the tree that has been removed.”

Criterion b) “equivalent numbers” is too inflexible. The priority for the Council is to secure greater species diversity and trees that have a prospect of living for a long time. We suggest the policy refers to securing an appropriate level of replacement planting, taking account of the time it takes for a tree to reach maturity. This would allow for flexibility and recognise that the number of trees will not always be a decisive factor when assessing a landscape proposal. We suggest the following wording for Criteria b) “where trees are proposed for removal in cases not covered by policy ES2(a), makes provision for a comprehensive landscaping scheme that includes new trees to mitigate the loss of visual amenity and canopy cover provided by those tree that are proposed to be removed, which are planted close to the location of removed trees where possible.”

Noted.

Policy ES1(a) amended to read as follows: ‘retains significant trees which have townscape, ecological, amenity, or cultural value and provides for their care and maintenance during development works in line with BS5837:2012. If a tree is dead or dangerous and requires removal, appropriate replacement trees capable of providing at least equal townscape, amenity, ecological, or cultural value are to be planted as close as practicable to the location of the tree that has been removed;’. This also takes into account comments received from TfL

Amended as suggested, with minor drafting changes.

	<p>Supporting text Page 67 “requirement for anyone proposing to carry out work to a tree with a trunk diameter greater than 7.5cm” please replace with 75mm.</p> <p>Reference to edible species is one of many factors relevant to choosing suitable trees. The Council’s approach is the ‘right tree for the right site’ as noted in paragraph 6.82 of the Local Plan, together with a number of considerations.</p>	<p>Amended as suggested.</p> <p>Supporting text amended to read as follows: ‘In selecting trees for a location, a ‘right tree for the right site’ approach will be taken, in line with Camden Local Plan paragraph 6.82. Within that context, large canopy species will be considered where space allows, in order to provide maximum shade cover. In more constrained locations, consideration will be given to edible species, which will contribute to healthy living and food security, as well as the biodiversity of the fauna in the Area.’ Also takes account of TfL comments.</p>
ES3	<p>Criterion c) should be (and is in part) part of Policy ES1. Delete here and add necessary text to ES1.</p>	<p>Amended as suggested.</p>
ES4	<p>Criterion a) - Please note that the plan cannot ‘permit’ development to take place. Suggest replace “permit” with “support”.</p> <p>Criterion b) The forum does not state what recognised best practice is. We suggest the following wording for criterion b) “where proposals involve substantial demolition, encouraging the embodied-carbon and whole-life effects, to be assessed using methods consistent with the Council’s planning guidance, in order to demonstrate that rebuilding will deliver greater carbon savings than refurbishment.”</p> <p>It is not clear whether policy ES4b only relates to buildings in the neighbourhood area that make a positive contribution to the conservation area (as per the supporting text)?</p>	<p>Amended to ‘allowing for’.</p> <p>Amended to read: ‘ensuring that all proposals involving substantial demolition demonstrate that rebuilding will deliver greater carbon savings than refurbishment, taking into account the embodied-carbon and whole-life effects of the proposed development.’ Intended to clarify that embodied carbon and whole-life effects are to be taken into account in the determination. Also amended to delete reference to ‘encourage’. Supplementary text amended to remove any suggestion that Camden policies do not encourage retention of buildings, and to clarify that in justifying demolition the developer must comply with any London or Camden policies on these issues and if there are none then with recognized best industry practice at the time.</p> <p>Supplementary text amended to clarify that the policy applies to all buildings, not just those that make a positive contribution to the conservation area.</p>

	<p>Page 71 first paragraph. We are unclear how ES4b goes further than existing policy in the Local Plan if it is limited to positive contributors in the conservation area. Camden Local Plan policy CC1 'Climate change mitigation' states the Council will "e) require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and f. expect all developments to optimise resource efficiency." The policy intention is the same in the Local Plan but relates to all proposals and not just positive contributors.</p> <p>Supporting text page 71. First paragraph references policy ES3b, is this meant to refer to ES4b?</p>	<p>See above.</p> <p>Yes. Amended as suggested.</p>
TS1	<p>Criterion a) - it is not clear what is expected, therefore should be reworded to provide greater clarity.</p> <p>Criterion b) as noted previously, applications for dropped kerbs or crossovers are made under the Highways Act and do not fall under the scope of planning policy. The criterion should therefore be removed. Camden's Local Plan policy T2 raises awareness that applications for the development of land connected to crossovers – hardstanding for example, will be resisted. The forum can support Camden's Local Plan policy T2 'Parking and car free development' criterion d.</p> <p>Criterion c) ii) please note that home zones and traffic calming measures do not fall under the scope of planning. This criterion should therefore be removed.</p>	<p>Amended to clarify that footways and cycleways should be continuous across entrances and exits.</p> <p>Noted, but policy retained. Supplementary text amended to make it clear it applies only in those situations where the developer is responsible for the kerbs or footways.</p> <p>Reference to 'home zones' deleted, but references to 'healthy streets' retained in line with comments from TfL.</p>
TS3	<p>Camden Local Plan policy T2 only allows for the provision of parking where it is designated for disabled people where necessary or where it is essential for operational or service needs. The wording of TS3 Criterion a) is not as clear and could weaken the Council's policy. It should therefore be amended or removed.</p> <p>As noted above the Council's policy on parking only allows for</p>	<p>Amended to 'car parking to be limited to that designated for disabled people where necessary or where essential (and not merely convenient) for operational or service needs of the development', to make clear the intention to be consistent with Camden's car-free policy.</p> <p>Retained. Policy only applies where car parking spaces are</p>

	<p>disabled parking (where necessary) or where it is essential for operational or service needs. Criterion c of TS3 assumes that parking is accepted and as such would be contrary to Local Plan policy T2. Suggest removal of this criterion.</p>	<p>allowed under other Camden policies and policies in this Plan. Supporting text amended to clarify this restriction.</p>
SNS1	<p>Page 82 third paragraph. <i>“The first is procedural: when any of these Sites comes up for development, local residents and businesses should be closely involved at an early stage in the development of the proposals.”</i> While this the preferred approach, developers are not required to closely involve the forum. We therefore suggest rewording to refer to involvement of local residents and businesses being <i>“strongly encouraged”</i> to reflect SNS1.</p> <p>Page 83 last paragraph. <i>“The purpose here is to set out a mechanism for how the community can stay involved when such larger planning applications are prepared.”</i> Similar to the comment above, we suggest you alter this to say <i>“...set out how the community wants to be involved when...”</i> as planning policy cannot require this.</p> <p>The wording <i>“applicants are expected”</i> in SNS1 is misleading as these measures cannot be a requirement of planning permission. It should be replaced with <i>“applicants are encouraged”</i> or similar. (The examiner of the Hampstead Neighbourhood Plan found that that plan should <i>“be amended to make clear that consultation with neighbours will be generally encouraged rather than ‘required’”</i>.)</p> <p>Page 84. <i>“For purposes of this policy SNS1, Specific Neighbourhood Sites will include any additional residential development of 10 homes or more or of a site of 0.5 hectares or more or any non-residential development of 1000 square metres of floorspace or more or of a site of 1 hectare or more”</i>. This statement is confusing and contradicts the defined list of specific neighbourhood sites on previous pages. We therefore suggest the policy wording is amended to state that the policy applies to <i>“...Specific Neighbourhood Sites and any additional residential</i></p>	<p>Amended as suggested.</p> <p>Amended as suggested.</p> <p>Amended as suggested.</p> <p>This wording moved to the definition of SNS in the Introduction to the Chapter, so a SNS is one of the listed properties or any property meeting this test.</p>

	<i>development of 10 homes or more etc. ...".</i>	
Chapter 9	<p>Please note it is not considered good practice to be critical of a development approved by the Council, and considered acceptable against planning policy. This has been noted in Examiner reports on other neighbourhood plans.</p> <p>9.4.1 Murphy's Yard</p> <ul style="list-style-type: none"> • Under 'Building heights', it is not clear how a building height of 5 storeys has been tested and chosen. There are likely to be topographical changes across the site that may impact this. Also confining the peripheral corridor to the same restriction as the viewing corridor is considered overly conservative. • It is not clear why employment space is limited to 30,000sqm and homes at 500? While these are site aspirations and not allocations we would suggest that 125dph is not viable and does not meet GLA good growth by design policies. 	<p>Noted.</p> <p>See AECOM report "Murphy's Yard Masterplan Framework", December 2016, which reviews site constraints and opportunities, including viewing corridors, to provide a strong evidence base on site capacity. We believe that the approach to the peripheral corridor is as set out in the policy in the Kentish Town Neighbourhood Plan.</p> <p>The approach to employment is one of no net loss of employment floorspace, as is consistent with the London Plan policy approach.</p> <p>Our assumptions are towards the top end of the London Plan density matrix (urban, PTAL 2-4) and we are very comfortable that everything we say is fully compliant with Camden Local Plan policy D1 ("respects local context and character" onwards). We note that it's great that the new NPPF gives greater emphasis on communities using neighbourhood planning to define the special character of their areas to influence design as a way of planning positively for growth, which is exactly what we are doing here.</p>
Chapter 10	The Council is listed as having a monitoring role but does not specify exactly what is expected. Please note that the Council do not monitor the policies in neighbourhood plans.	References to Council removed.