

Camden Council comments on Dartmouth Park Neighbourhood Plan, Submission Draft

The comments below are intended to form Camden Council's representation on the submission draft of the Dartmouth Park Neighbourhood Plan and include input from all relevant Council services.

The Council's representation seeks to address the Neighbourhood Plan's general conformity with the strategic policies in the adopted Camden Local Plan and its consistency with national policy.

The Plan was submitted to Camden on the 23 January 2019. Under the transitional arrangements for the introduction of the new NPPF, para 214 states that "the policies in the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before 24 January 2019". Therefore the comments below take account of the NPPF 2012, in particular paragraph 17 of the National Planning Policy Framework (NPPF) which states "*...local and neighbourhood plans...should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*".¹

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

| Policy | Comments | Reason |
|------------------------------------|--|---|
| General | Recommend the use of paragraph numbers in the Plan. | For clarity and ease of reference / use (e.g. in comments on planning applications, officer reports, and in planning appeals) |
| Para 1.2.1 2 nd para | Amend para as below: 'Neighbourhood Plans are mainly intended to be used in making planning decisions. When development or change is proposed in <u>the designated Dartmouth Park neighbourhood area</u> , Camden Council will have to refer to the Neighbourhood Plan. | To ensure the Plan is clear and unambiguous as to where it applies. |
| Figure 2 A | Although Figure 2A is titled Spatial Policies, it also includes projects, which will cause confusion regarding their status. | To ensure the Plan is clear and unambiguous, as |

¹ Similarly, the NPPF 2019 states in para 16 d) that :"*[Plans should:] d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.*"

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| | For clarity and to avoid confusion and uncertainty the projects should be removed from Figure 2A. | the Projects do not form part of the Neighbourhood Plan policies but are recommendations. |
| Page 7 Last para | Amend para as below 'Although not in itself part of the Plan for the purposes of determining planning applications, Appendix 5 sets out a number of ideas and proposals (referred to as projects) which are not in themselves planning policies but which could contribute to the achievement of the Plans objectives' | To ensure the Plan is clear and unambiguous. |
| Figure 3A | The boundaries of the 'Significant private / council open space' and 'Public park or garden' areas on this map should be amended to reflect the comments raised below regarding these designations to ensure consistency across the plan. | For consistency and to ensure the Plan is clear and unambiguous |
| DC1 (b) (i) Page 21, 2nd para | Recommend that the criterion DC1 (b) (i) be amended to say: 'i) maintain existing <u>designated</u> green or open spaces' Recommend that on second para on page 21 also be amended for consistency to say development should: "maintain <u>designated</u> existing green or open spaces" and clarify that this relates to spaces identified in the Neighbourhood Plan and on the Camden Policies Map. | To ensure the Plan is clear and unambiguous. |
| Page 21 | Para 21 says " <i>As discussed above, despite the Area's green and leafy feel, there is comparatively little space actually open to the public</i> ". However this is contradicted by text on page 66 that says " <i>there are 40 hectares of green space within our Neighbourhood Area; 32 hectares of this is accessible public space</i> ". The text needs to be amended to ensure consistency and accuracy. | For consistency and clarity. |
| DC2 | Recommend that, for conformity with the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Camden Local Plan, the first sentence of the policy ' <i>Protect and preserve the Dartmouth Park Conservation Area, historic buildings and</i> ' be amended to say: ' <u>Preserve or enhance the Dartmouth Park Conservation area.....</u> ' Criterion c) This expects development affecting a locally listed building to preserve or enhance the conservation area. Items on a Local List cannot be treated in the same manner as those in a Conservation Area. Conservation Area protection stems from the Planning (Listed Buildings and Conservation Areas) Act 1990s and places a statutory duty to preserve or enhance the character and appearance of the area. There is no Act of Parliament covering local listing and the NPPF in paragraph 197 is clear that the impact | To ensure conformity with the relevant legislation. |

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| | <p>of development on a non designated heritage assets it is a more balanced decision.</p> <p>For clarity it would therefore be better to split this part of the policy into two separate parts - one addressing buildings in conservation areas and one for those on the local list.</p> <p>Recommend amending the policy to</p> <p>c) in the case of any development affecting:</p> <p>i) any building that makes a positive contribution to the character and appearance of the conservation area identified in the Conservation Area Appraisal (Appraisal Appendix 2)</p> <p>ii) <u>or the setting of any of them only permitting development that is designed to a high standard, preserves or enhance the character and appearance of the Conservation Area and makes a positive contribution to local distinctiveness</u></p> <p>d) <u>in the case of development affecting any of the locally-listed and other heritage assets identified in Appendix 2, or their settings, only permitting development that is designed to a high standard."</u></p> <p>e) encouraging development</p> <p>Consequential changes should also be made to the supporting text (first paragraph page 24) to ensure clarity and consistency.</p> | |
| Page 24 1 st para | <p>Camden does not place buildings identified in the conservation area appraisal as making a positive contribution to the area on the Local List. Local Listing offers a lower level of protection than inclusion in a conservation area so there is no benefit in doing so. The text should be amended to reflect this and the suggested amendment to the Policy.</p> | To ensure the Plan is clear and unambiguous and consistent with legislation. |
| Policy DC4) | <p>The supporting text should acknowledge that, in addition to the policy criterion, if development is within the conservation area there remains a statutory duty to preserve or enhance the conservation area as per the Planning (Listed Buildings and Conservation Areas) Act 1990 and recognised in the Camden Local Plan.</p> | To ensure the Plan is clear and unambiguous and consistent with legislation. |
| H1 Criteria a) (ii) & (iii) and b) | <p>These criteria are design, rather than housing use, focused and repeat other policies within the Plan. Therefore for clarity we recommend that they are removed.</p> | To ensure the Plan is clear and unambiguous and ensure conformity with paragraph 17 of the NPPF |
| Page 45 2 nd para | <p>The reference to the Highgate Newtown Community Centre and the threat perceived by the Camden Community Investment Programme (CIP) is negative and does not identify that the existing facilities are in a poor state of repair which the CIP are reprovding at a higher standard. The text should be deleted or amended to give a more balanced account.</p> | For accuracy. |

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| Page 48 - 56 | The Neighbourhood Centre profiles include a large amount of descriptive and non-planning material. This would be more appropriate in an appendix. | To ensure that the plan is concise and easy to use. |
| Policy CE1 Criterion e) | This is not land use planning matter and not something that can be achieved through a planning policy, therefore criterion e) should be deleted from the policy (perhaps moving to the Projects in Appendix 5). | To ensure the Plan is clear and unambiguous about what matters it can influence. |
| Policy C4 supporting text | The text should recognise that some of the changes of uses covered in the policy could take place under permitted development rights without the need for a planning application and therefore will not be able to be controlled through the policy. | To ensure the Plan is clear and unambiguous and consistent with legislation. |
| Fig 7A Page 70 | The scale of the map means that it remains difficult to read and the groupings are unclear in places. It is recommended that larger scale maps of each of the spaces are included in Appendix 4. | To ensure the Plan is clear and unambiguous. |
| Figure 7A / Policy | <p>Para 77 of the NPPF 2012 states that the designation of land as Local Green Space should only be used where</p> <p>a) in reasonable close proximity to the community it serves</p> <p>b) demonstrably special to a local community and holds a particular local significance for example because of its beauty, historic significance, recreational value (including playing field) tranquillity or richness of wildlife</p> <p>c) local in character and is not extensive tract of land</p> <p>Ensuring the boundaries are correct is essential to ensuring successful application of the Plan and avoiding the need for formal amendments to the Plan in the future if errors come to light (as has happened with other neighbourhood plans).</p> <p>The Consultation statement states that the landowners were consulted prior to submitting the plan, which is welcomed (although relatively late in the process for them to engage). The Forum should confirm that they have also notified landowners of the submission and provided them with the opportunity to formally comment.</p> <p>There appear to be a number of areas where the proposed designated area may need amending to conform with the LGS requirements. These are :</p> <p>Figure 7A</p> <p>LGS2 Highgate Enclosures</p> <p>The designation includes a number of sections of road. These do not meet the criteria for Local Green Space and therefore should be removed from the designated area. This would be consistent with the open space designation in the Policies Map below. A larger scaled map would allow this to be shown more clearly.</p> | To ensure the boundaries accurately reflect the green areas to avoid the need for future corrections and ensure the proposed areas meet the criteria for Local Green Space designation. |



Extract of the Camden Policies Map

LGS 4 Mortimer Terrace Nature reserve

It is unclear why the boundaries of these spaces area different to the others in dotted form and should be amended to be consistent or the difference reflected in the key.

The area to the south of the railway line is not all currently designated open space on the Local Plan policies map as does not form part of the nature reserve or Asset of Community Value being referred to (which is the part to the north of the railway line) This space should therefore be amended to show just the Mortimer reserve area to the north of the railway lines and if you wish to include the area to the south a separate designation will be required with a justification.

LGS5 York Rise estate gardens and allotments

The boundaries are dotted lines which is different and should be consistent or the difference reflected in the key. The areas proposed include some gardens and allotments but also include parking areas and hardsurfaces and some temporary buildings which are not considered to meet the relevant tests and should therefore be refined to reflect the areas described. Larger scaled maps would assist in clarifying this also.

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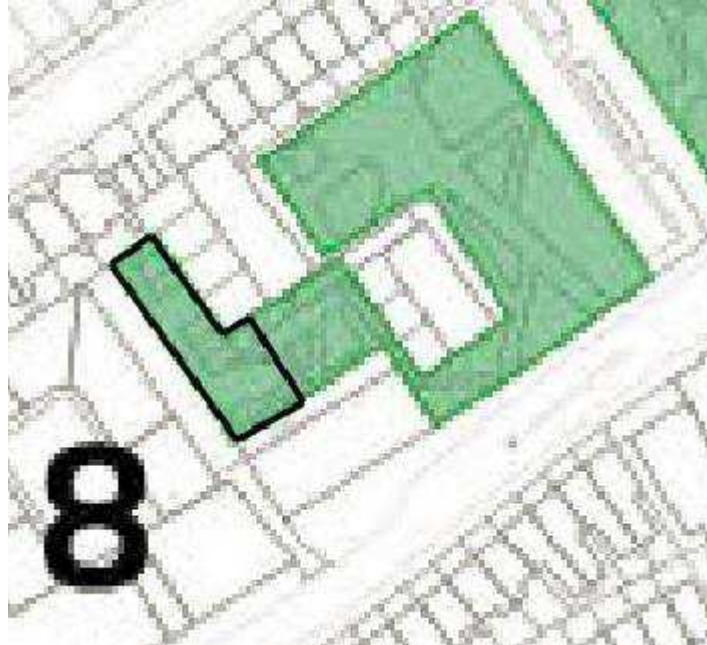
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LGS8 Haddo House - the designation appears to include some area of car parking/service road which is not considered to meet the criteria for LGS. The area highlighted in black below should therefore be removed.



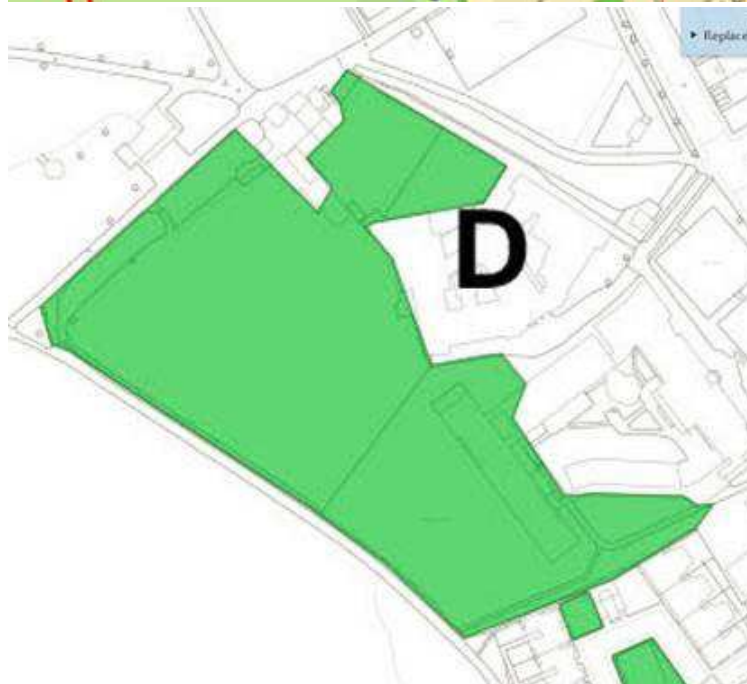
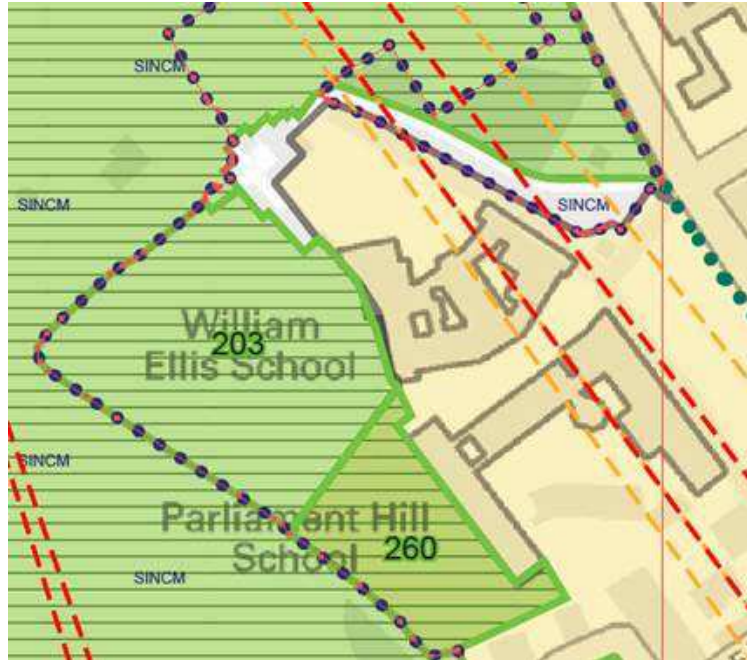
Policy
ES1 Part
B
Other
open
space
Appendix
4

B Community gardens and tennis court, Lissenden Gardens appears to include a third area not referred to in the text and appears to be rear gardens to the mansion blocks not currently designated as open space. It is recommended that area 3 (shown below) is removed or be fully justified in the text.



D Parliament Hill and William Ellis schools and open space.
The mapping includes Parliament Hill School buildings and for both

schools, includes areas not designated as open space on the Camden Policies Map and includes area of hardstanding which are not considered to meet the relevant tests. It is recommended that the maps be amended to match the Policies Map designations as below.



ES1
Criterion
c)

'Community gardens / allotment' - It is unclear whether the reference should be to Figure 7B or 7A, although in either case this would then duplicate protection for Local Green Space 5 as is also identified as site A and Other open space B which is site D. The policy and maps use different terminology and should be consistent and clear.

To ensure the Plan is clear and unambiguous, consistent with the NPPF.

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| Para 8.4 | Recommend that the aims also refer to improving safety for cyclists. | For consistency with Policy TS1 |
| Policy TS1 | <p>Criterion b) - Applications for dropped kerbs or crossovers are made under the Highways Act and do not fall under the scope of planning policy. Therefore criterion b should be deleted from the policy.</p> <p>There is a difference between dropped kerbs and crossovers , with the former provided to improve accessibility for wheelchair users and others with a mobility impairment, while the latter is for vehicle access for on-site parking. The Council would therefore not support resistance to dropped kerbs if they are provided as part of a scheme to deliver a more accessible and inclusive street.</p> <p>Criterion c) ii) - traffic calming measures do not fall under the scope of planning and would not be delivered as part of a development scheme. Therefore this part of the policy should be removed.</p> <p>If this is retained as a project / aspiration the Plan should explain what traffic calming measures, if speed humps are not supported, that the Forum would consider acceptable (and that would not be prohibitively expensive).</p> <p>Criterion d) Amend wording to include: <u>' pavement designs to provide a minimum 2m of effective free width subject to a maintaining a minimum carriageway width'</u></p> <p>And amend supporting text in 3rd para of page 85 to state that widening footways would be subject to a feasibility study, for example to consider the minimum carriageway width necessary so that large vehicles such as waste vehicles can still use the highway.</p> | This would ensure that Plan does not contain policies on matters that aren't controlled through the planning process. |
| Policy TS3 | <p>Criterion a) introduces a different definition of essential users to the Local Plan for car free development through the inclusion of (and not merely convenient), which could give rise to confusion. It is therefore recommended that the additional text be removed from the Policy and supporting text.</p> <p>Criterion c is unclear and 'any new' could be considered to be deeming car parking onsite is acceptable which would be contrary to and could undermine the Council's car free policy approach in the Camden Local Plan. Policy should be amended to specifically refer to Councils Policy T2.</p> | To avoid confusion and potentially undermining Camden's strategic approach to car free development. |
| Page 90 1 st para | The para " <i>In addition, the term Specific Neighbourhood Site or SNS when used in this Chapter 9 includes 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> " is confusing and should be amended to be clear what it is referring to | To ensure the Plan is clear and unambiguous, consistent with the NPPF. |
| Section 9 | The Plan is generally clear that the Specific Neighbourhood Sites section does not allocate sites but sets out the community's aspirations and detailed suggestions. However there are instances where the wording of the section states that development "will" do | To ensure the Plan is clear and unambiguous, |

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| | <p>something, rather than saying that, as elsewhere, development "should" do something. The use of "will" can cause confusion as to the status of the text in section 9, suggesting that it is more than aspirational or suggestive but can require or dictate a specific outcome. Therefore the following amendments should be made to ensure the plan is clear and unambiguous.</p> <p>p94</p> <ul style="list-style-type: none"> Any developer should will be expected to undertake robust townscape and heritage impact analysis to ensure that key views and heritage assets are protected in any development of the site. <p>p97</p> <ul style="list-style-type: none"> The development should will be expected to provide the maximum amount of affordable housing provided for in the Local Plan policies. <p>p99, p101 and p103 (This sentence appears on each of these pages)</p> <ul style="list-style-type: none"> The development should will be expected to provide the maximum amount of affordable housing provided for in the Local Plan policies and this Neighbourhood Plan. <p>p104</p> <ul style="list-style-type: none"> The remainder of the site (outside the footprint of the existing garage) should will remain open space and remain accessible to the public. | <p>consistent with the NPPF.</p> |
| <p>Para 9.4.1 Murphy's Yard</p> | <p>The draft neighbourhood plan notes that the aspirations in Murphy's Yard are based on evidence work, which includes the Framework Masterplan produced by AECOM. The masterplan explores two options for the site and whilst Option 1 is noted as being higher density, it is unclear why other higher density options have not been explored/tested to maximise housing provision in line with the Local Plan. The Council would expect that a study to inform densities would include consideration and modelling of a wider range of options to show how densities have been maximised.</p> <p>The Camden Local Plan (paragraphs 2.7 – 2.18) provides background on how the Council proposes to deliver growth. High quality development with high densities is encouraged to make the best possible use of limited land. The Council expects the density of housing development to take account of the London Plan's density matrix, and considering Camden's accessibility, densities are expected at the higher end of the matrix, subject to other policy considerations. Local Plan policy H1 expects the maximum reasonable provision of housing compatible with any other uses needed on a site.</p> <p>The neighbourhood plan refers to a figure of 500 homes being accommodated on the Murphy site. However the masterplan shows that Option 1 would produce 676 homes (p17). Therefore the figure in the Plan is not consistent with the evidence report and would not maximise housing provision, contrary to the Local Plan.</p> | <p>To ensure consistency with the strategic approach in the Camden Local Plan and the London Plan.</p> |

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| | <p>The plan states (p95/96) that this equates to around 125 dwellings per hectare, which is significantly in excess of densities elsewhere in the Area. However, the Murphy site borders Kentish Town (for around half of its boundary) and Gospel Oak as well as the Dartmouth Park neighbourhood area and these areas should be considered when the site's context is considered.</p> <p>While the Council understands that the plan is setting out aspirations in Chapter 9 rather than formal allocations, given the issues set out above with conformity with the Local Plan's strategic approach and the relationship between the neighbourhood plan and the evidence report, we suggest that either reference to specific building heights, densities etc. are taken out of the plan, or that the plan states clearly that these figures are for guidance, and that any scheme for the development of the site must carry out further detailed design work to further test acceptable heights and densities which must be in accordance with all relevant Local Plan and London Plan, as well as neighbourhood plan policies.</p> | |
| <p>Page 95 Building heights 3rd Para</p> | <p>First bullet - This states that: <i>"... Given the topography of the site, this would imply no new buildings above five storeys within the Protected Corridor (as defined in the KTNF Plan). The wording of the policy in the Kentish Town Neighbourhood Plan also means that it is unlikely that any buildings above five storeys would be acceptable within the Peripheral Corridor identified in that plan."</i></p> <p>Notwithstanding this sets out aspirations rather than requirements through an allocation, this text implies that the Kentish Town Neighbourhood Plan restricts building heights in the Peripheral corridor to five storeys, which is not the case. Rather Policy D1 of the KTNP states that: <i>"The uninterrupted view towards Parliament Hill from the area adjacent to Kentish Town Station as defined in the "Protected Corridor" and "Peripheral Corridor" identified on Maps 2 and 3, is required to be maintained, as far as possible, for future generations. Development that takes place within the "Peripheral Corridor", must be compatible with the view in terms of its setting, scale and massing."</i></p> <p>In addition, it is usual, and reasonable, that the limitations on development within a peripheral corridor are less stringent than in the viewing corridor itself (see the London View Management Framework, the approach of which formed the basis of the protected view in the KTNP), while the text above indicates that the same height restriction should apply to both the protected corridor and the peripheral view.</p> <p>This part of the Plan should therefore be deleted or amended for accuracy and clarity.</p> | <p>To ensure the Plan is accurate, clear and unambiguous, and for consistency with the Kentish Town Neighbourhood Plan.</p> |
| <p>P101 1st para</p> | <p>The text is critical of the consented scheme. We note that text was deleted from the Neighbourhood Plan for Highgate (which borders Dartmouth Park) on the recommendation of the Independent Examiner who found that it was "unhelpfully critical of previous policy and practice" and we consider that critical text on page 101 should similarly be deleted.</p> | <p>For clarity</p> |

From: Hassan Ahmed [REDACTED]
Sent: 03 May 2019 10:53
To: info@dpnf.org.uk; PlanningPolicy
Cc: Celeste Giusti
Subject: RE: RE: Dartmouth Park Neighbourhood Plan – Regulation 16 Consultation
Attachments: FINAL - Dartmouth Park Neighbourhood Plan.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam

Thank you for consulting the Mayor of London on the Dartmouth Park Neighbourhood Plan (DPNP) (Regulation 16) consultation. As you are aware, all Development Plan Documents in London, including Neighbourhood Plans, must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Framework (NPPF) 2018 requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Dartmouth Park Neighbourhood Area includes the London Plan and Camden's Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have provided comments, which I endorse, and which are attached to this email.

The DPNP is in general conformity with the current and Draft New London Plan. This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the emerging Draft New London Plan.

The draft new London Plan

The Mayor published his Draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of Camden's Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the submission of the DPNP, it is likely that it will be required to be in general conformity with the new London Plan. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

General

Officers welcome the DPNP objectives listed at paragraph 2.4 including enhancing the predominantly residential character of the area and strengthening community cohesion; ambitions which build on the Mayor's Good Growth Policies, especially Policy GG1 Building strong and inclusive communities. In addition, Officers would like to see more proactive objectives that would help deliver much needed housing across the capital and within the London Borough of Camden in accordance with Good Growth Policy GG2 Making the best use of land. The Neighbourhood Plan should recognise that Camden's housing target has recently increased from 889 to 1,086 homes per annum and ideally the neighbourhood plan should establish how it will positively contribute towards this. A proactive approach would include site allocations (and not merely site identification) which the DPNP lacks. Four potential development sites have been identified and include future aspirations for the DPNP.

Officers also welcome the Neighbourhood Plan's identification of additional buildings of heritage importance which are not Statutorily Listed nor included in Camden's list of local heritage assets affording them a level of greater consideration in the planning process. This builds upon the approach set out in paragraph 7.1.2 of the Draft New London Plan and is welcomed by the Mayor.

Officers recognise and welcome the inclusion of Policy DC4 which positively promotes residential extensions that respond to local context and enable residents to expand existing properties rather than having to move out of the area in search of more suitable accommodation. The policy should also support the development of extensions in appropriate circumstances where these allow the conversion of properties to form a larger number of dwellings which in turn would contribute towards meeting the borough's housing targets. The Neighbourhood Plan should consider where and how this type of development would be considered acceptable, especially in those areas where the presumption in favour of small housing development would apply in line with Draft New London Plan Policy H2.

Officers consider that references throughout the DPNP describing the area as 'semi-rural' are misleading and fail to recognise that while much of the area exhibits pockets that could be described as having 'leafy village feel', much of the area is characterised by fairly high-density development including purpose-built flats and post-war housing developments which give the area a much tighter urban grain. The DPNP should be amended accordingly.

25% of the Camden Community Infrastructure Levy (CIL) is available for local spending, predominantly by neighbourhood forums with adopted neighbourhood plans. The DPNP does not set out a list of local priority projects, potential costings and indicative timings. The forum is therefore advised to set out such a list of priority projects to be funded by the CIL receipts it receives in agreement with the London Borough of Camden. The use of neighbourhood funds should therefore match the priorities expressed and agreed by the local community and should be clearly set out in the neighbourhood plan. Failure to include such projects reinforces the overall negative approach adopted by the DPNP.

Housing

Officers would support and welcome a neighbourhood housing apportionment figure which should be agreed with London Borough of Camden. The Neighbourhood Plan should proactively and positively set out how it will contribute towards delivering Camden's housing target now and throughout the plan period. The absence of such an approach means that the Neighbourhood Plan is not as positive and proactive as it might have been and does not actively promote Good Growth Policy GG2 of the Draft New London Plan.

The DPNP should recognise and reflect that the Mayor has strengthened his intention to secure on-site affordable housing in the Draft New London Plan and should take into account Draft New London Plan (showing minor suggested changes) Policy H5, paragraph 4.6.8A and paragraphs 4.5.5 – 4.5.8.

Officers welcome the DPNP's intention to maximise tenure integration in line with paragraph 3.4.5B of the Draft New London Plan (showing minor suggested changes). The DPNP should also promote the pepper-potting of affordable housing throughout a development to ensure maximum integration is achieved in accordance with the guidance set out in the Mayors Affordable Housing and Viability SPG (2017).

Neighbourhood Centres

The DPNP should recognise that retailing and town centres across the country are experiencing change and challenges brought about by multi-channel shopping, changes in consumer behaviour and technology. In recognition of this, Policy CE1 should be flexible enough to enable the area's neighbourhood centres to adapt and diversify in order to maintain the integrity, vitality and vibrancy of centres and avoid high numbers of vacancy. The DPNP should consider the full range of town centre uses beyond A1 as set out in the Glossary of the Draft New London Plan and should re-evaluate Policies CE1(a) and CE1(c) which are considered to be overly restrictive. The DPNP should follow the guidance set out in Draft New London Plan Policy SD6B.

Policy CE3 should ensure that accessibility is addressed and should also include the principles embodied in the Mayor's Healthy Streets Approach as mentioned earlier. The DPNP should follow the guidance and principles set out in Draft New London Plan Policies D7 and T2.

Transport

Since the previous draft of the Neighbourhood Plan, a number of TfL's suggestions have been incorporated into this revised draft, which is welcomed. There are a number of references to, and policies and proposals within the Neighbourhood Plan which are consistent with the Healthy Streets approach identified within the Mayor's Transport Strategy (MTS) and the draft London Plan. A key element of the Healthy Streets approach is encouraging active travel, which in turn will support achieving the Mayor's target of 80 per cent of all journeys to be made by foot, cycle or public transport by 2041. Policies TS1 Safety and accessibility for pedestrians and cyclists and TS2 Cycling Improvements, which seek to improve the cycling environment within the Neighbourhood Area, will help to support achieving the aforementioned strategic aim. However, care should be given that any improvements are not to the detriment of other modes of sustainable and active transport, such as buses. TfL have provided a number of suggestions for the Neighbourhood Plan to further align it with draft London Plan policies and best practice, which have been appended to this letter.

Specific Neighbourhood Sites

The DPNP identifies four potential development sites but states that these are not to be considered site allocations but are instead, aspirational, providing detailed suggestions how these sites could be developed. The Mayor's Good Growth Policy GG2 Making the best use of land (Draft New London Plan), encourages proactive approaches to the delivery of sustainable development and building on from this the DPNP should allocate three of its identified sites. Murphy's Yard should be excluded for the reasons set out below.

Murphy's Yard

Murphy's Yard forms part of the Kentish Town Industry Area, the only designated Locally Significant Industrial Site (LSIS) in the borough. Both Camden's Local Plan and the Draft Kentish Town Development Framework (2018) seek the release of the southern Regis Road part of the site from its industrial designation and instead are designating and promoting it as a local Growth Area, which includes replacement industrial capacity. As such, Murphy's Yard still retains its LSIS designation and proposed future development on this site should be predominantly industrial in nature and apply the principle of no net loss of industrial floorspace capacity in accordance with Draft New London Plan Policy E4. Furthermore, the proposed release of the southern portion of the site from its industrial designation may result in Murphy's Yard having to accommodate an increase in industrial floorspace to off-set any loss of industrial floorspace experienced at Regis Road. The DPNP should recognise the above issues, acknowledge the complexity involved in bringing forward non-industrial uses on this site and note that this will form a considerable part of the emerging Kentish Town Planning Framework.

The proposed introduction of non-industrial uses here would need to ensure that they would not affect the ability of existing industry to function effectively in accordance with Draft New London Plan Policy E7. The Mayor would also expect to see servicing and logistics floorspace re-provided as well as floorspace supporting last mile distribution and other related service functions within or close to the CAZ to support the needs of businesses and activities within these areas. For these reasons officers would advise that Murphy's Yard not be included as part of site suggestions/allocations within the DPNP

I hope these comments inform the development of the DPNP. If you have any specific questions regarding the comments in this letter please do not hesitate to contact Hassan Ahmed [REDACTED]

Regards

Hassan Ahmed

Senior Strategic Planner, London Plan Team
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

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Monday – Friday, 9-10am until 4-6pm

From: McLaughlin Gavin [REDACTED]
Sent: 12 April 2019 16:55
To: PlanningPolicy
Cc: Vos Josephine
Subject: Dartmouth Park Neighbourhood Plan latest version - TfL comments
Attachments: 13062018 TfL comments FINAL.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Camden Planning Policy team,

Thanks for re-consulting us on this Neighbourhood Plan.

Firstly, I'd like to thank you and the Neighbourhood Forum for taking many of my previous comments on board in a very even-handed and receptive way. The vast majority of the document is strongly supported by TfL. Well done on your progress so far with it!

However, we continue to object to the definition of the area as of 'semi-rural' character, which should be removed from the document. For the same reasons I originally outlined (see attached letter).

Defining a neighbourhood with such an accessible neighbourhood as semi-rural would represent a very negative precedent for neighbourhood planning in London, with potential for unintended consequences in strategic transport planning that in my opinion could be quite dangerous for the Mayor's Transport Strategy and draft London Plan.

As a result I would be willing to engage with the Planning Inspectorate on this matter.

Please let me know what kind of next steps are likely in response to this objection.

Thanks and kind regards,
Gavin McLaughlin | Principal Planner
Spatial Planning | City Planning

[REDACTED]
Level 9, 5 Endeavour Square, Westfield Avenue, Stratford E20 1JN
[REDACTED]

We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more info please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

Our ref: 18/2068

Dartmouth Park, LB Camden

Planning Policy Consultation

By email: info@dpnf.org.uk

CC: planning@camden.gov.uk

Transport for London

Spatial Planning

Level 9

5 Endeavour Square

Westfield Avenue

Stratford E20 1JN

13 June 2018

Dear Sirs/Madams,

RE: Dartmouth Park Neighbourhood Plan consultation draft

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

Thank you for consulting TfL Spatial Planning on the draft Neighbourhood Plan.

The draft London Plan was published on 29 November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. We are now expecting all new planning policy documents to give material consideration to the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

Firstly I would like to reiterate that TfL Spatial Planning is keen to work with the Council to deliver aspirations for sustainable growth in the borough and Dartmouth Park area.

On behalf of TfL I also wish to submit a number of General and Detailed comments, as follows:

General Comments

Healthy Streets

Throughout the documents there is no explicit mention of Healthy Streets, although many key Healthy Streets principles are included.

Given the Mayoral focus on these themes and the Healthy Streets for London Toolkit we have published (<https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>), it would be good to explicitly reference to Healthy Streets principles and indicators in the document.

Generally, TfL is supportive of the policies and proposals put forward, as they are consistent with the Healthy Streets approach of the Mayor's Transport Strategy (MTS) and new draft London Plan.

The plan's focus on protecting and enhancing community facilities including the local shopping centres and parades is also welcomed by TfL, as these facilities help to encourage healthier, more active and car-free lifestyles in which more shopping and leisure is done locally, often by bike or on foot. We agree that the neighbourhood should remain 'a cohesive locality with shared, well-used facilities.' (p. 14)

Vision Zero

The Mayor and TfL have also committed to delivering a 'Vision Zero' approach in London to make its streets safer for all. Minimising road danger is fundamental to the creation of streets where everyone feels safe walking, cycling and using public transport. As a result we are aiming for no one to be killed in or by a London bus by 2030, and for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041.

As a result we strongly support Policy TS1 and its aim to 'make Dartmouth Park safer and more accessible for pedestrians and cyclists'.

Buses

The Forum should note that buses are essential to Healthy Streets due to the 'People choose to walk, cycle and use public transport' indicator. A successful transport system enables more people to walk and cycle more often (see <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>)

In the Dartmouth Park Plan Area, Swains Lane, Chester Road, Raydon Street, and St Albans are all narrow roads used by route C11. We also operate routes 4 (Dartmouth Park Hill), 214 (Highgate Road and Highgate West Hill) and C2 (Highgate Hill and Swains Lane).

The plan acknowledges that some of the above streets are currently narrow and congested, and includes policies and projects designed to reduce the effects of traffic on residents, whilst maintaining and enhancing the public transport that serves Dartmouth Park. This is welcome. We also support the Plan's clear acknowledgement that public transport accessibility – including buses – is essential for the Neighbourhood Plan area.

The section headed 'Justification for Policy TS3' (p. 80) suggests that buses contribute towards a negative environmental impact. However an increase in bus use is crucial to help improve the local environment and promote public health by supporting a shift away from private motorised vehicles.

TfL Buses would be supportive of any initiatives in the Plan Area that protect or improve bus journey times; such as the extension of existing bus lanes, both physically and in terms of hours of operation.

Finally, route C2 terminates at Parliament Hill Fields, then circumnavigates the roundabout at Swains Lane and heads back down Highgate Hill. As a result it is essential this turn is maintained by any street works or public realm improvement projects in the neighbourhood area.

Mayor of London

A number of references are made in the document (Chapter 10) to the City of London Corporation which appear to be an error. These should be replaced with 'Mayor of London' or 'Greater London Authority'.

Detailed comments:

2.2 Issues and opportunities

The final bullet point on "coping with the transport and environmental implications" is worded quite negatively with too much focus on private vehicles. The language could be changed to specify the routes referred to are roads and streets rather than public transport or cycling routes. The issue could also be treated and explicitly identified as an opportunity to increase the quality of local roads and streets as walking and cycling routes. Finally the term 'cross-London route' is somewhat unclear; 'East-West route' might be more appropriate.

2.3 Our Vision for Dartmouth Park

This section should mention improving the local population's healthy by increasing active travel in the Plan Area. Currently it seems too focused on abstract characteristics of the built environment and Dartmouth Park itself as a geographic area. However it would benefit from discussing and setting out aspirations for how the Neighbourhood Plan can help Londoners as people.

This would follow a similar approach to recently published documents such as the Mayor's 'A City for All Londoners' (available from <https://www.london.gov.uk/get-involved/all-consultations/city-all-londoners>) and TfL's 'Healthy Streets for London' (available from <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>), both of which are reflected throughout the Mayor's Transport Strategy (MTS, 2018, available from <https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018>)

2.4 Our Objectives

The reference to 'Transport and Streets' is strongly supported by TfL.

Policy TS1 Safety and accessibility for pedestrians and cyclists

The recommendation that low trafficked crossovers should have a continuous footway treatment is supported. However continuous footways can be inappropriate for more highly trafficked intersecting side roads.

This policy could also be supported with timed traffic closures around schools, which Camden Council have already implemented elsewhere to reduce vehicular drop-off / pick-up and give more space for walking.

Policy TS2 Cycling improvements

It would be worth referencing the London Cycling Design Standards (LCDS, available from <https://tfl.gov.uk/corporate/publications-and-reports/streets>) in this section. More specific language could also be included on improving cycling comfort by providing segregated carriageway space for cycling where appropriate, reducing motor vehicle dominance, rationalising on-street cycle parking and encouraging developers to incorporate dedicated cycling facilities.

Policy TS3 Traffic reduction

We recommend considering the role that filtered permeability could potentially play in existing and new streets to reduce through motor vehicle traffic and improve conditions for walking and cycling.

Policy DC3 Requirement for good design

TfL Spatial Planning is generally supportive of this policy, particularly sub-section (g) on developments providing cycle parking and delivery space 'to ensure a high quality and well managed streetscape'.

However the understanding of urban design expressed in the policy and throughout the document seems to neglect public space between buildings, which is dealt with only as 'hard and soft landscaping of the existing streetscape' in the supporting text (p. 25).

Issues such as the permeability and legibility of the street network to pedestrians and cyclists are key parts of successful and functional urban design, which seems to be acknowledged only briefly in the policy as 'the scale and rhythm of the streets' (p. 14) and also, again vaguely, on the next page:

'The neighbourhood's cohesiveness is enhanced by the convenient and attractive linkages offered by a pattern of streets on a rough grid, with short pedestrian cut-throughs, paths and passages adding to people's route choices.' (p. 15)

TfL Spatial Planning would suggest that the Plan should mention walking, cycling and public transport in both the Design and Transport policy sections.

For further guidance on integrating these two elements, the Forum should consult new draft London Plan such as GG2 (Making the best use of land), GG3 (Creating a Healthy City), D1 (London's Form & Characteristics), T2 (Healthy Streets), T5 (Cycling), D7 (Public Realm), all of which clearly prioritise

and promote public transport and active travel as critical to London's current and future built environment and urban design. Also, our Liveable Neighbourhoods programme, which could provide inspiration and is highly relevant (see <https://tfl.gov.uk/info-for/boroughs/liveable-neighbourhoods>).

Policy DC1 Enhancing the sense of place

Part (b) of Policy DC1 is broadly supported by TfL Spatial Planning in line with Policy G7 (Trees and Woodlands) of the draft new London Plan and current London Plan Policy 5.10 (Urban Greening).

That said, the second sub-section should perhaps refer to 'publicly accessible' green or open spaces, as the policy could currently be used to justify a private green or open space being maintained or replaced even if an important community or transport-related land use was being proposed to replace it.

TfL Spatial Planning would also encourage the Forum and Council to consider defining Dartmouth Park as 'Urban' in the Neighbourhood Plan rather than 'semi-rural'. It is too centrally located within London to reasonably be considered 'semi-rural', especially as Kentish Town, which is defined as a District Centre in Annex 2 of the current London Plan, is located 800m South, and the Public Transport Accessibility Level (PTAL) ranges from 3 – 6b in the vast majority of the Plan Area.

Policy ES2 Trees

We do not support the removal of healthy trees from the Transport for London Network (TLRN) unless there is clearly no viable alternative and removal is for an essential purpose. The Neighbourhood Forum may wish to take a similar stance in line with the above policies and Proposal 43 of the Mayor's Transport Strategy (MTS).

Para 1.2.6 of the draft new London Plan also states: 'delivering 50 per cent green cover across London, will be important to help London become a National Park City.'

Increasing the total number of trees and diversity of tree species, though positive, could still happen without supporting the Mayor's National Park status and biodiversity aspirations. It would therefore be advisable to change the policy wording at sub-sections (b) and (d) so that they apply to the spatial amount of tree canopy cover rather than the 'number of trees' or 'tree diversity'.

This can prevent mature trees being replaced by small sub-standard trees which provide less ecosystem and biodiversity benefits

Appendix 7 – Projects

The area contains no parts of the TLRN or Strategic Road Network (SRN) and changes to the highway are therefore mainly a matter for Camden Council.

However some proposed projects could involve widening footways and reducing speed limits. The Plan should therefore explicitly mention that maintaining a strong easily accessible bus network is reliant on maintaining good bus journey times, and that any changes to road layouts to support cycling, walking and Healthy Streets should also maintain or improve bus journey times.

Whilst we strongly support the aspiration for improved pedestrian access to Gospel Oak station, the improvements proposed are not part of TfL's current confirmed investment programme and would require extensive further discussions with Network Rail and TfL Rail on funding, design and delivery.

Other initiatives the Forum could consider are:

- Neighbourhood-scale traffic management, especially through local roads, to minimise through-movement by motorised traffic
- Improving permeability on existing roads for cycling, e.g. more contraflows on one-way streets, gaps to permit cycle movement where there is no motor vehicle access
- Exploring Cycle Streets, Play Streets and temporary closures for events, play, etc. These are ways of changing the balance between users and promoting active travel and a more diverse use of streets and public spaces in line with paragraphs J and K of Ppolicy D7 of the new draft London Plan (2017).

I hope you find these comments useful and take them into consideration. If you have any questions or clarifications, please let me know.

Yours sincerely,

Gavin McLaughlin

Planner

TfL Borough Planning

Email: gavinmclaughlin@tfl.gov.uk

Direct line: (020) 7027 9086



Sent by email: planningpolicy@camden.gov.uk

 thameswaterplanningpolicy@savills.com

 0118 9520 503

3rd May 2019

London Borough of Camden –Dartmouth Park Neighbourhood Plan - Draft Plan Submission

Dear Sir/Madam,

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

Murphy’s Yard

Thames Water support the reference to it being the responsibility of developer to make proper provision for surface water and drainage to ground, water course or surface water sewer on page 94 and would like to see this taken forward to the next version of the Plan.

Further engagement with Thames Water

Thames Water recently attended a workshop with Camden where the Kentish Town development was discussed. At that time Thames Water advised that water and waste water capacity would need to be further assessed to fully understand any requirements. However to make this assessment we would require further information on the scale, location and phasing of the development

We would also like bring to your attention that key drainage assets pass through this area. Thames will want to ensure that these are safeguarded, therefore early engagement is key

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

Yours sincerely,

Thames Water Utilities Ltd



Historic England

By email : Planningpolicy@camden.gov.uk

Our ref. PL00389563

FAO

Telephone 020 7973 3717

Planning Policy

Regeneration and Planning

London Borough of Camden

Judd Street

London

WC1H9JE

8 April 2019

Dear Camden Planning Policy Team

**Draft Dartmouth Park Neighbourhood Plan & SEA Screening Opinion: Submission
Draft 2019**

Thank you for consulting Historic England in respect of the Draft Neighbourhood Plan
Renewal for Dartmouth Park.

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

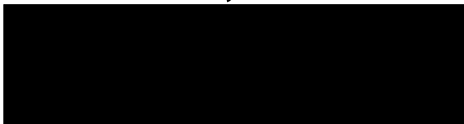
influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan.

Having reviewed the Draft Plan we do not consider it necessary to raise any specific concerns relating to the historic environment or issues which would affect the interests of Historic England in an adverse way. Overall we consider the Draft Plan to be well considered and to set out policies which are proportionate and will help to support local historic character. As such we are content for the Plan to be determined by the local authority, on the basis of advice from its own planning and specialist conservation team, in accordance with the Localism Act and Neighbourhood Planning Regulations.

If however you consider the proposed plan to raise issues for the historic environment which would benefit from clarification or comment from ourselves please do not hesitate to contact us.

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

Yours faithfully



Richard Parish

Historic Places Adviser

From: Claire McLean <Claire.McLean@canalrivertrust.org.uk>
Sent: 03 April 2019 10:04
To: PlanningPolicy
Subject: RE: Notice of submission of Dartmouth Park Neighbourhood Plan
Attachments: image005_wmz

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Policy Team,

Thank you for this consultation. I can confirm that as the Trust has no land or waterspace close to the Dartmouth Park Neighbourhood Plan Area, we have no comments to make.

Kind regards,

Claire McLean MRTPI

Area Planner London

M 07484 904271

Canal & River Trust

The Toll House, Little Venice, Delamere Terrace, London W2 6ND

Please note, my working days are Tuesday, Wednesday and Thursday.



canalrivertrust.org.uk

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From: Planning <planning@theatretrust.org.uk>
Sent: 23 April 2019 12:06
To: PlanningPolicy
Subject: Consultation response - Dartmouth Park Neighbourhood Plan

Good Afternoon

This e-mail sets out our representation on the draft Dartmouth Park Neighbourhood Plan.

We consider that the Plan meets the Basic Conditions. We are particularly supportive of Policy CM1, which seeks to retain and develop community facilities within the plan's boundary. Dartmouth Park contains a number of community facilities including five pubs and the Parliament Hill Bandstand. The Bandstand provides access to live performance, and pubs provide opportunities for access to the arts and culture at a grass-roots level. We consider that this policy compliments Camden's Local Plan and paragraph 92 of the NPPF (2019).

Kind regards,

Tom Clarke MRTPI
National Planning Adviser

Theatres Trust

22 Charing Cross Road, London WC2H 0QL

T 020 7836 8591

E tom.clarke@theatretrust.org.uk

W theatretrust.org.uk

From: ROSSI, Sacha <Sacha.Rossi@nats.co.uk>
Sent: 14 March 2019 13:24
To: PlanningPolicy
Cc: NATS Safeguarding
Subject: RE: Notice of submission of Dartmouth Park
Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

NATS has no comments to make on the Camden Neighbourhood Plan.

Regards
S. Rossi
NATS Safeguarding Office



Sacha Rossi
ATC Systems Safeguarding Engineer

D: 01489 444 205

E: sacha.rossi@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk/windfarms



KENTISH TOWN NEIGHBOURHOOD FORUM'S COMMENTS ON PROPOSED DARTMOUTH PARK
NEIGHBOURHOOD FORUM PLAN

Kentish Town Neighbourhood Forum (KTNF) welcome Dartmouth Park Neighbourhood Forum's (DPNF) proposed Neighbourhood Plan (NP). However, wish to make some comments, which will be limited to that part of the NP that relates to Murphy's Yard (the Murphy site). The reason for this limitation is that the Murphy site is partly within KTNF's area and is dealt with in detail in KTNF's made Neighbourhood Plan.

The policies in the Plan should not limit the potential development over the totality of the Murphy site.

As the NP contains policies affecting the Murphy site it would be appropriate if it stated whether the landowners agree with the proposals.

The NP does not adequately respond to points that KTNF made on the previous draft of the NP in relation to building heights and density. KTNF considers the reference to 500 homes, 30,000 sq. m of employment use and 5000 sq. m of community use across the entire site to be too prescriptive. The NP puts a lot of emphasis on findings by AECOM. By saying it is the upper end of the density matrix could mean that the site does not maximise the potential opportunity across the entirety of the Murphy's. The site might be able to accommodate more without significantly affecting the other aspirations around "good development, context of the surrounding area etc."

KTNF also consider the comments on page 95 of the NP about the heights on the periphery of the viewing corridor to be problematic. The KTNF Neighbourhood Plan says development in that area must be "compatible with the view in terms of its setting, scale and massing"; it does not set a height limit.

DPNF deal with the Murphy site in detail from p 91 in SNS1 Community Engagement in the NP. The stated vision of mixed residential and business/employment uses broadly accords with KTNF's vision.

In relation to the development of the Murphy site and Regis Road, there seems to be a conflict between p 93 (the NP seeks to keep the development of the two sites separate) and p 97 (any development framework for the Murphy site should provide for development in conjunction with Regis Road). The draft Kentish Town Planning Framework expects the development of the two sites to be 'coordinated' (p 4). It is not clear if the reference in the NP to the Murphy site in this context is

to that part only that lies within the DPNF area (5.5 hectares of a total of 6.8 hectares). Camden's draft Planning Framework appears not to distinguish between the KTNF and DPNF parts of the site, which reinforces the KTNF view that the NP appears to be treating the DPNF part as a separate unit, so conflicting with both Camden's and KTNF's approach.

Two of the dominant themes in the NP are the preservation of greenery and views. With that in mind, KTNF wonder if the NP is seeking to locate the bulk of any development on the KTNF part of the site. If that is not what is intended, clarification is required to avoid any further confusion.

In its general comments (p 15 Community engagement), the NP states that high rise blocks are not appropriate. An exception to this is made in the case of the Murphy's site (p 95) where 'community aspirations' accept building heights above 5 storeys in the western part of the site. As far as site capacity and density are concerned, the NP mentions 500 homes covering both parts of the site. As we have already said, we consider this to be too prescriptive.

Kentish Town Neighbourhood Forum

2.5.19

From: Mandy Seeburn <seeburn@williamellis.camden.sch.uk>
Sent: 02 May 2019 12:22
To: PlanningPolicy
Subject: DPNF Plan - Revised Objection from William Ellis School
Attachments: Official Copy (Register) - NGL643550.pdf; Official Copy (Title Plan) - NGL643550.pdf

Importance: High

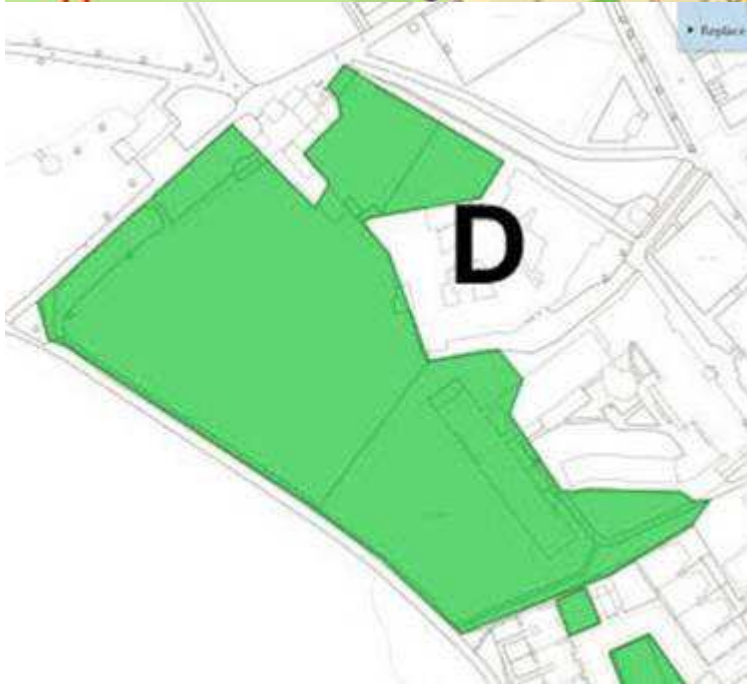
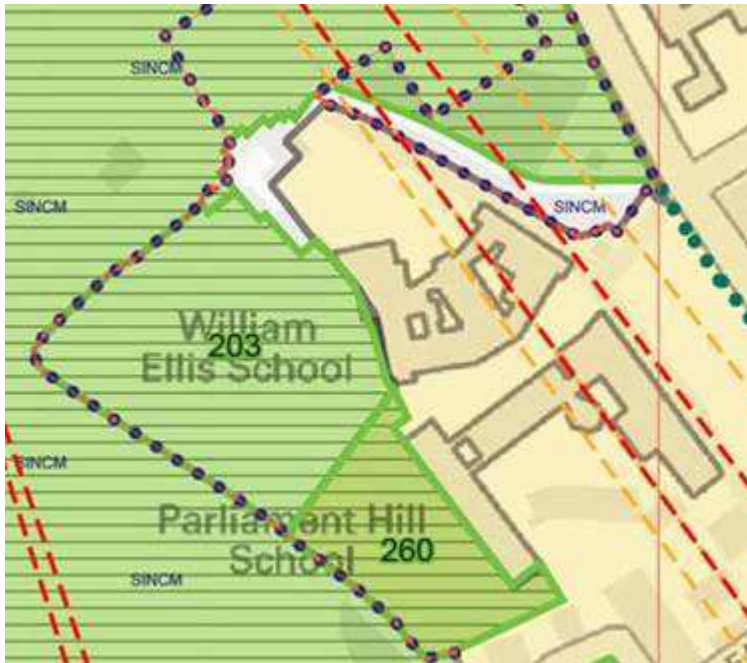
Dear Sir or Madam

I have just received the DPNF Plan Consultation document from a colleague in Camden and would like to make an objection to the plan in reference to William Ellis School.

William Ellis is a Voluntary Aided school, London Borough of Camden is the freeholder of the land but it is leased to The Birkbeck and William Ellis Schools Trust on a long term lease for 999 years – I therefore request that the areas highlighted below in Plan D, which are within the school boundaries are removed from the DPNF plan.

Regards,
Mandy Seeburn

D Parliament Hill and William Ellis schools and open space. The mapping includes Parliament Hill School buildings and for both schools, includes areas not designated as open space on the Camden Policies Map and includes area of hardstanding which are not considered to meet the relevant tests. It is recommended that the maps be amended to match the Policies Map designations as below.



Mandy Seeburn
Director of Operations
William Ellis School
Highgate Road
London
NW5 1RN

020 7692 3843

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number NGL643550

Edition date 29.11.2016

- This official copy shows the entries on the register of title on 07 MAR 2017 at 11:15:46.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 07 Mar 2017.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

- 1 The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being William Ellis School, Highgate Road, London (NW5 1RN).
- 2 (05.05.2009) The land tinted pink on the title plan has been added to the title.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (30.08.1989) PROPRIETOR: THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF CAMDEN of Town Hall, Judd Street, London WC1H 9LP.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 Lease dated 26 February 1943 to The Trustees of The Birkbeck and William Ellis Schools Trust for 999 years from 25 March 1936.

NOTE 1: The lease comprises also other land

NOTE 2: No copy of the Lease referred to is held by Land Registry.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

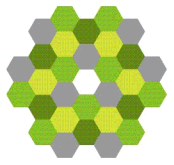
Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from Land Registry.

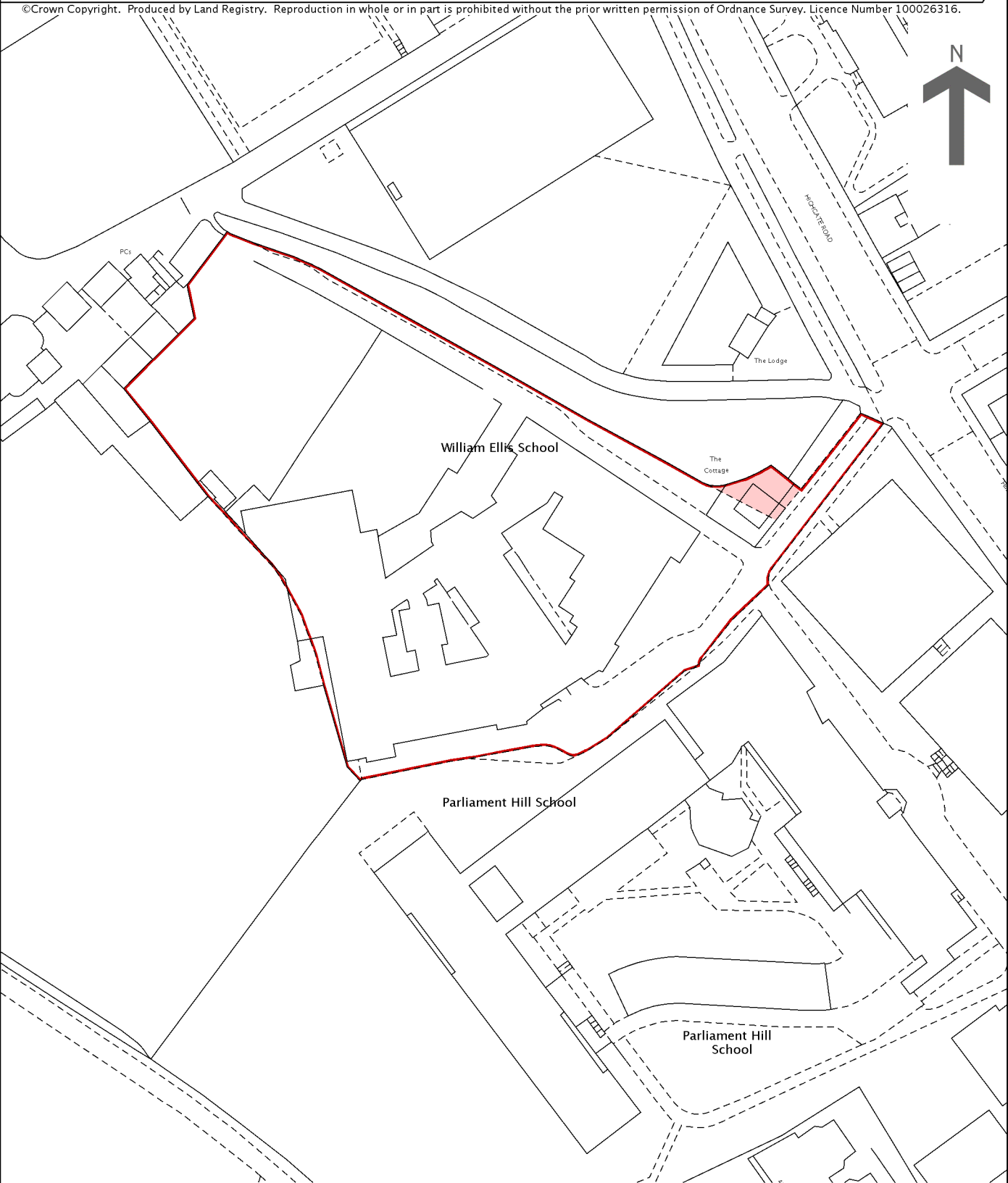
This official copy is issued on 07 March 2017 shows the state of this title plan on 07 March 2017 at 11:15:47. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the Land Registry, Croydon Office .

Land Registry
Official copy of
title plan

Title number **NGL643550**
Ordnance Survey map reference **TQ2886SW**
Scale **1:1250**
Administrative area **Camden**



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From: Sean Gilbreth <sean.gilbreth@dp9.co.uk>
Sent: 03 May 2019 15:24
To: PlanningPolicy
Subject: RE: Draft Dartmouth Park Neighbourhood Plan Consultation
Attachments: DPNF Reps Final v2.pdf

Dear Sir / Madam

Further to the below, please find an updated set of representations, with one minor addition of wording.

Again, I would be grateful if you could please confirm safe receipt of these representations.

Please do not hesitate to get in touch should you have any queries.

With kind regards,

Sean Gilbreth

Senior Planner

direct: 020 7004 1785

mobile: 07795 397 612

e-mail: sean.gilbreth@dp9.co.uk

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 **facsimile:** 020 7004 1790 **website:** www.dp9.co.uk

03 May 2019

Planning Policy

Regeneration and Planning
London Borough of Camden
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London WC1H 9JE

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

By email to planningpolicy@camden.gov.uk

Dear Sir/Madam

DRAFT DARTMOUTH PARK NEIGHBOURHOOD PLAN: SUBMISSION VERSION CONSULTATION

REPRESENTATIONS ON BEHALF OF MURPHY GROUP

These representations are submitted to the London Borough of Camden (LBC) on behalf of our client, Murphy Group, in respect of the Dartmouth Park Neighbourhood Forum's (DPNF) draft Dartmouth Park Neighbourhood Plan (DPNP) consultation.

Background

Murphy Group owns the freehold of a 6.8-hectare site off Highgate Road, Kentish Town (referred to as 'the site', or 'Murphy's Yard'). The site is located a short distance west of Kentish Town Railway Station and Town Centre. It is currently located within a defined Industry Area and is occupied by the Murphy Group as their national headquarters. The site is partially located within the boundaries of the Dartmouth Park Neighbourhood Area.

The site represents a key regeneration opportunity both within the DPNP area and Camden more widely, and Murphy Group are currently exploring options for redevelopment of the site. Murphy Group intends to remain on the site throughout this process and during the operational phase of any redevelopment, continuing their operations which are essential for servicing all of Murphy Group's contracts across London.

Given the longer-term regeneration and mixed-use redevelopment opportunities for the Murphy site in particular proposed by the Neighbourhood Forum, our client welcomes the publication of the latest draft DPNP and the opportunity to comment. Our client would like to make a number of specific comments on certain aspects of the draft document, which are set out below. In the event the Examiner deems a public hearing necessary to test the soundness of the plan, our client wishes to reserve to ability to attend and present their representations.



Representations

Draft Policy SNS1 (Community engagement)

It is not the purpose of the draft Neighbourhood Plan to allocate any development sites. However, the draft Plan has considered a number of parcels of land across the plan area that are considered suitable for development and which the Neighbourhood Forum expects to come forward for development (known as 'Specific Neighbourhood Sites'). If development is proposed on such sites, draft Policy SNS1 seeks that community engagement and compliance with the aims of the plan is sought by applicants. The policy encourages applicants to produce a Development Brief with the community prior to submitting a planning application, as well as engaging in an agreed programme of consultation with the local community. As noted in Figure 9A on page 90, 'Murphy's Yard' is identified as a Specific Neighbourhood Site (SNS), which would be subject to draft Policy SNS1.

Murphy Group supports the principle of active engagement with the DPNF and the wider community as part of the design process prior to any planning application being submitted. Neighbourhood planning is a right for communities introduced through the Localism Act 2011 and is a vital element in the planning process. The consultation period allows local people to express their views on matters which relate to local issues and engagement in this process should always be encouraged. It is the intention of our client that proposals for redevelopment of the site at Murphy's Yard would be robustly consulted upon with the local community, including members of the DPNF, to ensure that the community's views have been taken into consideration.

Murphy's Yard SNS

Regarding the Murphy's Yard SNS specifically, Murphy Group supports the draft Plan's view that the site has the potential to enhance the local area with a sensitively designed and high-quality scheme. The Kentish Town area, and in particular Highgate Road, is well connected by a range of public transport modes, including rail and bus. Murphy's Yard represents a significant land holding in a sustainable location, well suited to a range of development options of an appropriate scale to deliver new homes and/or economic development. The future of this part of Kentish Town, regenerated as a new high-quality development, is strongly supported by the Murphy Group.

The draft Plan specifies that a redevelopment of the site should comprise a mixed-use development with residential, business/employment, retail and community floorspace. Murphy Group is supportive of considering a range of uses which could constitute redevelopment at the site, however, the value of the site's position as an industrial location should not be underestimated. The site has the capacity not only to re-provide the existing industrial uses, but also expand on a mix of other uses, such as residential, office, retail etc. At



this early stage in the proposals for Murphy's Yard, Murphy Group would not wish to rule out any redevelopment option of the site.

The re-provision of employment-led uses would not necessarily exclude the delivery of other types of floorspace, such as residential or community uses. As set out in the draft London Plan at Policy E7 (Industrial intensification, co-location and substitution), the Mayor is supportive of co-locating industrial uses with other uses, provided that the amenity of these more sensitive users is protected, and that the operations of the industrial uses would not be prejudiced as a result.

It is noted in the description of the Murphy's Site SNS that the site has the potential to contribute significantly to Camden's housing and employment targets. The draft Plan states that the site has development capacities of up to 30,000 sqm of employment space, 5,000 sqm of community/retail/other and 500 homes, equating to approximately 125 dwellings per hectare (ha). These figures appear to have been based on information provided in the 'Murphy's Yard Framework Masterplan', prepared by AECOM for the Dartmouth Park Neighbourhood Forum.

Murphy Group's view is that these figures are highly conservative and would not optimise the development potential of the site. Having reviewed AECOM's masterplan document, it is not clear how these development figures were reached, other than through indicative layout and height options. The draft Plan also appears to discount one of the masterplan options presented, which shows the potential for 676 residential units to be delivered, at a density of 169 units/ha. However, even this minimally increased figure would still represent a highly under-developed scheme, which would be contrary to the significant need for housing and employment floorspace set out in the London and Camden Local Plans.

The conservative figures put forward in these masterplan options are largely due to the restrictive building heights proposed, the maximum of which is 9 storeys. AECOM explains that these maximum heights have been determined on the basis of the Kentish Town Neighbourhood Plan Designated View, which as set out in more detail below, is considered by Murphy Group to be unjustifiably restrictive. Murphy Group considers that the heights of the buildings on site could extend beyond 9 stories without having a detrimental impact on the Designated View, and would robustly demonstrate this through detailed townscape and views assessments submitted as part of any planning application at the site. This would therefore allow a greater quantum of development to be brought forward on site, which would be appropriate to its highly accessible location in an urban environment.

The draft Plan notes Camden's developing planning framework for Kentish Town (KTPF), which includes both Murphy's Yard and the Regis Road site to the south of the railway. The draft KTPF seeks comprehensive development of both sites and whilst we acknowledge the aspiration for the holistic regeneration of the area, the delivery of the Murphy site should not be constrained



by progress at the Regis Road site. We recognise that the draft DPNP does not set out such an aspiration for simultaneous delivery of the site, which Murphy Group supports.

At present, pedestrian and cycle access in and around the site is poor. Murphy Group is supportive of the draft Plan's desire to see improved connectivity and permeability across the site between Gordon House Road, Highgate Road and Gospel Oak Station. As the redevelopment proposals for the site are at an early stage in development, exactly how this permeability across the site will be implemented has not yet been decided. However, Murphy Group's initial view is that vehicle access points would be most appropriately located off Highgate Road, with the existing access off Gordon House Road being suitable for pedestrian, cycle and emergency access only. A further pedestrian access point should be provided between the bridges at the north end of the site near Gospel Oak Station.

The emerging redevelopment proposals for the site seek to maintain a vehicular access off Gordon House Road, due to servicing requirements and legal rights of access in the northern section of the site. The design team would seek to explore the possibility of creating a new access on Gordon House Road to the west of the railway bridge, however, if this is not possible, the existing Gordon House Road access would need to be maintained. In any event, it is Murphy Group's genuine intention to realise better connectivity at the site, and understands that in order to deliver substantial public realm enhancements at Murphy's Yard, improved access to and across the site will be a necessity of redevelopment.

The draft Plan encourages redevelopment of Murphy's Yard to incorporate enhancements to local greenness and openness. Murphy Group are supportive of increased greening of the site, which would ultimately assist in delivering the necessary public realm enhancements as part of the site's redevelopment. However, it should be noted that this provision of green and open space should not come at the expense of the ability to deliver a large quantum of floorspace at the site. As part of any redevelopment, Murphy Group would explore the possibility of incorporating this greening as part of any new buildings on site, such as through the inclusion of brown and green roofs and walls, which would be part of a wider sustainability strategy at the site.

The draft Plan states that, should redevelopment of the site go forward, the Forum would support the inclusion of mitigation measures to offset the impact of the development on existing local infrastructure, such as through the provision of new educational or medical facilities, etc. Murphy Group would like to note that, any planning application submitted for the redevelopment of the site would be accompanied by a full Environmental Statement to ensure any impacts are mitigated. Furthermore, a significant Community Infrastructure Levy (CIL) contribution would be secured from the applicant by Camden, which would contribute towards funding infrastructure in the area.

In terms of the other requirements set out by the draft Plan for the Murphy's Yard SNS, such as affordable housing, car parking, external amenity space, etc., any planning application



submitted for a redevelopment of the site will have due regard to the relevant development plan policies and will seek to provide the best design solution for the site, taking account of all constraints and opportunities. The extent to which Murphy Group provides additional infrastructure on site will be subject to the nature and constraints of the final proposals as well as detailed discussions with LBC, the statutory bodies and local community

Building Heights

Absent of immediately neighbouring buildings, the western edge of the site presents itself as an appropriate location for increased development. There is the potential to gradually step up building heights towards the centre of the site, and provide a cluster of taller marker buildings to demarcate the convergence of any future north-south and east-west connections that would connect the site with the wider north London area.

Murphy's Yard does not sit within any protected local views as set out in Figure 2A of the draft Plan. However, as noted in the Murphy's Yard SNS description in the draft Plan, the viewing corridor in the Kentish Town Neighbourhood Plan, from Kentish Town station to Parliament Hill, should be respected in accordance with that plan. Murphy Group recognises the desire for a view towards Parliament Hill from the area adjacent to Kentish Town Underground station. Murphy Group was involved during the consultation process for the Kentish Town Neighbourhood Plan, which defined this protected view and was supported by Murphy Group in principle, although would like to make the following points.

The view from Kentish Town Station towards the Heath cannot be described as of especially good quality, and it is unlikely that the majority of passers-by would take particular note of it. This is largely due to the presence of highways clutter in the foreground and electric gantries running along the rail lines beyond the bridge. However, the trees on Hampstead Heath can be seen clearly beyond all this, terminating the view above the rail bridge parapet.

What is most eye-catching about the view is the large area of grass that is visible in the distance, which is noticeable when sunlight falls on it. For the most part, the grass that is visible is on the slope that rises above the Parliament Hill Fields athletics track. Above this, and beyond an intervening line of trees, a much smaller band of the grassed area around the high point of Parliament Hill itself can be seen. Above this are more trees on the Heath, further to the north, rising to the skyline of the view as seen from here. As can be seen, the KTNF viewing corridor is not centred on the visible area of grass, but is shifted to the right, relative to this grass.

With this in mind, while the presence of a view towards Parliament Hill from Kentish Town Station should be respected, the townscape value of this view is not considered to be especially significant. As such, a significant amount of weight should not be given to this view when weighing it up against the potential for the site to deliver a significant amount of residential or commercial floorspace.

**Draft Policy DC3 (Requirement for good design)**

Murphy Group supports the design principles and criteria which comprise draft Policy DC3. There are examples of inappropriate development in Kentish Town which has left a legacy of poorly designed frontages, which are out of keeping with the local area and have a negative impact on the visual amenity and sense of the area. The draft policy for high-quality, contextually-appropriate design is clearly necessary and consists of the same design parameters which are included within the Camden Local Plan (supported by Camden Planning Guidance 1), and with Kentish Town Conservation Area Appraisal and Management Strategy (2011), Camden Streetscape Design Manual (2005), Town Centres SPG Greater London Authority July 2014, Shaping Neighbourhoods: character and context supplementary planning guidance GLA June 2014, Urban Design Compendium 2 – MADE.

Draft Policy D4 (Heritage assets)

The Murphy Group supports the principle for the improvement and retention of buildings and features in the Kentish Town Area in the 2015 Local List. The site contains buildings which are designated on the Local List (ref:630) (included within the DPNP boundary) as having 'Architectural and Townscape Significance'. Some of these buildings and their features are important elements to the local Kentish Town fabric and history, and Murphy Group would seek to retain these important assets where possible as part of any redevelopment plans. These buildings are described in the Local List as follows;

'Ensemble of large red brick sheds at the corner of Sanderson close. Dating to the late 19th century these were the Kentish Town Locomotive Sheds for the Midland Railway, and sat just to the east of the Tottenham North and South Curves lines in an industrial landscape with other warehouses such as bottling stores at the end of Carkers Lane, and gas works. Rare evidence of the scale of the railway infrastructure in the borough in this period'.

It should be noted however, that parts of these shed buildings suffered a large amount of damage during the Second World War and were subsequently rebuilt. As such, many of the original architectural features and qualities which made them special have been lost. Murphy Group considers therefore that there would be little merit in retaining architectural structures and features of limited or no heritage value, especially if this would prevent a more comprehensive development of the site coming forward, which would provide much-needed housing and commercial floorspace.

***Draft Policy H1 (Meeting housing need), Policy H2 (Affordable housing)***

Murphy Group is supportive of both the draft Neighbourhood Plan and Camden Local Plan's intent to encourage a range of provisions to meet current and future housing needs by advocating for the delivery of a significant amount of housing. The draft Plan states that the existing broad range of tenure and type of housing should be maintained. Murphy Group supports this approach and would seek that a redevelopment of the site includes a variety of housing, in line with the requirements of Camden and the Greater London Authority.

Policy H2 states that the Forum supports the development of affordable housing by requiring all proposals for one or more additional homes to maximise the inclusion of affordable housing, as required by Camden's Local Plan. To this effect, Murphy Group will look to provide the maximum viable amount of affordable housing on site. Precise details regarding the proposed mix and tenure of the housing units are yet to be determined, but these will be subject to detailed discussions with LBC's housing team.

Draft Policy ES3 (Biodiversity)

Murphy Group supports the protection and encouragement of areas of biodiverse habitat and recognises the need to increase the biodiversity of green spaces. There are opportunities to increase and extend the biodiverse habitat along the existing green corridors (highlighted on Figure 7B on page 75), and to strive to provide a green corridor from the centre of the neighbourhood forum area to Parliament Hill and Hampstead Heath.

Concluding Remarks

We trust that the above representations are clear and that they will be considered in the next stage of the DPNP. We also request that we are consulted on any future planning policy documents concerning the area.

If you require any additional information, or would like to discuss this matter further, then please do not hesitate to contact me or my colleagues Alexandra Milne or Sean Gilbreth at this office.

Yours faithfully



DAVID MORRIS
Board Director
DP9 Ltd

From: Smith, Kayley <Kayley.Smith@highwaysengland.co.uk>
Sent: 05 April 2019 16:44
To: PlanningPolicy; Planning SE
Cc: growthandplanning
Subject: RE: #7104 Notice of submission of Dartmouth Park Neighbourhood Plan

Consultation: Dartmouth Park Neighbourhood Plan

Highways England Ref.: #7104

Dear Camden Planning Policy team,

Thank you for your e-mail dated 14 March 2019, inviting Highways England to comment on the above consultation and indicating that a response was required by 3 May 2019.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having examined the Draft Dartmouth Park Neighbourhood Plan, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time.

Thank you again for consulting with Highways England. We look forward to future consultation via our inbox: PlanningSE@highwaysengland.co.uk.

Kind regards,

Kayley Smith

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <https://highwaysengland.co.uk>

Date: 3 May 2019

Contact: Karen Corkery

Direct line: 020 7974 1437

Email: karen.corkery@camden.gov.uk

London Borough of Camden

Supporting Communities Directorate

5 Pancras Square

London

N1C 4AG

Kate Goodman

Principal Planner

Strategic Planning and Implementation Team

London Borough of Camden

5 Pancras Square

London

N1C4AG

Response to the Dartmouth Park Neighbourhood Forum Plan

We welcome the opportunity to comment on the Dartmouth Park Neighbourhood plan. Under Policy ES1, as landowner of Parliament Hill School site and William Ellis School, we object to additional land on the school sites being included as part of the 'other space options'. There are currently construction schemes on both sites to reconfigure the buildings and make improvements to the teaching and learning environment. Some of this development is located within the proposed additional open spaces of value and therefore we do not support the proposal for additional open space on these sites.

Please note that the Trustees of The Birkbeck and William Ellis Schools Trust have a long lease on the William Ellis School site and they have been informed of the proposal and given the opportunity to comment. La Sainte Union School is also included in the proposal for additional other spaces options under Policy ES1 and this is not owned by the London Borough of Camden and therefore the school should be contacted directly.

Yours sincerely



Gavin Haynes

Director of Property Management

From: [REDACTED]
Sent: 24 April 2019 18:30
To: PlanningPolicy
Cc: dartmouthpark@hotmail.com
Subject: Re: Dartmouth park Neighbourhood Plan

Dear Sir or Madam,

I went this morning to Kentish Town Library to peruse a copy of the Dartmouth Park Neighbourhood plan, and having read it wish to make a couple of points, as a local resident, to clarify my concerns about some of the strategy and recommendations in the document.

I live in Chetwynd Road, the through run that residents have been trying to get looked and monitored, without success, for well over thirty years.

I am happy to see that the Neighbourhood Plan recommends a study into the pollution levels and traffic nightmares we currently face in Chetwynd Road: study TS3 and Pollution Measures: DC4 (f)

I was alarmed, but not surprised, to read that up to 6000 cars A DAY use our road as a cut through. I totally understand, and am aware of the fact that pollution levels are 25% above average than those in most of Central London. We are not able to open any of our windows in the front of our properties, denying us the opportunity to get any fresh air into our homes. The noise level of this constant and often aggressive traffic means that it is impossible to sleep at the front of the property, as the frustration of drivers, particularly vans, means they race down the road at all times of the day and night, once they have been able to find a way through the bottleneck of what is in effect a one way street: And Should Be.

I am amazed that there have not been more accidents in our street. Even at 8.00am in the morning my dog and I have been cut up by frustrated drivers on numerous occasions. These drivers seem to have no idea nor consideration that they are driving through a Residential Area, seeing it merely as a cut through to get to the rest of North London **as quickly as possible** . I hope the Neighbourhood Plan is successful in finally encouraging the Council to take this matter seriously, on behalf of their ratepayers, especially in light of the Mayor's highly publicised concerns.

The second matter, which is related, as the report acknowledges, is to do with the somewhat delicate area of further residential developments to the houses in Spencer Rise, which face the back of our garden and our homes in Tudor Mansions.

Tudor Mansions was built in 1899 and each of the five flats has a balcony, allowing us fresh air, views and access to light.

The Neighbourhood Plan notes that any further developments require **special care**..

Over recent years extensions have been allowed to the back of Spencer Road properties. These have already greatly effected the character of the area, in a detrimental way, and most importantly affecting the amenity of us, their very near neighbours. These extensions all have glass walls and windows, generally without either curtains or blinds, allowing for unnecessary views from time to time. Lights (internal and external) are left on **all** night, and our neighbours seem to take no responsibility nor concern over this. They also seem totally unconcerned, or at least unaware of, how their levels of noise affects their near neighbours .

It is therefore with great concern that I read in the Neighbourhood Plan about recommendations for FURTHER applications for LOFT developments in Spenser Rise,. This would further aggravate an already difficult situation. Not only would such further extentions obscure our views and the availability of sky and daylight to our properties... (the reason many of us moved here in the first place,,,,) but would further jeopardise our privacy.

For instance I cannot understand why Dormer Windows are being suggested at the back of these properties, directly looking over our garden and directly into our flats , whilst Dormer Windows at the front, which merely look over the street, are deemed acceptable in the Plan.

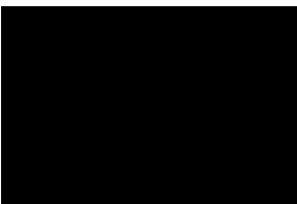
Surely, in such a mixed residential area (primarily in terms of age, which seems to be somewhat overlooked...) the concerns of those of us who have already downsized in recent years, to free up our larger properties, need a voice for our rights and welfare provision as well.

I would like to be notified of the Council's decision in all matters relating to the Neighbourhood Plan, and would wish to participate in a public meeting if one were to be held.

The development of our neighbourhood, which I fear seems to be currently ambushed by people with the financial resources to just build, build, build... (up, out and under)... many of whom don't even live here ...are developing the area simply for financial return.,

I would hope that the Council, in the light of the Neighbourhood Plan's recommendations, would see it primarily as their responsibility to maintain and guarantee the quality of the lives of current residents, who have chosen to see out their days here.

Yours sincerely,



From:



Sent:

27 April 2019 19:53

To:

PlanningPolicy

Subject:

Dartmouth Park Neighbourhood Plan - comment on swifts

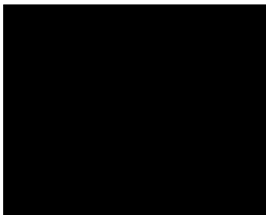
Follow Up Flag:

Follow up

Flag Status:

Flagged

I would like to put in a few words for the swifts that sweep into this area in early May. They bring great pleasure and we are so lucky to have them. They remind us that we need to be aware of the critical loss of bio-diversity and be reminded that there are things we can do in terms of building regulations to make sure that these wonderful birds do not lose all possibilities of nesting.



From: [REDACTED]
Sent: 27 April 2019 13:20
To: Planning <Planning@camden.gov.uk>
Cc: dartmouth@hotmail.com
Subject: Kentish Town Neighbourhood Plan

By December 2019 I will have lived in Tudor Mansions Chetwynd Rd for fifty years.

My concerns for the future of the neighbourhood regard traffic, air quality and excessive development.

I have been through various plans and protests re the traffic in Chetwynd Rd and surrounding areas. The only perceptible improvement has been the traffic humps which at least slow the traffic down.

The air quality has got exponentially worse and the evidence of our senses is confirmed by measurement of pollution levels.

When traffic is queuing up at school times and whenever large vehicles are trying to negotiate a road designed for 19th and early 20th century traffic, (most of the time), the exhaust fumes of idling engines is particularly poisonous.

It is impossible to negotiate the footpath when wheeling a buggy with a toddler walking beside. The vehicles of the new rich have got bigger and bigger and regularly park well over the allowed line. This also makes it difficult for the wheelchair users residents.

Perhaps the Neighbourhood Plan will prompt the council in a total rethink of traffic management in Chetwynd Rd and some of the nearby much quieter streets.

The footpath parking needs to be enforced so that vehicles do not squeeze out pedestrians by parking over the designated line. Has anyone been penalised for this? A major rethink of this policy is needed.

Going hand in hand with the traffic problems are the problems caused by overdevelopment in Spencer Rise and Dartmouth Park Hill.

Over recent years most of the houses in Spencer Rise have had extensions, nearly all with large glass walls. These houses back on to Tudor Mansions and have considerably compromised our privacy.

The residents in Spencer Rise would appear to have little regard for their own privacy as all aspects of lives are conducted in brightly lit rooms with no blinds or curtains. This includes bathrooms and bedrooms.

We are sometimes subjected to views of our neighbours' lives which we would rather not have to witness.

The lighting, including very bright security lights permanently on outside daylight hours, also causes considerable light pollution to our much more modestly lit properties and spoils the amenity of our balconies.

I am concerned that The Neighbourhood Plan is recommending further development of lofts in Spencer Rise. This would further compromise the right of Tudor Mansions' residents to lack of light pollution and noise pollution.

The bigger cars and large extensions and conversions all point to a huge demographic change in the area. Many of the conversions are carried out by owners who live abroad and don't have to suffer the noise and extra traffic generated by their 'improvements'.

We and other retired residents have to endure the noise, dust and extra traffic generated by these extensions.

The larger capacity houses do nothing to ease the housing shortage as they squeeze out families on lower income who used to comprise many of the residents but now could not possibly afford to live in this area.

We and many of our elderly neighbours in Chetwynd Rd have lived here since the seventies and many did jobs which contributed to society; teachers, social workers, hospital workers, street cleaners, postal workers, railway workers and many more. Most of these could not afford to live in the area now.

While we are always grateful for neighbours who have the skills, energy, time and resources to take part in these consultations, I urge the Council to look carefully at The Neighbourhood Plan and consider the wider community when making decisions.

[REDACTED]

From: [REDACTED]
Sent: 03 May 2019 09:52
To: PlanningPolicy
Subject: Comments on DPNF Plan 03/05/19

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planners,

I was involved with the DPNF Plan and support it's Key Issues and Vision.

I am also involved with the DPCAAC, especially the trees, and wholeheartedly support the retention of 'the

neighbourhood's leafy feel, with treasured green and open spaces, and wide tree-lined roads giving a semi-rural or village feel'. I therefore support policy ES2 to promote and increase the number of healthy trees.

I support policy ES2 on solar panels, but only if they are 'visually integrated into roofs, are not visible from the street

and do not project above the plane of the roof'. I do object to large solar panels, black in colour, being sited on the front red-tiled maisonette roof of a 'Homes for Heroes' on the Brookfield Estate.

(Also I agree with [REDACTED] comments on No 32, Laurier Road).

Thank you,
[REDACTED]

From: [REDACTED]
Sent: 29 April 2019 15:35
To: PlanningPolicy
Subject: Feedback on Dartmouth Park Neighbourhood Forum Draft Plan Submission

Follow Up Flag: Follow up
Flag Status: Flagged

To:
Planning Policy
Regeneration & Planning
London Borough of Camden

Dear Sir/Madam,

I have read with interest the Dartmouth Park Neighbourhood Forum Draft Plan Submission and have attended one or two discussion meetings over the last year or two.

I think that overall the document sets out a very sensible and viable plan for the area in which we live.

I have a few specific points which I feel it may be important to highlight:

The volume of Traffic and its impact certainly does need to be reduced.

I firmly support the extended hours of restricted parking which is being introduced in CA U. Other measures to reduce traffic will be welcome.

There is a 20 mph speed limit but at the moment it doesn't seem to be enforced. It would be good to introduce measures to ensure that the speed limit is respected. Personally I have no objection to speed humps, narrow areas, signage and single lane one way streets. Anything that gets people out of cars and onto public transport or cycling/walking has got to be a good thing! Maybe even some cameras would be a good idea.

As we will be encouraged in the near future (when the ULEZ is extended) to trade in our old cars for electric or hybrids, it would be good to start putting in more easily accessible electric charging points.

It is an excellent idea to encourage cycling. Additional cycle lanes and cycle parking would be very helpful. It would also be good to have measures (e.g. CCTV near cycle parks) to discourage theft. Cycle traffic lights at junctions would also be a very good idea.

I noted the map of Green Spaces. It looks as though the Green Space at the Dartmouth Park Hill end of Chester Road has been missed out. I wasn't sure why this wasn't included. I have noted that this space seems to attract a lot of rubbish tipping and I am sure it could do with more maintenance and protection.

I totally agree that any kind of high-rise development has to be forbidden. Its not just the sight lines, the whole area consists of buildings no more that 4 storeys high (or maybe 5 if basements are included!).

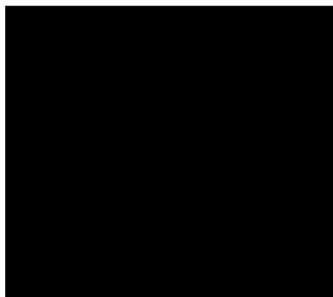
I certainly agree with Policy DC3 that 'Extensions to existing buildings must be subordinate to existing development and in keeping with setting including the relationships to adjoining properties'

However, it was of great concern to see in Policy DC4 that 'small' rear extensions can be permitted. Although the Policy does state that such extensions 'should not harm the amenity of neighbouring properties' I know of more than one case where such extensions have been built which just stick out into a neighbouring back garden like a huge box and have been allowed to proceed despite objections. Loft extensions and single storey side extensions are not usually nearly such a problem so it would be better if the regulations were more strictly enforced for the back garden extensions.

I hope the above is helpful and that you get plenty more feedback.

I will look forward to seeing the final plan.

With best regards



From: Islington Swifts <islingtonswifts@gmail.com>
Sent: 03 May 2019 16:54
To: PlanningPolicy
Cc: mail@swift-conservation.org
Subject: Fwd: Fwd: Notice of submission of Dartmouth Park Neighbourhood Plan

Follow Up Flag: Follow up

Flag Status: Flagged

Please find below our comments with regard to the Dartmouth Park Neighbourhood Plan consultation

Islington Swifts Group are an independent conservation organisation for urban biodiversity that started in Islington, but now has projects across north London.

We have liaised with Swift Conservation (www.swift-conservation.org), the national organisation for swifts who are based in the Borough of Camden, as well as with residents in the Dartmouth Park area, prior to submitting this consultation response.

Swifts are amber listed and House Sparrows are red listed in the UK, following steep declines in their populations; these birds are still found in significant numbers in Dartmouth Park, but local feedback suggests that the numbers seen are declining. Both are very dependent on buildings for their nest sites.

The RSPB Swift Survey database shows nests sites confirmed within the Dartmouth Park area on Chetwynd Road and Laurier Road; there are also several nest sites confirmed close to the boundary of the area in architecturally similar locations (Burghley Road, Oakford Road, Tanza Road, Heath Hurst Road), which suggests that nesting Swifts are under-reported within Dartmouth Park – this is often the case as Swifts are elusive around their breeding sites. Residents may see Swifts overhead but believe they are nesting in green areas rather than in nearby urban locations.

Further declines are likely due to renovations and extensions destroying nest sites; note that protecting Swifts and Bats does not conflict with improved energy-efficiency, as they usually remain outside the insulated layer.

Biodiversity was highlighted as important during the Dartmouth Park consultation but currently section Policy ES3 Biodiversity only considers trees and green spaces and excludes buildings; Bats are also buildings-dependent species that are overlooked by the plan.

Key ways that Swifts, Sparrows and Bats could be helped are:

- □ Their presence within the area and endangered status highlighted in the Plan section E3 Biodiversity, to increase awareness;

- □ Requirement of ecological surveys for planning permission where nest sites are known or strongly suspected;
- □□□ Encourage wildlife-friendly refurbishment, so access to the nest sites is retained (may be in a more controlled manner, e.g. so that birds cannot enter the loft space);
- □ Appropriate integrated measures in new-build developments and major refurbishments and extensions: e.g. integrated nesting bricks for Swifts and/ or Sparrows, and/ or roosting bricks for Bats.

Islington Swifts Group

From: [REDACTED]
Sent: 02 May 2019 19:38
To: PlanningPolicy
Cc: [REDACTED]
Subject: Dartmouth Park Neighbourhood Plan Consultation

Follow Up Flag: Follow up

Flag Status: Flagged

Please find my response to this consultation:

I understand that the biodiversity section ES3 in the Dartmouth Park Neighbourhood Plan on which you are consulting omits mention of birds and bats in the crucial areas of planning and building control.

I am indebted to Swift Conservation for the following information, which I wholeheartedly endorse:

The RSPB Swift Survey database shows nests sites confirmed within the Dartmouth Park area on Chetwynd Road and Laurier Road; there are also several nest sites confirmed close to the boundary of the area in architecturally similar locations (Burghley Road, Oakford Road, Tanza Road, Heath Hurst Road), which suggests that nesting Swifts are under-reported within Dartmouth Park – this is often the case as Swifts are elusive around their breeding sites. Residents may see Swifts overhead but believe they are nesting in green areas rather than in nearby urban locations.

Further declines are likely due to renovations and extensions destroying nest sites; note that protecting Swifts and Bats does not conflict with improved energy-efficiency, as they usually remain outside the insulated layer.

Biodiversity was highlighted as important during the Dartmouth Park consultation but currently section Policy ES3 Biodiversity only considers trees and green spaces and excludes buildings; Bats are also buildings-dependent species that are overlooked by the plan.

Key ways that Swifts, Sparrows and Bats could be helped are:

- Their presence within the area and endangered status highlighted in the Plan section E3 Biodiversity, to increase awareness;
- Requirement of ecological surveys for planning permission where nest sites are known or strongly suspected;
- Encourage wildlife-friendly refurbishment, so access to the nest sites is retained (may be in a more controlled manner, e.g. so that birds cannot enter the loft space);
- Appropriate integrated measures in new-build developments and major refurbishments and extensions: e.g. integrated nesting bricks for Swifts and/ or Sparrows, and/ or roosting bricks for Bats.

Today our first Dartmouth Park swifts have arrived from Africa to breed. Swifts have nested under the eaves of our house in Chetwynd Road for at least as long as we have been here – some 16 years - bringing their exuberant sights and sounds of summer – but we have observed fewer of them return to the area every year. Most people are unaware how easy it is to attract, or to maintain – nesting sites but equally how easy to destroy them unwittingly. It is vital that planning guidance documents increase awareness and help reverse swifts' decline.



From:

[REDACTED]

Sent:

03 May 2019 12:29

To:

PlanningPolicy

Cc:

[REDACTED]

Subject:

Draft Dartmouth Park Neighbourhood

Follow Up Flag:

Follow up

Flag Status:

Flagged

Dear Sirs

With regard to the above Plan, we have the following comments to make specifically about Swains Lane issues:

As residents our concerns are principally around the potential increase in activity on the lane when the building development by Noble House at the Parliament Fields end is complete and occupied. The increased use of Hampstead Heath each year and the concomitant increase in activity is also a concern.

Residents should be protected from the impact of traffic, parking and possible late evening noise as much as possible and this should be included in the Plan. This is, of course primarily a residential street used by local people and many children on their way to the local schools.

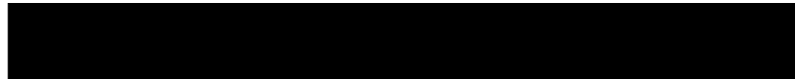
Our additional concern is that any developments should be of good modern design of appropriate scale & should not resort to pastiche solutions.

Thank you for this opportunity to comment

[REDACTED]

[REDACTED]

From:



Sent:

03 May 2019 10:58

To:

PlanningPolicy

Subject:

Dartmouth Park Neighbourhood Plan

Follow Up Flag:

Follow up

Flag Status:

Flagged

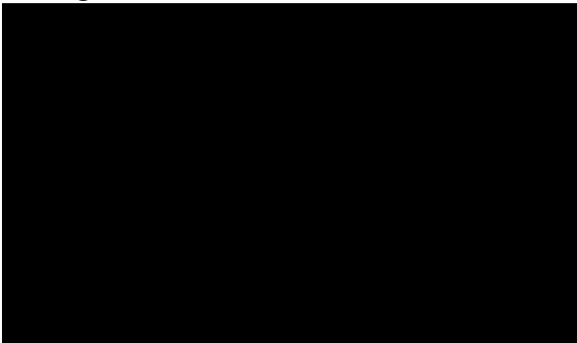
I am writing in full support of the plan which I think has been diligently produced in cooperation with local residents and with exemplary efforts to consult. It represents a very fair balance of sometimes conflicting points of view and meets the requirements of the Basic Conditions.

If there is a hearing I would like to speak in favour.

Please inform me as to the Council's final decision.

--

Regards



From: [REDACTED]
Sent: 28 April 2019 11:33
To: PlanningPolicy
Subject: Draft Dartmouth Park Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Comments on Draft Dartmouth Park Neighbourhood Plan

This is a well-researched and well set out Plan. However, below are a number of comments and suggestions

1. In Chapter 4 on Housing (page 33), there is reference to Houses for a range of residents from young professionals etc. It might be more appropriate to change this to **'young persons embarking on a career'**. Not all young people looking for housing will be professionals.

2. Affordable Housing: It is clear that there is a real need for affordable housing for those with low incomes or disabilities. Dartmouth Park has a significant stock of social housing. **The Plan should suggest a review to seek a more effective use of the stock of social housing.** It is very clear that there is widespread abuse, as well as properties occupied by those who could afford to pay higher rents or move into the private rented sector. This could release significant numbers of flats for those in real need.

3. Policy CM1. Community Facilities. It is unfortunate that the Camden policy appears to be drafted to allow the Council to remove community facilities under a wide range of circumstances, such as being deemed uneconomic. **The Plan should indicate that it regards the maintenance and improvement of Community facilities, especially for the younger generation, as a high priority.** It is right to call for the reconsideration of the Highgate Community Centre re-development project.

4. Public Toilet: There are references to this proposal in Projects (page 47), on page 109 and in Appendix 5. It would be beneficial to be accurate and consistent in the terminology used. Suggested wording would be: **"Public toilet close to the bus terminus at the junction of Swain's Lane with Highgate Road"**.

5. Fig 6a on Page 49. The purple box relating to Swain's Lane should extend to the junction with Hillway. Currently it seems to end at the junction with Church Walk.

6. Reference to Bus route C2, should have in brackets **(now 88)**

7. On Page 51, 'desire' should be replaced by 'need' .There has been a noticeable increase in traffic along Swain's Lane, both vehicles and cycles, especially since the end of the Easter break. The opening of the retail units in the NHP will make this even more of a problem

8 In section 8.2 on page 79, Swain's Lane/Chester road might well be included, not least because of the location of Brookfield Primary and the Konstam Nursery, as well as the NHP development. It would be useful to have a traffic count. **Suggest (especially Chetwynd Road and Swain's Lane/Chester road) during peak times.**

9. Pages 83-87 make reference to **dropped kerbs**. Does it need to be made clear that this will not impact on dropped kerbs for disabled access?

10. Policy TS2 Cycling Improvements. (page 86). Much is made of the needs to improve facilities for cyclists. However, given the speed at which cyclists on training runs speed down Highgate West Hill and sweep around the corner into Swain's Lane, there must be a question over whether residential streets, with potentially busy shopping centres, are appropriate for road racing training runs

11. Chapter 10. The table in this Chapter indicates organisations which should be involved in monitoring certain policies within the Plan. Clearly some further thought needs to be given to the roles of the DPNF and the DPCAAC. The DPCAAC does have statutory powers/obligations, which would seem to overlap with those proposed for the DPNF.



From: [REDACTED]

Sent: 28 April 2019 16:07

To: PlanningPolicy

Cc: [REDACTED]

Subject: Dartmouth Park Neighbourhood Plan comments [REDACTED]

Follow Up Flag: Follow up

Flag Status: Flagged

Dear Madam/Sir,

My comments on the above document are as follows:

Generally I support this document and the hard work we have put into it.

The document needs to be properly edited to provide a workable structure. Currently the Clauses and sub-clauses do not flow and cause confusion. This is evidenced by me having to refer to page numbers rather than clauses.


1. I strongly object to the inclusion of the four examples on page 26 under policy DC3. In no way do they reflect the current architecture of Dartmouth Park or any we would want in future. They would fit in well in Hemel Hempstead. I think the new Swains Lane development may qualify as good design once it is uncovered. The recent extension of 32 Laurier Road is an example of what we don't want. The additions look like containers dumped on the roof. Totally out of character with this Victorian street.
2. The example on page 30 of the back of a house in Chetwynd Road shows the selfish design that creates light pollution for the neighbours.
3. The photo on page 54 should be replaced by a recent one; the two shops on the corner of Wesleyan Place have now been renovated.
4. Page 70 the map should include the recent redevelopment of William Ellis and Parliament Hill schools which has opened up a green corridor up Highgate Road to the entrance to the Heath. The two different greens on this map should be contrasting as you currently cannot distinguish between the two. Hampstead Heath also needs to be shown as green open space. Possibly hashed green.
5. The picture of the C2 bus on page 82 should be replaced by a photo of an 88 in the same position.
6. 9.4.4 ASF Garage, Caption: "ASF Garage to the right in the photograph" (has this now been approved? If so maybe all references to this should be removed)
7. Page 130 under project 2 add to the text "It should be noted that it is currently the policy of the City of London not to expand cycle routes on Hampstead Heath however this policy is reviewed regularly"
8. Page 134. Replace the last two sentences with: "In addition, on the Gospel Oak to Barking line, the two car diesel trains were replaced with four car electric trains on completion of the

electrification of the line in early 2019. All these changes have placed additional pressure on the single entrance to the station.”

I trust the independent examiner will take these comments into account.

Best regards

Nick Bradfield

From: 
Sent: 06 May 2019 23:13
To: PlanningPolicy
Subject: Dartmouth Park Neighbourhood Plan

Follow Up Flag: Follow up

Flag Status: Flagged

Dartmouth Park Neighbourhood Plan

My comments on above plan are set out below:

Fig 2A. Page 13 Item 7

This should be identified as York Rise / Chetwynd Road Neighbourhood Centre as it appears elsewhere in this document, just York Rise is incorrect.

It is also shown in the WRONG LOCATION. This error is repeated in Fig 6A

Page 15. 12th line from top

“preserve or enhance” should read preserve and enhance

Page 29 Policy DC4 (b) amenity of neighbours can be equally harmed by light pollution - this should be included in this point. See Camden’s Local Plan, Protecting Amenity Policy A1(g) 6.6. Artificial lighting levels.

Page 31 Photo Roof extension York Rise

Is it supposed to be an example of a good or bad roof extension? At planning application stage it was objected to by both the DPCAAC and Chetwynd and Twisden Roads RA. The glass balustrade is no longer visible, it is entirely obscured by solid bamboo fencing; it should be shown in its present state giving a true picture of the unforeseen consequences of planning decisions.

Page 35 Policy H1 (b) Meeting housing needs

“taking a sympathetic approach” for extensions suggests that a planning decision should take into consideration the circumstances of the applicant which should not be a consideration. Planning applications should be decided in line with Camden’s local development plan and the DPCA Appraisal.

See also page 36 H1 (b) What often happens is as soon as a roof extension is allowed this increases the value of the house and the owner sells on. Again another small un-enlarged house has been lost to the housing stock.

Page 47. 8 lines down from top

Add “and Chetwynd Road” to “York Rise”. Chetwynd Road is part of this shopping hub and has equally bad problems with rubbish and recycling especially at the fish restaurant at no 56.

Page 52 6.4.2 York Rise / Chetwynd Road

Introduction. Is it correct to give the name of a shop eg “Truffles” - this document will be in force for 15 years when “Truffles” at no 33 may no longer exist.

Other shops/restaurants are not named so this is inconsistent. If ‘Truffles’ is named so they should be.

Page 53 Opportunities

“Opportunity for the public realm of York Rise to be greatly improved perhaps by widening the pavements and changing the flow of traffic to one-way”

Chetwynd Road is equally part of this neighbourhood centre. Making York Rise into a one-way street should not take precedence over the need to tackle the volume of through traffic in Chetwynd Road and which it would forestall. It has been made project no 7 and it is vital this is

combined with the Chetwynd Road study project no 15. There are ongoing discussions about ways to mitigate traffic at rush hours and timed restrictions have been recently considered at the junction of Dartmouth Park Hill and Chetwynd Road. However Dartmouth Park Hill is on the boundary with Islington whose traffic planners have not agreed to this and Camden is looking at other options. One possible solution could be to move the timed restrictions down to the York Rise/Chetwynd Road junction or further. This would be an opportunity to extend the public realm (project 7) and benefit from combined funding. There should be no premature changes in road use until a scheme for the whole junction is agreed, this caveat should be incorporated into the paragraph.

Page 63. Policy CE5 (a)

Include the post shop at no 58 Chetwynd Road in the list, which has historic merit similar to no 33 York Rise.

Page 83 Policy TS1 Safety and accessibility for pedestrians and cyclists

The unacceptable situation with the footway in Chetwynd Road, especially in the more narrow east section (see attached photos) has been the “elephant in the room” in this plan. Due to lack of enforcement cars have encroached more and more onto the footpath, ignoring the designated white lines for parking. There is barely enough room for a wheelchair to pass (as a wheelchair user myself I am frequently forced to go on the road to get round parked cars), for mothers with pushchairs and where pedestrians have to walk in single file. Clearly there is conflict between cars parking within the parking strip and being damaged by wide vehicles.

In the early days of consultation it was probable people concentrated merely on the traffic flows.

Later when when the company ‘made.good’ undertook further consultation in the area, Chetwynd Road was designated by the Forum as “lowest priority for engagement” (page 58 Consultations Appendix 7) and the Chetwynd and Twisden Roads’ RA was not consulted. Although not a planning matter, the state of the restricted footway in Chetwynd Road should have been raised as a particular issue in the area as were other

footpaths highlighted in this consultation.





Fig 9A Map of specific neighbourhood Sites Page 90

4. ASF Garage. The new building, whose planning application has recently been approved for the site, is set back from Highgate Road with new public space in front which would be informative to show.

Consultations Appendix 7

Page 25 Comment 35. Response should read DC3(h) instead of DC4(h)

Regards



From: [REDACTED]
Sent: 03 May 2019 21:58
To: PlanningPolicy
Subject: Comments on Draft Dartmouth Park Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Please find the below comments on the Draft Dartmouth Park Neighbourhood Plan comments :

Policy CM1.Community Facilities.

The policy appears to be drafted to allow the Council to remove community facilities under a wide range of circumstances, such as being deemed uneconomic. The Plan should indicate that it regards the maintenance and improvement of Community facilities, especially for the younger generation, as a high priority. It is right to call for the reconsideration of the Highgate Community Centre re-development project

Chapter 6

6.4.1. High street :

In keeping with the overall objectives of the Plan, Neighbourhood Centres should be seen as primarily servicing the local community rather than attracting customers from the local High streets and shopping centres. It would be important for the Plan to reflect this by ensuring that the hours of operation of the retail units reflect the residential nature of their location.

Chapter 8 & Project 2 Cycling Improvements :

Whilst improving facilities for cyclists is welcome there is a different issue regards the high number of cyclists on training runs, particularly at weekends, who come down Highgate West Hill and into Swain's Lane at speed and a question over whether residential streets are appropriate for road racing training runs. The option for traffic calming and pedestrian crossings to be added in Swain's Lane and at the bottom of Highgate West Hill could potentially factor in better managing these scenario's.

Regards

[REDACTED]

From: [REDACTED]
Sent: 16 March 2019 19:52
To: PlanningPolicy; [REDACTED]
Subject: Dartmouth Park Neighbourhood Plan Consultation

Follow Up Flag: Follow up

Flag Status: Flagged

Dear Sir/Madam

I am writing in response to the consultation on the Dartmouth Park Neighbourhood Plan to say that in my view it is an exceptionally thorough and well-conceived document, and I endorse it wholeheartedly. I only wish the plan had been in place when the Bull & Last planning application was submitted because that application, approved without even going to the Planning Committee despite extensive objections from local residents, comprehensively violates pretty much all the relevant recommendations in the Plan. But that is just one aspect of the Plan that, if Camden takes it on board, will do much to sustain the quality of life of local residents and help local businesses to thrive.

Yours faithfully

[REDACTED]

From: [REDACTED]
Sent: 02 May 2019 19:36
To: PlanningPolicy
Cc: [REDACTED]
Subject: Dartmouth Park Neighbourhood Plan Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Please find my response to this consultation:

I understand that the biodiversity section ES3 in the Dartmouth Park Neighbourhood Plan on which you are consulting omits mention of birds and bats in the crucial areas of planning and building control.

I am indebted to Swift Conservation for the following information, which I wholeheartedly endorse:

The RSPB Swift Survey database shows nests sites confirmed within the Dartmouth Park area on Chetwynd Road and Laurier Road; there are also several nest sites confirmed close to the boundary of the area in architecturally similar locations (Burghley Road, Oakford Road, Tanza Road, Heath Hurst Road), which suggests that nesting Swifts are under-reported within Dartmouth Park – this is often the case as Swifts are elusive around their breeding sites. Residents may see Swifts overhead but believe they are nesting in green areas rather than in nearby urban locations.

Further declines are likely due to renovations and extensions destroying nest sites; note that protecting Swifts and Bats does not conflict with improved energy-efficiency, as they usually remain outside the insulated layer.

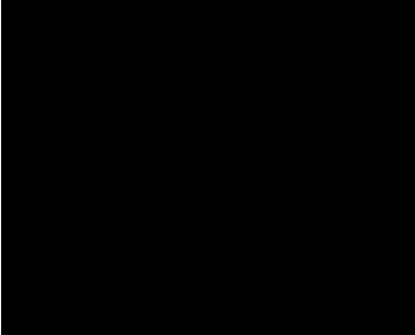
Biodiversity was highlighted as important during the Dartmouth Park consultation but currently section Policy ES3 Biodiversity only considers trees and green spaces and excludes buildings; Bats are also buildings-dependent species that are overlooked by the plan.

Key ways that Swifts, Sparrows and Bats could be helped are:

- Their presence within the area and endangered status highlighted in the Plan section E3 Biodiversity, to increase awareness;
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Today our first Dartmouth Park swifts have arrived from Africa to breed. Swifts have nested under the eaves of our house in Chetwynd Road for at least as long as we

have been here – some 16 years - bringing their exuberant sights and sounds of summer – but we have observed fewer of them return to the area every year. Most people are unaware how easy it is to attract, or to maintain – nesting sites but equally how easy to destroy them unwittingly. It is vital that planning guidance documents increase awareness and help reverse swifts' decline.





May 2019

DARTMOUTH PARK NEIGHBOURHOOD PLAN – JANUARY 2019

Comments

GENERAL:

Consultation:

Not being on-line it has been difficult to keep abreast with the evolving Plan as information newsletters it says were uploaded on web sites, social media, with information via emails. Were other residents also disenfranchised by this? Current Camden public consultation notices only gave a website address.

A hard copy of the Plan was placed at the Highgate Library and another at Truffles Delicatessen in York Rise. The latter is not a public space and not a location conducive to perusing documents. Both are located in the Highgate Ward, while the DPNP boundary includes an area in the Kentish Town Ward. A hard copy was later usefully placed by the Council in the Kentish Town library.

I note no Councillors from the Kentish Town Ward are shown to have been involved.

BASIC CONDITIONS STATEMENT

- 1.7 States: DPNF confirms that this neighbourhood plan: "relates only to the designated Area within the Highgate Ward and to no other Neighbourhood Areas; ..."
Is this a mistake? The boundary shown includes an area in the south which is in the Kentish Town Ward. Ie the lower Murphy's Yard area and area between Sanderson's Close and Carker's Lane.

DARTMOUTH PARK NEIGHBOURHOOD FORUM – NEIGHBOURHOOD PLAN

General comments:

The DPNF's footprint covers areas in two Wards:
The Highgate Ward and Kentish Town Ward.

These political ward boundaries do not reflect the way the community refers to itself as a neighbourhood. (It is likely that with forthcoming Ward boundary changes these boundaries will change again.)

As a community it relates within the DPNF boundary to two distinctly different residential character areas:

- north of the Barking Railway Line known as 'Dartmouth Park'
- south of the Barking Railway Line known as 'Kentish Town'.

The text throughout the Plan invariably refers to the whole neighbourhood area as being 'Dartmouth Park' as 'the neighbourhood'. There should be consistency throughout the Plan and because of the different character areas it may be more appropriate to refer to the whole area as the 'Neighbourhood Area', or "Our Area", or "Our Community", with reference to Dartmouth Park only when talking about the actual physical core area. Or perhaps define further sub-neighbourhoods of Dartmouth Park eg. Highgate New Town.

Residents consider themselves living in these main different community areas. While at the DPNF's southern border where it abuts the Kentish Town Neighbourhood Forum area at Carker's Lane the built areas have a near identical visual character.

From the Foreword throughout the document the 'Dartmouth Park' name use frequently confuses, perhaps this could be looked into.

CHAPTER 1: INTRODUCTION

1.5 The Neighbourhood Area

Fig 1A does not show the blip that includes the whole of the footbridge at Churchill Road, as is the case in Fig A3.1 Needs checking against KTNP boundary.

Note: *Boundary of maps to be consistent throughout. (See also 2.5 Fig 2A green corridors below)*

1.6 **Chapter 9:** ASF Garage Site, planning consent was granted.

Omit all references to it including section in Chapter 9, as the land abutting Highgate Road will revert to a green strip, with terrace of five low level housing units along College Lane. (**photo 1** shows the petrol station forecourt canopy that will now be removed.)

CHAPTER 2: VISION AND OBJECTIVE

Page 8

para three

There should be a description of the areas topography in rising in the east to the Hampstead and Highgate Ridge, at Dartmouth Park Hill.

It should be made clear that this is significant as it is why our area's roofscape is such a significant component to the character of our neighbourhood's built up character. As has been referred to in Appeal decisions.

To be consistent in area descriptions change wording of neighbours: "Junction Road area of Islington" to: Upper Holloway area of Islington.

para ? Chapter 2

or Chapter 3

I could not find an assessment of the neighbourhood after dark, or reference to a walkabout for the purpose to assessing this. Our area's characteristic darkness is mentioned in the Dartmouth Park CA Appraisal. This darkness flows from our setting on the Fringes of Hampstead Heath to the east, the Highgate Cemetery, and Waterloo Park on the rising Ridge to the north and the green corridor/canyon of the railway lines to the south, the expanse of the green lung along Highgate Road with the Dartmouth Park area nestled against the Hampstead and Highgate Ridge on the east. At the latter political boundary Councils believe their world/responsibility ends, but at Dartmouth Park Hill there is a further dark area in the abutting open spaces of the Reservoirs and the "Dartmouth Park" (an actual 'park') in Islington(LB) This special setting within the Borough is clear as indicated on the Camden Local Plan Policy A2 Open Spaces map 2 (pg 199). This characteristic character after dark with its green corridors is important to protect for preserving the abundance of wildlife . It should be grounds for a special policy to restrict the use of artificial lighting levels above that of the Camden Local Plan standard policy which protects Local Amenity from light pollution, generated often by the trend for garden lighting, expanses of glass in development and infill extensions. Owners of Neighbourhood centre units often seek to overlight

their fascia units with bright trough lighting at too high lux levels. There should be extra control to retain appropriately modest lux levels. Pressure for internally illuminated advertising and overlit window displays. Note eg the current internal illumination of the advert at C11 southbound stop at St Alban's Road is disallowed under its planning consent. When local signage is proposed under Projects this again could introduce internally illuminated column posts.

For the purpose of Designing-out-Crime lighting installations are often over-illuminated contrary to expert advice of subtle level lighting.

This extra protection re artificial lighting levels could perhaps also be incorporated in the new development of the Murphy's land as it flows into the Heath at Gospel Oak.

para four The 19th century then completely transformed the rest of the area .. Add: following the building of the local railway lines and underground stations. Additionally, WWII bombsites introduced new infill opportunities.

page 9

para one

For the 15 year life span of this Plan the figures given (2011) may rapidly be outdated and most likely are already as there is a noticeable increase in private rented accommodation, both flats and houses.

Also, in this section include the mention of daytime the population of approx. 3000 schoolchildren.

para three "To this can be added ... omit: ~~the very recent~~ Chester Balmore..." (2000s ?)

2.2

Issues and Opportunities

Add: re characteristic darkness and resisting artificial light pollution as part of the sense of place.

2.4

Our Objectives

The following... achieve our Vision for Dartmouth Park (again an example of the use of "Dartmouth Park" for the whole area – why not Vision for the Neighbourhood Area?)

Design and Character

Add: reference to its character after dark (a significant contribution to its semi-rural feel - and different from other areas in the Borough

Page 13

Fig 2A Spacial Policies

DC1 The viewing corridors omit a much-loved long view to the BT tower from Chetwynd Road (also glimpsed from inner corner west Twisden Road) standing on pavement at the building line of the Coach House/Grove End House and from Grove End south of Chetwynd Road. This view is particularly clear when trees not in leaf, while at all times after dark the tower is seen as a distant landmark beacon. (**photo 2**) This viewing corridor south runs directly across the Murphy's Yard Site within the DPNP area, Future development heights could block this view. It should be protected. Camden's designated view from the ridge by Kenwood House Nursery also runs across the DPNF footprint.

CE1 neighbourhood centres shows the Chetwynd Road/York Rise centre in the wrong location.

Note: I can see no reference to the business centre of Gordon House Road with those along Highgate Road south of Sanderson's Close (include A3 Use Class), and the garages/coachworks at the railway line at Highgate Road. Should these not be included?.

CE2 intensification of neighbourhood centres (using upper floors) a very worthwhile policy, but I cannot see where this would apply in the DPNF area.

ES1 Local green spaces.

Consistency: The York Rise Estate areas are shown green, but Churchill Road Green is not. Most importantly the lowest Grove Terrace (listed) Square is not marked but incorrectly outlined in blue as the 'ASF Garage Site'. This should be corrected to 'green' in line with Camden's Policies Map No 57 Grove Terrace Squares. (photo 1 shows this very important view northbound at the point where one enters from under the railway viaduct into Dartmouth Park the mature trees and open space of the Grove Terrace Squares unfolding. The ASF garage forecourt canopy soon to disappear as construction starts for development at the rear along College Lane, its frontage to Highgate Road returning to a green strip.

Green corridors

Maps:

It should be noted that the Dartmouth Park Conservation Area boundary runs south (east of Highgate Road) to the centre of the upper (Barking) railway line, and thus includes the northern green corridor strip. In terms of the DPNP could this not also include this strip?

SNS1 Specific Neighbourhood Sites

Remove the ASF Site as planning consent granted (this Site was incorrectly located on the map.)

Projects: *These comments should also relate to the Project Sections.*

7 Improve public realm in neighbourhood centre.

This is marked in the wrong location in York Rise. Additionally, Chetwynd Road and York Rise are one neighbourhood centre and improvements to the public realm should cover its entire area footprint.

School run

Until one takes an origin and destination survey, as used to be done in Camden, one cannot make a claim that this is the only, or 'major', school run route through the area, nor that it originates as shown at Dartmouth Park Hill. Many local Dartmouth Park vehicles from roads throughout the centre of our area filter into west Chetwynd Road at its junction with York Rise so that they get a quicker route into Gordon House Road. I object to the full length of this road being marked as a school run traffic route until full evidence is available of how these flows occur.

Chetwynd Road study

The general volume of rat running should be curtailed, which is why it is imperative to treat its junction as part of the public realm improvements for this neighbourhood centre as an integral study.

CHAPTER 3; DESIGN AND CHARACTER

3.1

Our Vision for the Design and Character of the Neighbourhood

Add: characteristic darkness/artificial light levels etc as mentioned above.

Change: Our Neighbourhood Forum'sbut enhanced"; and that Dartmouth Park - the Area ... giving a semi-rural or village feel.

page 15

bullet point three:

Change: ~~create to~~ continue individuality through ...variety architectural styles. This neighbourhood at the designation of its Dartmouth Park CA took great pride in presenting such excellence in diverse historic and contemporary design, the continuation of over 200 years of innovation. The neighbourhood has long been earmarked as an excellent educational study area for architecture, planning and urban design students, with its early land development to its rich development of centuries of excellent architectural design.

3.2 Community Engagement

para two "As the area already has a mix of architectural styles, new styles which are 'in keeping with the area' should be encouraged."

This is a strange statement, as the whole approach has always been one of embracing good contemporary designs in appropriate locations.

page 16
para one

offices and workshops are not mainly in the south of the area, as there are substantial number in the complex at Gordon House Road.

para two

some sections have become repetitive, but here again characteristic darkness an important element.

3.3 Fig 3A

This boundary shows the Churchill Road footbridge blip included.

Council open space should include Churchill Road green.

A play space at the York Rise Estate is not marked.

Belt of mature large street trees in Twisden Road are not marked also those in Glenhurst Avenue and east Churchill Road need including.

page 19
para one

Change: "Another 7 buildings and features are on Camden's Local List" This should read nine. Seven in the Highgate Ward and Two in the Kentish Town Ward area of DPNF boundary.

para two

Omit: "~~Contemporary 21th century design can be part of the change, but must always respond carefully to the setting of buildings and spaces within which it sits.~~"

Contextually fitting, high quality contemporary design has always been welcomed in this area for the many decades I have lived here. It is the fundamental principle too of the Dartmouth Park Conservation Area principle. Successes blend in gracefully, such as the Twisden Works conversion to offices, the infill houses on York Rise 2/2A, 4; the Lighthouse in York Rise which cleverly filled a gap with the development wrapping itself around No 69 Chetwynd Road, Dartmouth Park Hill Nos 81/81A housing.

3.4 Policy DC1 Enhancing the sense of place

(a) The view of Chetwynd Road across the Murphy site (**photo 2**) should be included in Appendix 1 as particularly when trees are not in leaf this is a delightful long view.

The opening green view north and east on Highgate Road (**photo 1**) this is really the entrance into the heart of Dartmouth Park from the south.

(b) Add: policy re light pollution (the harmful negative impact of Haddo House caused by inappropriate re-lamping, has damaged the after dark design intention of this handsome building, and that of the wider character of the dark green corridor). Light pollution is a regularly recurring problem as excessive glazing used in extensions in areas of our dense townscape and trend for gardens to be illuminated is most harmful to neighbour's amenity and damaging to wildlife protection.

(c) I strongly support this. The recent Chester/Balmore development is a prime example of inappropriate over-massing. The bulk has introduced a harmful visual impact on the streetscape setting, the library and the Whittington Estate along Raydon Street.

Page 21

Projects: Whilst I agree with the greening of the north western access to York Rise Estate where lost trees have not been replaced in the past, there was mention of a new path link with Denyer House. For security reasons such initiative should on no account become a viable project.

3.4

Policy DC2 Heritage assets

(a) Planning legal terminology was changed to state to "preserve and enhance" (no longer to 'preserve or enhance'). This wording change has been crucial at Appeals and in planning applications and should be corrected throughout this document.

(d) "... reinstate historic building details (eg finials, reinstate pre-CA inappropriate replacement fenestration to original etc), as well as street furniture..."

Removing all excess carriageway lining to minimum permitted in conservation areas under the National Highway Traffic Regulations. In Highgate Road excess lining has created a visual divide between east and west. (Traffic police are not obliged to enforce speeding on roads which psychologically look like a fast road.)

page 23

DC2(c) Note: para two refers to 7 buildings as assets this should be 9 as there are two in the Kentish Town Ward section of the DPNP footprint.

page 24

para one: correct reference to "preserve-~~or~~ and enhance"

3.4

Policy DC3 Requirement for good design

page 26

shows four photographic examples.

St Anne's Close, 24A York Rise, 22-32 Winscombe Street are excellent examples.

However, the 7 Glenhurst Avenue extension fails to successfully compliment, or respect the integrity of the original 1960s Haddo House Estate design. It fails to successfully relate to the host building Wheatley located at right angles. This corner aspect is viewed from the public realm. The stated set back, as per its Appeal consent, appears not to have materialized and the unit visually fails to complement the rhythm of the very attractive estate design. It is not subservient to the adjacent terrace. The high timber boundary fence visually jars in the streetscape and truncates the flow of the terrace's forecourt treatment thereby drawing attention to the extension. **(photo 3)** After dark the internal illumination also overwhelms the visual balance with its neighbours.

In my view this example should be removed.

Other example could be 81/81A Dartmouth Park Hill **(photo 4)** or 4 York Rise **(photos 5/6)**, the Lighthouse in York Rise, or an earlier end of terrace side extension such as at 30 Laurier Road.

(g) Adequate storage for refuse and recycling could not be stressed enough. At all times these should be kept within the curtilage of the premises. It is imperative that such spaces are clearly annotated on development proposal plans as "refuse and recycling" storage, so that violations by the placing of such items on pavements can be enforced against. This is most important for A3 and A1 commercial units where pressure is often for densification of eg seating through internal layout changes at the loss of such storage spaces. At all times (other than on day of collections) storage items should be kept within the curtilage of properties. With the increase of absent landlords in properties in this area this is an ongoing problem.

(h) Shopfronts should retain transparency. The fixing of opaque film is not permitted and requires planning consent. Shopkeepers use this to provide

additional 'wall' space. The premises at 155-157 Highgate Road are a prime example of such treatment, with even solid shutters permanently covering original fenestration. Virtually all transparency has been removed. Not only providing a visually negative corner, but removes natural surveillance both to and from the shop. In turn overhead neon lighting and cctv cameras have been installed to stop anti-social behaviour. Shopfronts are always best protected by having a stallriser and by use of security glass. Internal chainlink shutters allow additional protection where required. Shopfront design guidance available from Camden should be more readily made available to shopkeepers as a matter of course.

Policy DC4 Small residential extensions

It is inappropriate to allow roof extensions to properties for reason of needing extra family space, by claiming one otherwise has to move out of the area. This is not a material planning consideration and this policy should be strictly adhered to in the DPNP. Our neighbourhood is exceptionally well provided with a wide range of housing stock sizes, both houses and flats. I know numerous families who have moved more than once in this neighbourhood over their life time to upscale in space and downscale in later life. The pressure for allowing this comes from residents of the smaller houses. However, the irony is that such extensions then remove precisely the units these families used as their own starter family homes. In the lifespan of a building, a person's occupancy is only a short cycle. Most of such pre-CA extensions are evidence of the visual harm to rooflines that was introduced by discordant designs, ruined the rhythm of integral terrace's rear elevations and their roofscape. Due to our topography our area's roofscape is particularly important.

page 31

The roof extension at 67A Chetwynd Road (in York Rise) is a poor example of good design. The photo does not show its unresolved roof arrangement next to its neighbour. Additionally, the introduction of this structure also removed a pleasant view across the two-storey building to trees in back gardens viewed from Chetwynd Road.

CHAPTER 4: HOUSING

4.4

H1 My same comments apply to those under Policy DC4 above.

New development and one-bed apartments: Could there be a restriction placed on disallowing these turning into two-bed flats without needing change to a granted planning consent? The Highgate Chapel conversion received consent for one-bed units and subsequently turned those units by internal alterations into two-beds. I am concerned how one can be assured that residential space standards are thus maintained/monitored.

Pages34/35

This 2011 data must be well out-of-date for a baseline of the 15-year life of this document. There clearly has been a noticeable increase in rented accommodation of both houses and flats in this neighbourhood.

The 71% flats (Camden 85%) does not show if the 85% is still Council tenanted or what proportion is Leasehold and therefore available on the open market.

CHAPTER 5 COMMUNITY

I much support the provision of community facilities particularly cross generational facilities should be encouraged.

There appears to be a space missing such as the 10A Highgate Society room in Highgate Village a designated space where people can drop in on Saturdays to get general information, discuss current local issues and eg planning application. Noticeboards do not fulfil the same need. Unsure how much such facility would cost to provide for half a day per week, but such facility would make a very positive contribution to our community cohesion. The use of cafes or pubs are not suitable for such purpose as they have an alternative focus and obliges the user to expenditure at the premises.

CHAPTER 6: NEIGHBOURHOOD CENTRES AND EMPLOYMENT

As our small local centres are surrounded by, or in close proximity to, residential properties, a wish for "thriving" local centres should be carefully defined. Our local centres should not operate at the cost of loss of amenity to the primary use of our neighbourhood as residential. ie operating hours, licensing, noise, light pollution, table and chairs licenses etc should be carefully controlled and monitored. Primarily focussed on daytime A1 retailing, with a limit on A3 units. The prime area for "thriving" should more so centre on the Kentish Town town centre area and Fortess Road. We do wish for our local centres to be successful. Use Classes should be carefully controlled to retain a suitable mix for our neighbourhood,

The provision of outside freestanding heating units should not be permitted.

Fig 6A T

The York Rise/Chetwynd Road hub is incorrectly located on the map
The Highgate Studios also contain restaurants should these be marked?
Should the business hubs not be shown?.

page 51 Threats: Update!

page 52 York Rise/Chetwynd Road
This should be referred to as one cohesive centre.
Amend: Premises should not be referred to by name in a document with a 15-year lifespan.
Opportunities: I strongly object to the widening of pavements in York Rise and this part of the centre being singled out for public realm improvements. This cross junction should be improved as a whole which could be by use of special carriageway surface treatment.
The traffic lights which encourage chasing the green lights should be removed and replaced with zebra crossing, as is the case at Chester Road/Raydon junction. Softening the public realm will aid lowering traffic speed.
Widening of pavements will only facilitate the outdoor use of the A3 premises for seating. Increase of such use in this locality in this high-density residential part of townscape is not appropriate. There is already a restriction on the pub's Bellgate Mews side public pavement.

Use of the public pavements for waste/recycling containers or dumping should not be permitted, Private daily collection arrangements should be insisted on

page 54 Highgate Road.
Photograph needs updating.
Text needs updating re ASF site, and newly opened shops. Also include the A3 units of the Highgate Studios complex.
Refer here to the two garage premises, and the Southampton Arms.

The lower parade and its forecourt strip are controlled by Camden Council Commercial section.

page 55

Chester Road
The photograph shows the depressing reality of overdevelopment of a site.

Page 61

CE3 Public realm
Worth mentioning the existence of the Council's Streetscape Design Manual.

(4) Minimizing such facility, but make premises take out contract for have daily collections.

CE5 Character of Neighbourhood Centres

When listing the premises do so by address only. Remove all names from premises listing as these are not guaranteed to remain the same over a 15-year lifespan of Plan

(a) Add: 58 Chetwynd Road

Several of the Highgate Road (north) shop units contain original historic components/fascia board. These units should be encouraged to restore these elements.

Additionally, urgently seeking the reintroduction of transparency at 155-157 Highgate Road corner unit by opening up roller shutters when open and part removal of film attached to shopfront. Council support (CA officers) should have input to negotiate such improvements.

The restoration/upgrading of 143 and 145 Highgate Road should be taken as example

(c) Encourage installation of stallrisers in shopfronts and security glazing. ... views into the shop front and window display to facilitate natural Surveillance.

(e). add: internal illumination is required for advertising signs, Overhead trough lighting to low lux levels. (light pollution)

CHAPTER 7: ENVIRONMENT AND SUSTAINABILITY

Solar panels should not be permitted in the conservation area where visible from the public realm.

Fig 7A Local green spaces

Re-number 2 as the west side only is named Highgate Enclosures while the eastern side is called the Grove Terrace Squares.

Correct: The Grove Terrace Squares strip goes down to the lower green square in front of Denyer House (Camden Local Plan Policies Map see numbers 57) this needs to be coloured green.

Add: the green space of the Churchill Road estate.

ES1(e) Important to add that retaining lower hedges is also crucial for designing-out-crime by retaining visual transparency. Eg Needed in areas of the footpaths from Croftdown Road to Bertram Street and Chester Road. Retaining cared for hedges on eg Brookfield Estate will also aid by reduction Anti-social behaviour.

Fig 7B Biodiverse areas and green corridors

Green Corridor line should be shown down Highgate road to the slip road at to Darcar garage, it virtually joins the railway corridors.

CHAPTER 8: TRANSPORT AND STREETS

Include map showing the 7.5 tonne restriction footprint and perhaps other useful markers.

Project include an open cycle parking bay at the entrance of the Highgate Road Chapel in Chetwynd Road.

Remove surplus to regulatory requirement carriageway lining on Highgate Road. Excessive marking gives impression of fast road so traffic police do not enforce and drivers chase the green lights. This lining has also formed a visual barrier between east and west sides.

APPENDIX 1 Add view from Chetwynd Road at Grove End to BT Tower over Murphy's Yard.

APPENDIX 2 Heritage

Part A

The seven cover those in the Highgate Ward within the DPNP boundary . A further two are in the Kentish Town Ward area within the DPNP boundary. Namely:

Highgate Studios, 53-79 Highgate Road (No 506)

Murphy's locomotive sheds, 81 Highgate Road (No 630)

Part B

The Drying Grounds at York Rise Estate are already locally listed.

Add: all freestanding post boxes including the inset pillar mounted on on Dartmouth Park Hill.

Note: the "shadow' sign on 33 York Rise has long been protected by an Article 4 Direction.

The Parliament Hill bowling green huts are not Locally listed under part A. It would be good these are locally listed in their own right.

APPENDIX 3 COMMUNITY FACILITIES

No 12 is a Post Shop not a Post Office. There is a distinct difference.

Fig A3.1 again shows the blip at the Churchill Road footbridge/consistency

APPENDIX 4 OPEN SPACES

No 2 Highgate Enclosures. I object most strongly that this is suggested to cover the east and west side of Highgate Road. The east side has always been called the Grove Terrace Squares. The two should not be combined.

APPENDIX 5 PROJECTS

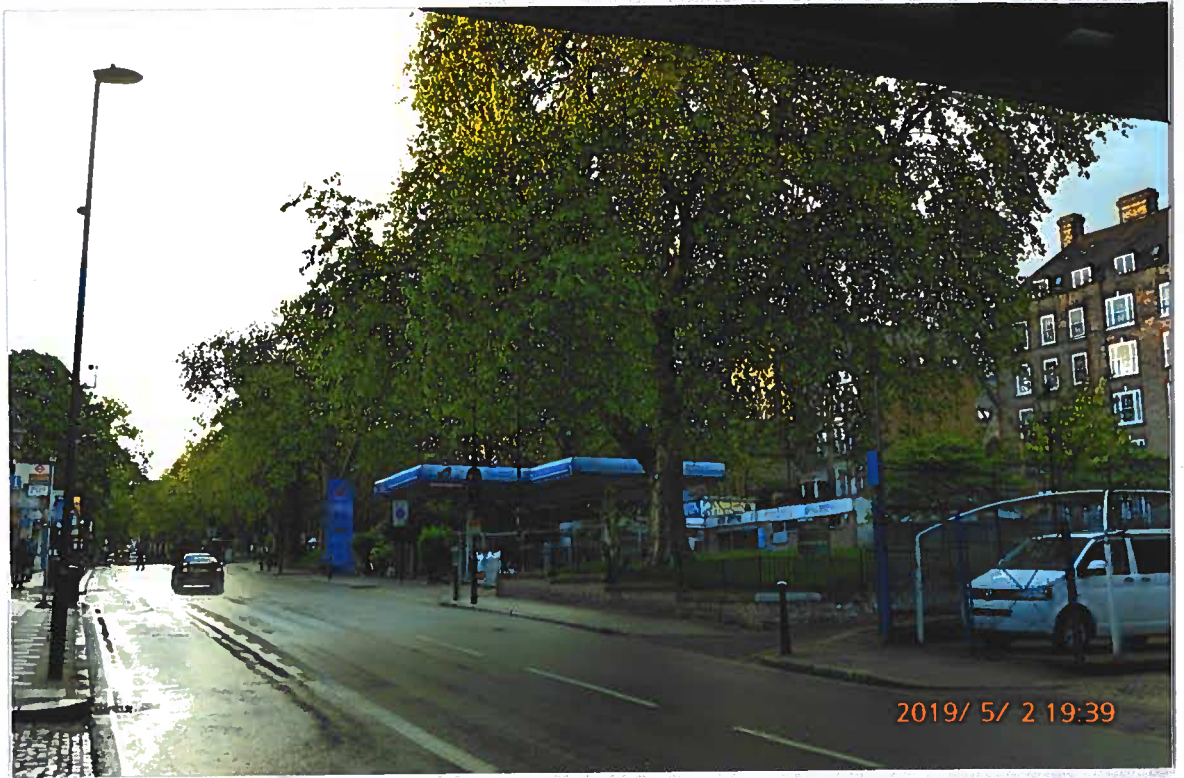
No 6 Should include graffiti tag removal

No 8 Update

Nos 7 and 15 Should be combined.

Add: A festive Christmas street tree lit in each neighbourhood centre.

(11)



1



2

MAY 19 VPNP

12



3



4

MAY 19 DPNP

13



5



6

May 19 DPNP