



**Intelligent Plans**  
and examinations

# **Report on Hampstead Neighbourhood Plan 2025-2040**

## **Review (Modification Proposal)**

**An Examination undertaken for the London Borough of Camden with the support of the Hampstead Neighbourhood Forum, on the submission version of the draft Plan.**

Independent Examiner: Jill Kingaby BSc(Econ) MSc MRTPI

Date of Report: 24 March 2025

## Contents

Main Findings - Executive Summary .....	4
1. Introduction and Context .....	4
Hampstead Neighbourhood Plan 2025 - 2040 .....	4
The Independent Examiner .....	5
Submitted Documents .....	5
Planning Policy Context .....	6
2. Procedural Considerations.....	7
Initial Determination .....	7
The Scope of the Examination .....	8
The Basic Conditions .....	9
Site Visit .....	9
Written Representations with or without Public Hearing .....	9
Examiner Modifications.....	10
3. Compliance Matters and Human Rights .....	10
Qualifying Body and Neighbourhood Plan Area .....	10
Plan Period .....	10
Neighbourhood Plan Preparation and Consultation .....	10
Development and Use of Land .....	11
Excluded Development .....	11
Human Rights .....	11
4. Assessment of the Basic Conditions .....	11
EU Obligations .....	11
Main Issues .....	12
Chapter 3. Design and Heritage .....	13
Chapter 4. Natural Environment.....	15
Chapter 5. Basements .....	16
Chapter 6. Traffic and Transport .....	16
Chapter 7. Economy.....	20
Chapter 8. Housing and Community .....	21
Other Matters .....	22
5. Conclusions.....	22
Summary .....	22
Recommendation.....	22
Overview .....	22
Appendix 1: Examiner Modifications (EMs) .....	24

Appendix 2: Forum’s Response of 31 January 2025 ..... 26  
Appendix 3: Forum’s Response of 15 February 2025 (incorporating revised Map  
5 provided on 24 February 2025)..... 26

## **Main Findings - Executive Summary**

I made an initial determination on 13 January 2025, confirmed in my letter of 4 February 2025, that the modifications contained in the Hampstead Neighbourhood Plan 2025-2040 (the draft Plan) are not so significant or substantial as to change the nature of the Neighbourhood Development Plan which the draft Plan would replace.

From my examination of the draft Plan and its supporting documentation, including the representations made, I have concluded that subject to the Examiner Modifications (EMs) set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the Hampstead Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – the Hampstead Neighbourhood Plan Area shown on Map 1;
- The Plan specifies the period to which it is to take effect – 2025-2040; and
- The policies relate to the development and use of land for a designated neighbourhood area.

Therefore, I recommend that the local planning authority should make the Plan with the EMs specified in this report (there will be no statutory requirement for a referendum).

## **1. Introduction and Context**

### **Hampstead Neighbourhood Plan 2025 - 2040**

1.1 Hampstead is located in the north-west of the London Borough of Camden (Camden Council). The Neighbourhood Plan Area includes much of Hampstead Heath, one of the best known areas of open space in London, which provides a wealth of habitats for wildlife and nature. The centre of Hampstead, extending along the A502, with Hampstead underground station at the core, has retained its old village character. The Neighbourhood Plan Area is shown on Map 1 of the revised draft Plan. The map makes clear that land beside Church Row and Perrin's Walk is excluded from the Hampstead area, as residents there have set up their own neighbourhood forum.<sup>1</sup> The Plan defines five different character areas distinguishable in terms of their history, topography and style of built development. Map 2 on Page 16 and the following text set out these areas. Hampstead is an area of high quality built development in an attractive green and hilly setting. The Neighbourhood Plan Area includes two conservation areas and parts of two additional conservation areas, as

---

<sup>1</sup> <https://www.camden.gov.uk/church-row-and-perrins-walk-neighbourhood-forum>

Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

shown on Map 3, as well as a significant number of listed buildings. The Plan Area includes the view from Parliament Hill to Central London, which is designated as special in the London Plan.<sup>2</sup> Heavy traffic and associated vehicle emissions are perceived as problematic in Hampstead, notably on the A502 London Distributor Road; the B511 and B519 Borough Distributor Roads along Fitzjohn's Avenue and Spaniards Road; and roads leading to South End Green and Fleet Road.

- 1.2 The Hampstead Neighbourhood Plan 2018-2033 was adopted in 2018, following a referendum with 91% voter support. In 2022, the Forum decided that it was time to ensure that the Plan was up to date. Camden Council carried out consultation on the redesignation of the Hampstead Neighbourhood Forum between 13 August and 8 October 2024.<sup>3</sup> The Council's assessment of the application for re-designation concluded that redesignation of the Forum should be made, and that the application complied with criteria in Section 61F of the Town and Country Planning Act 1990. Regarding the content of the Plan, the Forum considered that a revised Plan should retain the original vision to conserve and foster Hampstead's charm and liveability and maintain the original six main aims (Page 4 of the Plan). Proposed modifications are put forward by the Forum to reflect the increasing awareness of climate change, as set out in Government policy and demonstrated as important in local public consultation exercises, making it more essential to reduce the use of fossil fuels and encourage sustainable development. The significance of all the proposed modifications put forward in the revised draft Plan are discussed below.

### The Independent Examiner

- 1.3 As the draft Plan has now reached the examination stage, I have been appointed as the examiner of the Hampstead Neighbourhood Plan 2025-2040 by Camden Council, with the agreement of the Hampstead Neighbourhood Forum.
- 1.4 I am a chartered town planner and former government Planning Inspector, who examined the current adopted Hampstead Neighbourhood Plan 2018-2033. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

### Submitted Documents

- 1.5 I consider all policy, guidance and other reference documents relevant to the examination, including those submitted which comprise:

---

<sup>2</sup> <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

<sup>3</sup> The Forum was previously redesignated in 2019 (and originally designated in 2014): <https://www.camden.gov.uk/hampstead-neighbourhood-forum>

- The draft Hampstead Neighbourhood Plan 2025 -2040, as proposed to be modified;
- The Statement on Modifications [June 2024], from Hampstead Neighbourhood Forum;
- The London Borough of Camden’s Regulation 17 (e)(ii) Statement;
- Map 1 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
- A copy of the extant Hampstead Neighbourhood Plan 2018-2033, [October 2018];
- The Consultation Statement, [undated];
- The Basic Conditions Statement, [March 2024];
- The Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion Reports, dated respectively March 2024 and July 2024;
- The Forum’s responses to the examiner’s initial questions (13 January 2025) of 31 January 2025, and further questions (13 February 2025) of 15 February and 24 February 2025; and
- All the representations that have been made in accordance with the Regulation 16 consultation.<sup>4</sup>

## Planning Policy Context

- 1.6 The Development Plan for this part of the London Borough of Camden, not including documents relating to excluded minerals and waste development, is the London Plan [2021] and the Camden Local Plan<sup>5</sup> [2017]. The draft new Camden Local Plan 2024<sup>6</sup> was consulted on under Regulation 18 between January and March 2024, and the pre submission Regulation 19 version is anticipated in Spring 2025.
- 1.7 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). In addition, the PPG offers advice on how the NPPF should be implemented. All references in this report are to the December 2023 NPPF and its accompanying PPG.<sup>7</sup>

---

<sup>4</sup> View at: <https://www.camden.gov.uk/hampstead-neighbourhood-forum>

<sup>5</sup> <https://www.camden.gov.uk/camden-local-plan1>

<sup>6</sup> <https://www.camden.gov.uk/draft-new-local-plan>

<sup>7</sup> A revised NPPF was published on 12 December 2024 (with minor updates 7 February 2025) which includes transitional arrangements for neighbourhood plans. Paragraph 239 of the December 2024 NPPF advises that it’s policies will only apply to neighbourhood plans submitted after 12 March 2025.

## 2. Procedural Considerations

### Initial Determination

- 2.1 The draft Plan has been submitted as the second version of the Hampstead Neighbourhood Plan resulting from revision and updating of the first Plan, which was made in 2018. I was required to undertake an initial determination under paragraph 10(1) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act') as to whether the modifications contained in the draft Plan are so significant or substantial as to change the nature of the Neighbourhood Development Plan which the draft Plan would replace.
- 2.2 The purpose of the determination is to establish whether the modification proposal can be examined under the streamlined process for the making of the draft Plan set out in Schedule A2 of the 2004 Act or, in the event that the proposal contains material modifications which do change the nature of the Plan, it should be examined under process set out in Schedule 4B of the Planning Act 1990 (as amended), requiring both an examination and a referendum.
- 2.3 To inform this determination I considered all the relevant submitted documents, including the written statements on this matter provided by the qualifying body and local planning authority to comply with Regulations 15(1)(f) and 17(e)(ii) respectively of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations') and the representations. The Forum's "Statement on modifications to Hampstead Neighbourhood Plan 2018-2033 so as to produce Hampstead Neighbourhood Plan 2025-2040", June 2024, refers to the three possible types of modifications outlined in Government guidance.<sup>8</sup> It concludes that the changes made fall into the second category "material modifications which do not change the nature of the plan."
- 2.4 Camden Council commented on the revised draft Plan in September 2024, and stated that, subject to further changes set out in its accompanying table, the amended Plan would be in general conformity with the strategic policies in the Borough's adopted Local Plan 2017. Officers also assessed whether the amended Neighbourhood Plan would go so far as to "change the nature of the Plan", and require an examination and referendum. They considered that the extent of amendments vis-à-vis the adopted Neighbourhood Plan are limited, and concluded that the examiner should decide on the next steps. In my letter of 13 January 2025 to the Forum and Camden Council, I indicated that the modifications proposed in the draft new Neighbourhood Plan 2025-2040 required examination but did not appear to change the nature of the made Plan. My preliminary view was that a referendum would not be necessary. After reading the responses to the Regulation 16 exercise on the draft Plan, I asked for the

---

<sup>8</sup> See PPG Reference ID: 41-106-20190509.

Forum's comments on representations from Camden Council, Transport for London (TfL) and other respondents. I also asked Camden Council to provide a formal Regulation 17 (e)(ii) statement to inform fully my procedural determination and ensure legal compliance. The Forum's reply of 31 January 2025 provided detailed comment on the representations and the Regulation 17 statement was also duly provided by the local planning authority.

- 2.5 As set out in my procedural letter of 4 February 2025 to Camden Council and the Forum, I am content that the modifications proposed in the draft Plan are material but are not so significant or substantial as to change the nature of the Neighbourhood Development Plan which the draft Plan would replace. A referendum for approval of the revised and updated Neighbourhood Plan should not be necessary. I have conducted this examination in accordance with the relevant provisions in Schedule A2 to the 2004 Act, which I set out below.

### The Scope of the Examination

- 2.6 As the independent examiner I am required to produce this report and recommend either:
- (a) that the local planning authority should make the draft Plan; or
  - (b) that the local planning authority should make the draft Plan with the modifications specified in this report; or
  - (c) that the local planning authority should not make the draft Plan.
- 2.7 The scope of the examination is set out in Paragraph 11(1) of Schedule A2 to the 2004 Act. The examiner must consider:
- Whether the draft Plan meets the Basic Conditions;
  - Whether the draft Plan complies with provisions under s.38A and s.38B of the 2004 Act. These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;
    - it does not include provisions and policies for 'excluded development';
    - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area; and

- Such matters as prescribed in the 2012 Regulations.

2.8 I have considered only matters that fall within Paragraph 11(1) of Schedule A2 to the 2004 Act, with one exception. That is the requirement that the draft Plan is compatible with the Human Rights Convention.

### The Basic Conditions

2.9 The 'Basic Conditions' are set out in Paragraph 11(2) of Schedule A2 to the 2004 Act. In order to meet the Basic Conditions, the draft Plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>9</sup>; and
- Meet prescribed conditions and comply with prescribed matters.

2.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>10</sup>

### Site Visit

2.11 I made an unaccompanied site visit to the Neighbourhood Plan Area on 10 February 2025 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

### Written Representations with or without Public Hearing

2.12 This examination has been dealt with by written representations. The representations set out the objections and other comments clearly in relation to the draft Plan. There were no exceptional reasons or requests from interested parties to justify convening a public hearing.

---

<sup>9</sup> The existing body of environmental regulation is retained in UK law.

<sup>10</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

## Examiner Modifications

- 2.13 Where necessary, I have specified Examiner Modifications (**EMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have set out these modifications separately in Appendix 1 (further crossed referenced to Appendices 2 and 3).

## 3. Compliance Matters and Human Rights

### Qualifying Body and Neighbourhood Plan Area

- 3.1 The Hampstead Neighbourhood Plan 2025-2040 has been prepared and submitted for examination by Hampstead Neighbourhood Forum. The Neighbourhood Plan Area and Forum were initially designated by Camden Council in 2014. On the expiry of the 5 year statutory period, the Forum was redesignated in 2019, and then again in 2024.
- 3.2 Map 1 and paragraph 2.14 of the Plan accurately describe the area covered by the designation. Hampstead Neighbourhood Plan does not relate to a small area of land along Church Row and Perrin's Walk. Map 1 confirms that this land lies outside the designated Hampstead Neighbourhood Plan Area.

### Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2025 to 2040.

### Neighbourhood Plan Preparation and Consultation

- 3.4 The Consultation Statement accompanying the draft Plan records a series of publicity and consultation events, beginning in March 2022. Regulation 14 consultation took place in January and February 2024, and elicited 156 survey form responses (a form was provided for ease of response), plus about 10 e-mail responses. Responses to the consultation were collated and analysed, and the Forum invited discussion of the matters raised at the AGM in March 2024, which was attended by some 50 persons. Results of the consultation, and the Forum's responses to recipients' comments, were placed on the Forum website and published in the Ham&High newspaper. Following submission to Camden Council, statutory consultation on the revised Plan under Regulation 16 took place between August and October 2024, and resulted in responses from Camden Council, TfL and four other parties. Following my letters of 13 January 2025 and 13 February 2025, the Forum provided comments on the points raised by the interested parties. I am satisfied that the consultation process has sought to engage all residents, businesses and other community bodies in plan-making. It has met the legal requirements and had regard for advice in the PPG on plan preparation and engagement.

Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

## Development and Use of Land

- 3.5 Subject to a modification to delete clause 4(e) of Policy DH5 (see paragraph 4.10 below and EM5), the Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

## Excluded Development

- 3.6 The Plan does not include provisions and policies for 'excluded development'.<sup>11</sup>

## Human Rights

- 3.7 The Basic Conditions Statement, March 2024, advises that the Plan is not considered to have a negative discriminatory effect on people by virtue of their age, gender, race, sexual orientation, religion and belief, or disability. An Equalities Impact Assessment of the Regulation 14 draft Plan was carried out by Camden Council, which did not identify any negative discriminatory effects. I am satisfied from my independent assessment that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998).

## 4. Assessment of the Basic Conditions

### EU Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Camden Council in March 2024, which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Opinion, I support this conclusion.
- 4.2 The Hampstead Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA) by Camden Council in July 2024. This concluded that the Plan's policies would not have a significant effect on any European designated nature site, notably the network of Natura 2000 sites (Epping Forest, Richmond Park, Wimbledon Common and Lee Valley), because of the distance of the Plan Area from them, and because of the nature and scale of development envisaged in the Plan. The Council shared its Screening Opinion with Natural England which did not oppose this conclusion. From my independent assessment of this matter, I have no reason to disagree.

---

<sup>11</sup> See section 61K of the 1990 Act.

## Main Issues

- 4.3 I now address the remaining Basic Conditions, focussing on the proposed changes to the Plan. I assess the text and policies in the Plan on a sequential basis, beginning with section 1. Executive Summary. This describes the vision to conserve and foster Hampstead's charm and liveability etc. I note that the made Plan begins with the same vision. The draft Plan then outlines six aims beginning with "to ensure that Hampstead is lively and contemporary, while safeguarding the fine heritage of streets and buildings". The made Plan includes only five aims. The proposed new aim is listed as number 2 in the draft revised Neighbourhood Plan, and is "to ensure that Hampstead is promoting sustainability and energy efficiency, in order both to mitigate and adapt to climate emergency". The Forum states that public and local awareness of the need to achieve sustainable development has grown in recent years, and I consider that the new aim is in keeping with national, London and Camden policy priorities (including the emerging new Camden Local Plan). I note that Paragraph 11 of the NPPF was revised in 2021 (and carried forward in the December 2023 NPPF) to emphasise that plan-making should promote a sustainable pattern of development, improve the environment and mitigate climate change. I am satisfied that the Hampstead Plan's additional aim has regard for this part of the NPPF. It satisfies the Basic Conditions.
- 4.4 To meet its aims, both the made Plan and draft revised Plan name six policy areas: Design and Heritage; Natural Environment; Basements; Traffic and Transport; Economy; Housing and Community. These subjects are each addressed in the following chapters of the Plan, which set out the policies. The made Plan included 19 policies, whereas the draft revised Plan includes 20, as discussed further below. The revised Plan includes a new paragraph 2.5, referring to a mission statement adopted after the first Plan was made. The mission statement was designed to monitor the relevance and performance of the first Plan, prepare revisions and foster discussions on issues of importance to local residents. The revised draft Plan is the result. Paragraphs 2.8 and 2.9 are also updated in the draft Plan, highlighting the importance of sustainability and the need to mitigate and adapt to climate change. It is reported that flooding has occurred more frequently in Hampstead in recent years, reinforcing the need for less dependence on fossil fuels. Paragraph 2.11 refers to the public desire to reduce car traffic and promote alternative travel.
- 4.5 Paragraph 2.15 provides some demographic data, indicating that the current population is about 10,600 residents in about 4,800 households. This is lower than the figures of 12,372 residents in 5,513 households quoted in the made Plan. Paragraph 2.15 informs that the 2021 Census results have shaped the latest figures, which are not directly comparable with those in the 2018 made Plan. I am content that the Plan includes best estimates of population and households. I consider that chapters 1 and 2 set the scene appropriately for readers, with some helpful updates to the made Plan and a useful introduction to the policies contained in

Chapters 3 to 8. I conclude that Chapters 1 and 2 do not raise any issues contrary to the Basic Conditions.

### Chapter 3. Design and Heritage

- 4.6 The supporting text describes the character of the area, extent of conservation areas and important views. Map 2 showing five character areas, Map 3 showing four conservation areas, and Map 4 showing important viewpoints, are all similar to the maps in the made Plan. Policy DH1: Design in the draft Plan is more extensive and detailed than DH1 in the made Plan. Chapter 12 of the NPPF was updated in 2021 to emphasise the importance of “creating high quality, beautiful and sustainable buildings” (and is extant for the purposes of this examination in the December 2023 NPPF), and I consider the upgrade to Policy DH1 has regard for that aspect of national planning policy. Camden Council proposed a modification to Policy DH1(c) to remove the reference to biodiversity net gain (BNG), as this could be onerous for small scale householder development. I agree that it would be contrary to national and local policy, and note that an alteration to refer instead to “enhance biodiversity” would align with draft Policy D4 Extensions and Alterations in the emerging new Camden Local Plan. Camden Council also sought modification of clause (g) for conformity with its Local Plan to refer to “visual” privacy of neighbouring properties, which I support to give clarity. Modifications **EM1** should be made to Policy DH1(c) and (g) to secure general conformity with the Local Plan and meet the Basic Conditions for neighbourhood planning.
- 4.7 Policy DH2: Conservation areas and listed buildings, is prefaced by information that national planning policy requires a positive strategy for conservation and enjoyment of the historic environment. The policy meets the Basic Conditions, in my view, and is highly relevant for Hampstead with its numerous conservation areas, listed buildings and locally listed, non-designated heritage assets. Camden Council questioned paragraph 3.21 of the Plan, as it could conflict with paragraph 207 of the NPPF and cause confusion. I note that paragraph 207 expects sites where loss of a building is proposed to be assessed for “substantial harm” or “less than substantial harm”, and makes no reference to time periods for marketing. The Forum agreed to delete paragraph 3.21, which I support in view of Camden’s comments, and because the paragraph arguably adds a new policy requirement to the supporting text. Modification **EM2** should be made to delete 3.21, having regard for the NPPF.
- 4.8 Policy DH3: Sustainable development, is a new policy, not included in the made Neighbourhood Plan. However, the supporting text which refers to the NPPF, Mayor of London, Camden’s Clean Air Action Plan and Historic England guidance offers substantive justification for the new policy. The reference to evidence from Historic England should be redrafted so that it refers to its most recent guidance, produced in July 2024, Adapting Historic Buildings for Energy and Carbon Efficiency. Camden Council proposed modifications to the wording of Policy DH3 in the interests of

clarity, and to add a reference to the London Plan's policy on contributions to carbon off-setting. It also queried the content of paragraph 3.38, as it did not seem to fit with any of the criteria in the policy. The Forum has proposed new wording to take account of these comments, including the removal of paragraph 3.38, all of which I support. In addition, I consider that clause 2b) of Policy DH3, requiring all new build to be at least net zero carbon, could be onerous for minor development schemes and should be amended. I propose modified wording, as in **EM3**, to address all the above points and to meet the Basic Conditions.

- 4.9 Policy DH4: Clean and considerate construction, is also a new policy, designed to reduce the negative impact on neighbours and the environment when construction takes place. I appreciate that in the intensely developed areas of Hampstead, construction works and large commercial vehicles nearby can cause noise, pollution and traffic delays in and around people's homes. I therefore support the thrust of the new policy. Camden Council advised that paragraphs 3.44 and 3.45, referring to "performance bonds" and specific timelines for construction projects, were not matters that the planning system could control. The Forum put forward revised wording to these paragraphs, which has regard for national planning policy and which I support. Camden also recommended that the reference to a Circular Economy System be removed from clause 3 of Policy DH4, and I agree that the reference could cause confusion over the Construction Management Plan. Regarding clause 6 of Policy DH4, Camden Council stated that it would not be reasonable to require applicants to sign up for a Considerate Construction Scheme (CCS). The Plan may however encourage a CCS, and the Forum has produced revised wording for clause 6 to state this. Clause 5 does require schemes expected to last for more than 3 months to be registered with CCS before work starts. I am content for this to be retained, as it should apply principally to major development and would provide protection for the amenity of neighbours and the environment. In order to meet the Basic Conditions, the modifications in **EM4** should be made.
- 4.10 Policy DH5: The urban realm, is similar to Policy DH3 in the made Plan, but includes more detail in clauses 3 and 4. Camden Council suggested that clause 4 e) refers to a process unlike the other physical interventions listed. I agree that it goes beyond planning policy and should be deleted, as in modification **EM5**.
- 4.11 On Page 30, the Plan describes two Strategic Sites which feature in Camden's emerging draft Local Plan. I consider that the inclusion of these sites in the revised Neighbourhood Plan is helpful, and aligns with the direction of the upcoming Local Plan. Camden Council proposed a number of modifications to Page 30, to reflect the desire to align, to remove the reference to biodiversity net gain and instead seek biodiversity enhancement, and to provide the correct photograph of the Royal Mail Hampstead Delivery Office. The Forum agreed that these modifications should be made, and I recommend them all, as in **EM6** to meet the Basic Conditions.

## Chapter 4. Natural Environment

- 4.12 This chapter begins with the statement “An overwhelming body of evidence shows that biodiversity is in serious decline worldwide.” Paragraphs 4.1 and 4.2 have been added to the new draft Plan, and were not featured in the earlier made Plan. I appreciate that Chapter 15 of the NPPF, Policies A3, CC2 and CC3 of the Camden Local Plan and Policy GG2 of the London Plan address matters of conserving and enhancing the natural environment, biodiversity, climate change adaptation, water and flooding, and “good growth” - making the best use of land. The new text at the beginning of chapter 4 in the Plan has regard for and is consistent with latest information on the state of the green environment, and national and local planning policies, in my opinion.
- 4.13 Camden Council advised that biodiversity net gain (BNG) would not be required of householder developments such as home extensions, conservatories and loft conversions. The Forum proposed amendments to paragraphs 4.6 and 4.7, which I consider should be made having regard for national planning policy and the achievement of sustainable development. Also, Policy NE1: Supporting biodiversity and mitigating climate change should be modified, to clarify that clause 2 relates to residential development. The Forum has produced a revised Map 5, illustrating ecological networks and biodiversity corridors, with amendments to show the Network Priority Areas more precisely. The Forum has also proposed that the phrase “where possible” be added to the text of Policy NE2.2. I accept that these changes should assist the fair application of Policy NE2 to secure sustainable development and have regard for paragraph 180(d) of the NPPF. Modification **EM7** will secure all the above changes and satisfy the Basic Conditions.
- 4.14 Paragraph 4.21 is confusing in that it states that the sites listed in Policy NE3 and shown on Map 6 “are to be designated” as Local Green Space. These sites are already so designated (I am not aware of any changed circumstances), and were set out in the made Plan as well as Camden Council’s Policies Map. I appreciate that the Forum’s proposed re-wording aims to remedy this error, and broadly support the proposed change to paragraph 4.21. However, I consider that the words “have been designated as Local Green Spaces” should be used, rather than “are designated...”. Modification **EM8** should be made to achieve this.
- 4.15 I consider that Policy NE4 (1), (1a), (1c) and (2) should be modified as proposed by the Forum in response to the Council’s comments, in order to assist with decision making on planning applications. I also agree with the proposed amendment to paragraph 4.31 and relocation of The Veteran trees and locally important trees list from Appendix 4 to a new Chapter 9 in the Plan. Regarding paragraph 4.36 and BS5837, I agree that the 2012 version of the British Standard for trees may soon be out-of-date, and the first sentence of 4.36 should omit “2012”. I recommend that a new second sentence be added to state “The 2012 version of BS5837 (British Standard for Trees) is currently being reviewed, and a revised version is

expected to be in place in Spring 2025". Paragraph 4.34 should also be amended, as proposed by the Forum in response to comment from Camden Council, in order to secure the protection of existing tree canopies and root systems when new development is proposed. These modifications to Policy NE4 and the supporting text are included in **EM9**, which should be made having regard for national policy and guidance, and to achieve sustainable development.

## Chapter 5. Basements

- 4.16 The introduction to this chapter informs the reader that basement development can provide an opportunity to add space to homes in parts of Hampstead, but this can raise concern within the community. Basement construction can inflict structural damage, and may trigger flood risk on neighbouring properties. Hampstead's geography, topography, geology and hydrology, and the prevalence of Victorian terraces, or earlier townhouses with shallow foundations, can contribute to harmful effects when basement construction is undertaken, as described on Pages 44 and 45 of the Plan. Policy BA1: Basement Development, sets out the requirements for such development, and I agree with Camden Council that BA1 1c) should be deleted as it replicates BA1 3. The Forum has accepted that this modification should be made, and that the source of Map 7 should be clarified. It has also stated that the reference to "unusual" soil conditions should be amended in paragraph 5.10, and that capital letters should be used for Basement Impact Assessment in 5.12. Camden Council suggested a number of amendments to paragraph 5.12 which I consider necessary to ensure that Basement Impact Assessment and the necessary procedures are explained correctly. In addition, 5.13 referencing a Basement Construction Plan should be deleted. I recommend all the above modifications, as shown in **EM10**, to secure sustainable development.
- 4.17 Camden Council observed that Policy BA2: Local requirements for Construction Management Plans, would not be applicable for all basement schemes, as small extensions to existing basements would usually be exempt. It also pointed out that a cross-reference to paragraph 5.24 in clause 2 of the policy was superfluous, as 5.24 is no longer in place. I am satisfied that modifications put forward by the Forum in response to the Council should ensure that Policy BA2 meets the Basic Conditions, and I conclude that **EM11** should be made.

## Chapter 6. Traffic and Transport

- 4.18 The introduction to this chapter states that traffic congestion and associated vehicle emissions are key concerns in the Plan Area. It advises that Camden has an Air Quality Action Plan 2023-26 which encapsulates the Mayor of London's Transport Strategy and Camden's Transport Strategy. Camden Council's first objective in its Strategy is to improve air quality and reduce transport's impact on climate change, as the Borough's Road traffic accounts for about half of all pollution from nitrogen dioxide.

The third largest number of comments received in community consultation on Hampstead's draft Neighbourhood Plan related to matters of traffic congestion and pollution, and I witnessed at my site visit how busy is the road network. I consider that the thrust of Policy TT1: Traffic volumes and vehicle size, seeks to address the identified problems. It mirrors the earlier policy in the made Plan, has regard for the NPPF on Promoting sustainable development, and Camden Local Plan's Policies T1 (Parking, walking and public transport), and T4 (Sustainable movement of goods and materials).

- 4.19 Camden Council proposed modification of paragraph 6.14 regarding vehicles for servicing and delivery. It referred to its Planning Guidance: Transport 2021, and I note that paragraph 4.11 of the Guidance describes most of the factors cited in paragraph 6.14 of the Plan. Although paragraph 6.14 features in the existing made Plan, Camden's Guidance post-dates it. I consider that the text in paragraph 6.14 should be modified as proposed by Camden Council, to refer applicants to the Planning Guidance: Transport 2021. This is necessary to avoid confusion, and contribute towards the achievement of sustainable development. Camden Council also proposed changes to paragraph 6.17, referring specifically to financial contributions for transport improvement schemes, which could be sought from major development. I am satisfied that the content of paragraph 6.17, with the reference to paragraph 32 of the NPPF, provides sufficient information and does not rule out financial contributions towards transport improvements. The wording need not be modified to meet the Basic Conditions.
- 4.20 The Council questioned whether paragraph 6.20 should categorise developments likely to generate 100 or more person trips a day as "significant" for the application of Policy TT1. This description of "significant" is included in the supporting text rather than the policy itself, so I am satisfied that it amounts to guidance rather than a specific requirement. Also, the threshold was included in the made Neighbourhood Plan (paragraph 6.6 c). I conclude that the concept of "significant" developments in Policy TT1 and paragraph 6.20 should be retained, although the cross-reference to paragraph 6.6c in 6.20 should be changed to refer to "paragraph 6.7c".<sup>12</sup> I also note that TfL sought modification of paragraph 6.21 to inform readers that the London Plan requires pre-application advice from TfL for major developments. In its correspondence with me of 15 February 2025, the Forum agreed to modify paragraph 6.21 as sought by TfL, and I support this amendment.
- 4.21 TfL expressed concern over paragraph 6.25 that redevelopment, especially of very large sites, could have wider transport impacts beyond vehicle trips. Public transport, walking and cycling effects should therefore be assessed. In response, the Forum agreed to refer to "additional journeys" rather than "additional motor vehicle journeys" in

---

<sup>12</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

Policy TT1(1), and to refer to adverse impact on the local transport network, as well as the impact on air quality. Modified wording was also agreed for paragraph 6.25 in support of the revised Policy TT1. I consider that these modifications should be made to meet the Basic Conditions. TfL also observed that paragraph 6.26 omits to mention its guidance on Construction Logistics Plans, and the Forum agreed to add a reference. TfL also advised that downgrading the A502 for heavy vehicles' use north of Hampstead village should take into account that the A502 is an important route for buses. I am satisfied that the Forum's proposed amendment in its letter of 15 February 2025 should meet TfL's concern and enable sustainable development.

- 4.22 I note that Camden Council proposed focused changes to wording in Policy TT1 (1) and (2), with which the Forum agreed and which I support. The Council also pointed out that Delivery & Servicing Management Plans (DSMPs) are generally secured by S106 obligations and can be amended from time to time by submitting a new Delivery and Servicing Plan (DSP), not a full planning application. To correct this matter, paragraph 6.24 should be modified as proposed by the Forum. The terms DSMP and CMP should also be modified in Policy TT1, as the London Plan and TfL guidance now refer to Construction Logistics Plan (CLP) and DSPs. I conclude that modification **EM12** should be made to include all the above amendments, so that Policy TT1 and supporting text in 6.14, 6.20, 6.21, 6.24, 6.25, 6.26 and 6.28 are accurately presented, are in general conformity with transport and planning policy for London, and will contribute to sustainable development.
- 4.23 On pedestrian environments, I consider that Policy TT2 should enable improvements to the environment for people walking and cycling around Hampstead. Paragraph 6.32 should be modified to add a reference to Policy GG3 of the London Plan and to the Mayor's Healthy Streets Approach, as proposed by the Forum in response to TfL. Paragraph 6.41 refers to Public Transport Accessibility Levels (PTALs) which are used to measure the connectivity by public transport for different areas of London. Figure 6.9 indicates that there are a variety of PTALs across Hampstead, which is unsurprising in my opinion, given the extensiveness of Hampstead Heath and the intensity of development around Hampstead village and South End Green. The Forum has offered to present Figure 6.9 as a bar graph rather than a line graph in response to TfL, and I agree that this could give greater clarity. Also, I support revised text, in 6.43, to make reference to the underground and overground rail stations as well as bus provision; and in 6.44 to omit the reference to car-free development in selective areas. All are needed for general conformity with Policy T2 of the Local Plan and to meet the Basic Conditions. Modification **EM13** should be made to paragraphs 6.43 and 6.44 accordingly.
- 4.24 Camden Council and TfL commented that Policy TT3: Public transport, which seeks to restrict development in areas where PTAL is less than 5, could be unduly restrictive. The Forum proposed modifications to clauses

1 and 2 of the policy, enabling development in PTALs of 4 or over up to 2030, and in PTAL areas of 5 thereafter. I consider that these modifications should have regard for paragraph 86 of the NPPF, and should be made.

- 4.25 Policy TT4: Cycle and car ownership, is carried over from the made Plan, retains sufficient flexibility and meets the Basic Conditions.
- 4.26 Paragraphs 6.57 onwards describe The Vision for South End Green, as was included in the made Plan. In August 2024, Camden Council approved the "South End Green Safe and Healthy Streets Scheme". Approval of its detailed proposals appear to have prompted residents on Fleet Road, the "Save Our Street" group, to object to the future relocation of bus stands on to Fleet Street, which was part of the approved scheme. Save Our Street argues that the proposed changes at South End Green would be to the detriment of residents in Gospel Oak Ward, who live outside the HNP area and therefore have no voice. The boundary of the Neighbourhood Plan Area was designated following consultation over a wide area in 2014, and in the course of my assessment, including my site visit, I have seen no reason that leads me to a view that Camden Council should seek to review it (in any event, this is a matter beyond my purview).
- 4.27 The Forum pointed out that the Vision has no policy weight but reflects years of pressure from the local community to improve the road junction and open up space. The siting of bus stops is not a planning matter, and more generally, Safe and Healthy Streets Schemes are developed in the Council's capacity as the Local Highway/Traffic Authority for the Borough. The officer report seeking approval of the South End Green scheme sets out how the local community have been engaged during its design and development. The scheme is being brought forward by the Council as a trial, under an Experimental Traffic Order, which allows for monitoring of its impacts, and for further consultation with the local community and stakeholders. A final decision will then be made on whether the scheme is to be permanently retained as implemented.
- 4.28 TfL emphasised the importance of the bus interchange to support access to the Royal Free Hospital, Hampstead Heath, Hampstead Heath overground station, and the wider area. I recognise the importance of maintaining good access to the area alongside an enhanced public realm. As paragraph 6.61 encourages joint working between Camden Council, TfL and partner organisations, I am content for paragraphs 6.57 onwards to be retained. Minor amendments to 6.57 and 6.58 to provide additional information about problems with the streets around South End Green, and to correct the first sentence in paragraph 6.58, as proposed by Camden Council and agreed by the Forum should be made via modification **EM14**, to satisfy the Basic Conditions.

## Chapter 7. Economy

- 4.29 The revised Plan, like its predecessor, the made Plan, begins chapter 7 with the statement: "It is vital for Hampstead's future that it retains a flourishing local economy that attracts businesses and creates jobs". The revised Plan reminds the reader that the NPPF, in section 7, urges local plans to protect competitive town centres. Hampstead Town Centre is one of Camden's six retail centres and, as was noticeable at my site visit, is highly attractive to residents and visitors. South End Green Neighbourhood Centre provides essential shops and services to the nearby residents in South Hill Park and the Mansfield area, as well as servicing workers and visitors to the Royal Free Hospital. The covid-19 pandemic from 2020 onwards changed people's working and shopping habits, with more home-working, as well as more online shopping. In 2021, the Forum conducted a survey of local residents to understand their views of Hampstead's high street areas in the light of the pandemic. The majority commented positively on the range of shops, cafes, restaurants and other outlets in Hampstead, and commended the village atmosphere, sense of community and beauty/heritage etc. Traffic and air pollution were the principal areas of concern.
- 4.30 Government changes to the Use Classes Order have also taken place since the Hampstead Neighbourhood Plan was made in 2018. New Class E now permits the change of use from retail to estate agents, banks and building societies etc. without the need for an application for planning permission, so that clause 2 of Policy EC1: Healthy Retail Mix in the made Plan is now redundant. Policy EC1 in the revised Plan has regard for the change in Government policy, in my opinion, and it supports hubs for community-related and cultural activities as envisioned in Camden's Future High Streets' prospectus (also noting revised Policy EC1 aligns with Policy IE6 of the draft Local Plan 2024, Supporting town centres and high streets) and has regard for national planning policy.
- 4.31 On Policy EC2: Contributing positively to the retail environment, clauses 6-8 show a stronger approach to lighting on shops than in the made Plan. As the revised policy aims to minimise light pollution, strengthen the appearance of shopfronts and discourage lighting that would cause harm to wildlife, I support the modifications which should lead to sustainable development. The Forum agreed to modify the wording of clause 4 in response to comment from Camden Council, and I consider that the re-wording should now provide the necessary clarity to readers. Figures 7.7 and 7.8 show photographs of the Snappy Snaps and William Hill outlets in the revised Plan. Camden pointed out that it had granted consent since the made Plan was adopted for "Display of 3 x externally illuminated timber fascia signs and 1 x non-illuminated hanging sign" at Snappy Snaps. Camden considers that the shopfront has materially improved in recent years, so that the text about inappropriate signage beside Figure 7.7 is now out-of-date. Camden also observed that the signage at the William Hill property is no worse than a number of other shopfronts in the centre and has improved since 2015. Therefore Figure 7.8 should be

removed. The Forum agreed to delete Figures 7.7 and 7.8, and I recommend that the Plan is modified accordingly, to satisfy the Basic Conditions. Policy EC2 and Figures 7.7 & 7.8 should be modified as in **EM15**.

## Chapter 8. Housing and Community

- 4.32 The introduction to Chapter 8 has been extended in the revised Plan, to inform readers that the value of local housing stock has increased greatly over recent decades. In 2014, the mean house price in Hampstead Town Ward was £1.75 million, an increase of 250% over 10 years. Given the concomitant rise in the cost of living, it is suggested that the cohesiveness and diversity of the area may be suffering from the trends in house prices. The amount of social housing in the Neighbourhood Plan Area is described as very low, with a loss of small dwellings to conversions, to create more large and expensive dwellings. Policy HC1 in the draft Plan promotes a mix of housing that increases the proportion of affordable housing and gives a range of housing of different sizes. The thrust of the policy continues the theme in the made Plan, and is in general conformity with Policies H6 (Housing choice and mix) and H7 (Large and small houses) of the Camden Local Plan, in my view. A correction to Policy HC1(2) to refer to paragraph 8.6 above (not below), as in **EM16** will provide accuracy to assist readers.
- 4.33 Theatres Trust sought expansion of the list of community facilities in Policy HC2 to include the Well Walk Theatre, which provides theatre for children. The Forum accepted that it should be included in clause 1b) of Policy HC2 which lists Arts, libraries, facilities and museums. I support this modification. Camden Council drew attention to recent changes in the Use Classes Order, which mean that Hampstead Post Office, Royal Mail Delivery Office and Barclays Bank are no longer classified as A1 or A2 uses - shops, or financial and professional services. The Council has no powers within the planning system to require reprovision of a bank or building society. The Forum proposed to delete these facilities from clause 1 d) of HC2, and add a new clause 5, expressing support for initiatives to integrate postal and banking services in existing or new community facilities where feasible. I also consider that paragraph 8.10 should be modified, as agreed by the Forum in response to Camden Council, to clarify that the assets to the wider community listed in Policy HC2 are shown below paragraph 8.10, and not above it. These modifications to Policy HC2 and the supporting text, set out in **EM17**, should be made having regard for national policy and the achievement of sustainable development.
- 4.34 Policy HC3: Enhancing street life through the public realm, is supportive of good design and is unchanged since the made Plan was produced. However, Camden Council pointed out that clause 1 is unclear as to whether it is naming places in need of improvement, or existing good examples. South End Green is named. Paragraph 6.59 states that substantial public investment is needed at South End Green to make the

pedestrian experience acceptable, implying that it is not currently a good example. The Forum proposed to delete the examples from clause 1, and I consider that this should be done, as in **EM18**, for clarity and consistency, and to meet the Basic Conditions.

## Other Matters

- 4.35 I have read the consultation response from Andy and Kate Hobsbawm, who submitted comments on the “proposed urban development plan”. The Forum observed that the comments appeared to refer to the Camden Local Plan, and I note that there is particular concern about Swain’s Lane, which lies outside the Hampstead Neighbourhood Plan Area. I therefore make no further comment on the points raised.
- 4.36 As an advisory comment, when the Plan is being redrafted to take account of the EMs in this report, it should be re-checked for any typographical errors. Minor amendments to the text and numbering can be made consequential to the EMs, alongside any other minor non-material changes or updates, in agreement between the Forum and Camden Council.<sup>13</sup>

## 5. Conclusions

### Summary

- 5.1 The draft revised Hampstead Neighbourhood Plan (2025-2040) has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the draft Plan meets the Basic Conditions and other legal requirements. I have had regard for all the responses made following consultation on the draft Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have set out modifications to a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements.

### Recommendation

- 5.3 I recommend that that the London Borough of Camden should make the draft Hampstead Neighbourhood Plan with the modifications specified in Appendix 1 (further crossed referenced to Appendices 2 and 3) of this report.

### Overview

- 5.4 Hampstead Neighbourhood Forum is one of the earliest qualifying bodies in the country to review and revise its made Plan. The Forum stated that in 2022, it reflected that it was eight years since it had undertaken the

---

<sup>13</sup> PPG Reference ID: 41-106-20190509.

extensive public consultation that had guided the creation of its first Neighbourhood Plan. It considered it important to retain a public mandate for the Plan's policies, and hence decided to review the 2018 version. It was conscious that new legislation, new plans for London and Camden Council, the covid-19 pandemic, and the increasing awareness of climate change were affecting public perception and behaviour, as well as the effectiveness of the made Plan had changed the background for plan-making. I commend the Forum for thinking ahead and seeking to achieve a new, up-to-date Plan for Hampstead, which will reflect the current requirements of planning in Hampstead and address local people's aspirations. The revised draft Plan is clearly founded on the vision, main aims and policy topics which underpin the made Plan. The plan-makers have clearly put in much time and effort to review all aspects of these elements of the Plan, to understand their effectiveness since 2018, and identify where change is needed to advance the vision "to conserve and foster Hampstead's charm and liveability". I congratulate the Forum on this draft Plan, and appreciate all the work that has been put into producing a Plan that satisfies the Basic Conditions for Neighbourhood Planning, and meets the terms of Schedule A2 of the 2004 Act.

*Jill Kingaby*

Examiner

## Appendix 1: Examiner Modifications (EMs)

The following EMs cross refer to the amendments proposed in the Hampstead Neighbourhood Forum’s written responses<sup>14</sup> to the examiner’s questions.<sup>15</sup> These responses form part of this report at Appendices 2 and 3.

<b>Examiner Modification (EM) number</b>	<b>Page no./ other reference</b>	<b>Modification</b>
EM1	Page 20	Modify Policy DH1: Design, clauses c) and g) (as set out in Appendix 2).
EM2	Page 23	Delete paragraph 3.21 (as set out in Appendix 2).
EM3	Page 24 & 26	Modify Policy DH3: Sustainable development, modify paragraph 3.25 and delete paragraph 3.38 (as set out in Appendix 2).  Also, modify DH3 2.b) to begin: All new build <b><i>in major development schemes</i></b> should achieve at least net zero carbon .....
EM4	Pages 26-28	Modify Policy DH4: Clean and considerate construction, and paragraphs 3.44 & 3.45 (as set out in Appendix 2).
EM5	Page 28	Modify Policy DH5: The urban realm (as set out in Appendix 2).
EM6	Page 30	Modify the descriptions and illustrations of Strategic Site (as set out in Appendix 2).
EM7	Page 33-6	Modify Policies NE1: Supporting biodiversity and mitigating climate change, & NE2: Ecological networks and biodiversity corridors (as set out in Appendix 2).  Modify paragraphs 4.6 & 4.7 (as set out in Appendix 2).

<sup>14</sup> 31 January 20205, 15 February 2025 and 24 February 2025.

<sup>15</sup> 13 January 2025 and 13 February 2025.

		Replace Map 5: Biodiversity Corridors with the new map from the Forum (as provided in Appendix 3).
EM8	Page 38	Modify paragraph 4.21 (as set out in Appendix 2).  Further modify the first sentence of this paragraph to read: The sites in the Hampstead ... <b>have been</b> designated as Local Green Spaces .....
EM9	Pages 40-42	Modify paragraphs 4.31, 4.34 and 4.36 and Policy NE4: Trees (as set out in Appendix 2).  Relocate List of Veteran and Important Local Trees from Appendix 4 to a new Chapter 9, and renumber Appendices 5 & 6.  Add a new second sentence to paragraph 4.36: <b><i>"The 2012 version of BS5837 (British Standard for Trees) is currently being reviewed, and a revised version is expected to be in place in 2025."</i></b>
EM10	45-48	Modify Policy BA1: Basement Development; wording to Map 7; and paragraphs 5.10, 5.12 & 5.13 (as set out in Appendix 2).
EM11	49&50	Modify Policy BA2: Local Requirements for Construction Management Plans (CMP) (as set out in Appendix 2).
EM12	54-58	Modify Policy TT1: Traffic volumes and vehicle size, and paragraphs 6.14 & 6.24 (set out in Appendix 2).  Modify supporting text in paragraphs 6.21, 6.25, 6.26, 6.28 (as set out in Appendix 3).  Modify paragraph 6.20 so that it refers to <b>paragraph 6.7c</b> of Camden's Local Plan, not 6.6c.

EM13	59-61	Modify paragraphs 6.32, 6.43 and 6.44, as well as Fig 6.9 (as set out in Appendix 2).
EM14	63-66	Modify Policy TT3: Public transport and paragraphs 6.57 & 6.58, (as set out in Appendix 2).
EM15	71 & 72	Modify Policy EC2 and delete Figures 7.7 & 7.8 (as set out in Appendix 2).
EM16	75	Modify Policy HC1: Housing mix (as set out in Appendix 2).
EM17	75-76	Modify Policy HC2: Community facilities, and paragraph 8.10 (as set out in Appendix 2).
EM18	77	Modify Policy HC3: Enhancing street life through the public realm (as set out in Appendix 2).

## **Appendix 2: Forum’s Response of 31 January 2025**

The Hampstead Neighbourhood Forum’s Response of 31 January 2025 (to the examiners questions of 13 January 2025) forms Appendix 2 and is attached as a separate PDF document to this report.

The modifications, as cross referenced with Appendix 1, are shown in ~~strikethrough~~ (denoting deletions) and **red font** (denoting the insertion of new text).

The Appendix 2 document can also be viewed online here:

<https://www.camden.gov.uk/documents/d/guest/hampstead-forum-response-31-january-2025>

## **Appendix 3: Forum’s Response of 15 February 2025 (incorporating revised Map 5 provided on 24 February 2025)**

The Hampstead Neighbourhood Forum’s Response of 15 February 2025 (to the examiner’s questions of 13 February 2025) and further response of 25 February 2025 forms Appendix 2. These responses are attached as a separate (consolidated) PDF document to this report.

The modifications, as cross referenced with Appendix 1, are shown in ~~strikethrough~~ (denoting deletions) and **red font** (denoting the insertion of new text).

The Appendix 3 document can also be viewed online here:

<https://www.camden.gov.uk/documents/d/guest/forum-responses-february-2025>

## **Hampstead Neighbourhood Forum: responses to comments on submitted Plan**

### **Note to the examiner:**

Thank you very much for reviewing our Neighbourhood Plan.

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

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

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

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

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

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

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

We stand ready to answer any questions about our responses.

Thank you.

Alex Nicoll  
Chair  
Hampstead Neighbourhood Forum

31 January 2025

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

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

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

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

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

DH4 (6)

We consider that the Considerate Constructors Scheme (CCS) provides a useful mechanism for raising construction standards and managing impacts on the community. The current approach is that where a Construction Management Plan (CMP) is required, the Council will expect the applicant to sign up (and be compliant) with this scheme.

CMPs are required for all major developments but also for minor developments in specific circumstances, e.g. where there would be a significant impact on the adjoining properties, there is poor/limited access or access involves moving vehicles along narrow residential streets. The full range of circumstances are set out in [Camden Planning Guidance: Amenity 2021](#). The Council charges a fee for the review and approval of a CMP; developers also have to pay when securing compliance with the Considerate Constructors Scheme.

Paragraph 56 of the NPPF states that planning conditions must be necessary, relevant to planning and reasonable. We consider it would not be reasonable to require applicants to sign up for CCS where no CMP is required. Further, it is particularly difficult to enforce a condition where it relies upon compliance with other legislation/procedures (outside of planning). We note that the 3 month threshold in the draft NP would likely be exceeded by the vast majority of developments. We consider that the approach of linking CCS with the CMP is the most appropriate and effective way of dealing with these issues and recognises the limitations in which the Council operates. The Neighbourhood Plan may however seek to encourage CCS for schemes where a CMP is not required but for the reasons set out above, this would be at the applicant's discretion and would not have a bearing on whether planning

This proposed requirement reflects strong feeling within the Hampstead community about projects that have lasted for unacceptably long periods and have caused unacceptable harm to residents living near long-running and badly-managed projects. We were aware that Camden 'expects' projects with CMPs to sign up for the CCS. What we were seeking to do was to add a level of requirement. The result was the language in the draft which is being examined. We consider it reasonable for a Neighbourhood Plan to introduce such a requirement as it responds to particular circumstances that have arisen in the Neighbourhood Plan area – that is, that the 'expectation' of the Council has not been enough to foster orderly behaviour by developers and contractors in our area. We know that being registered with the CCS may have only limited effect.

Therefore, we would like to keep the proposed language of DH4 (5). We can accept that DH4 (6) would be difficult to apply in practice and we are willing to drop it as a requirement. Therefore, we propose to retain DH4 (5) but re-draft DH4 (6) as follows:

**6. Sites where development is unfinished three months after the start of work are encouraged to be registered with the Considerate Constructors Scheme, and registration details displayed on the site.**

	consent is granted.	
--	---------------------	--

DH5 (4) (b)	<p>“Incorporating building-scale renewable energy generation such as solar panels where feasible”</p> <p>We understand that the acceptability of such proposals would need to be considered in the context of wider heritage and conservation policies/considerations, including Policy DH3 (1)(a): it would therefore be beneficial to cross-reference this policy to make this clear</p>	<p>Redraft to read:</p> <p>b) Incorporating building-scale renewable energy generation such as solar panels  <b>where compatible with design and heritage policies, such as DH3 (1).</b></p>
(4) (e)	<p>“Ensuring construction management minimises waste and pollution”: this refers to a process rather than an enhancement to the public and therefore, doesn’t fit with the other physical interventions listed; we consider the text should be removed</p>	Remove (4) (e)

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

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

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

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

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

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

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

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

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

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

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

6.32	In response to TfL suggestions.	Redraft 6.32 to read: To make streets more welcoming for pedestrians, Policies T2, GG3 and D8 of the London Plan, (which incorporate the Mayor's Healthy Streets approach) require development to reduce the dominance of vehicles, to increase the permeability of streets, remove unnecessary street clutter and avoid barriers to movement that create severance for pedestrians and cyclists so that pedestrians can cross the street more easily. The Camden Transport Strategy 2019-2041 establishes a hierarchy of road users, giving priority to pedestrians ahead of all other modes of travel, while Policy T1 of the Camden Local Plan seeks to ensure that developments improve the pedestrian environment.
6.42	In response to TFL comments (note: data was downloaded from TFL website)	We propose to present Fig. 6.9 as a bar graph rather than a line graph. We could also show the ward boundary outline more clearly.
6.42	In response to TFL comments:	Redraft 6.42 to read: Transport for London's 2014 analysis (the latest published) shows that the Hampstead Town ward has a relatively low PTAL scores compared with other inner suburban areas and with Camden as a whole. Of the population of Hampstead Town Ward, 71% live at locations with PTAL scores of 0-3, compared with the average for Camden as a whole of only 29%. Overall, Hampstead has a PTAL score of 4.0%, below the score of 5.6% for the borough as whole. <del>which is noticeably below the borough-wide score of 5.6 for Camden. The percentage of people in Hampstead-Town ward living in areas with a PTAL-score of 3 or less is 70% of the total population, compared to only 29% across the borough as a whole.</del>
6.43	In response to TFL comments:	Redraft 6.43 as follows:  The TfL map reproduced here- at Map 9 shows that connectivity in the most populated part of the Plan Area is closely associated with bus provision, despite the Underground and Overground stations at the western and southern boundaries of the Plan area. South End Green, at the

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

		<p>this policy may be waived provided that public transport improvements necessary to elevate the site's PTAL score to 5 or over from completion are secured, or a Travel Plan produced which would provide good accessibility to the new development with measures to mitigate harm from congestion and air pollution. Planning obligations should be used to secure these results.</p>
--	--	--

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

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

	<p>Neighbourhood Plan policies. As part of the assessment of the application, the Council considered objections raised about the branding on the fascia and the colour scheme – it was considered that the hand painting onto timber was a positive feature consistent with the location in a conservation area but the Officer’s report also states that advertisement consent controls did not provide the Council with the power to resist the colour being used. It is therefore difficult to see what more could be done to improve the shopfront via the planning process. There are also other premises in this frontage/part of the Town Centre which appear to be similar or (subjectively) worse, yet do not appear in the Neighbourhood Plan.</p>	
--	--	--

	<p>As the shopfront has materially improved over the last decade as a result of negotiations between the Council and landowner (as evident in Google StreetView), we consider the text about the inappropriateness of the signage is out of date and should be removed</p>	
--	--	--

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

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

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

	Forum, we consider the reference to South End Green may need to be removed	
--	--	--

**From:** Andy Hobsbawm [REDACTED]  
**Sent:** Monday, September 30, 2024 3:37 PM  
**To:** safetravel <[safetravel@camden.gov.uk](mailto:safetravel@camden.gov.uk)>  
**Subject:** \*\*\*Re: REMINDER: Consultation on an update to the Hampstead Neighbourhood Plan and application for redesignation of the Hampstead Neighbourhood Forum

You don't often get email from [REDACTED] [Learn why this is important](#)

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

Dear Camden Council,

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

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

**1. Insufficient Community Consultation**

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

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

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

**3. Air Quality Impact**

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

**4. Risk of Overdevelopment and Loss of Character**

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

**5. Parking and Accessibility Issues**

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

**6. Lack of Strong Protection for Local Green Spaces**

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

We urge the planning committee to carefully consider these objections.

Andy and Kate Hobsbawm



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

---

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

Dear Planning Policy Team

### **Draft Revised Neighbourhood Plan and Redesignation of the Hampstead Neighbourhood Forum**

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

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As such, we have reviewed the revised Plan in respect of the potential for any significant impacts on proposals affecting the historic environment. The proposed draft plan continues to reflect the strong focus on preserving and enhancing heritage within the plan area as set out in the current neighbourhood plan. As such, we do not wish to comment in detail and consider that likely impacts of the plan on the historic environment to be positive. We are therefore content for the local authority to determine this application in the basis of its own specialist advice and wider consultation responses.

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

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

Tel. [REDACTED]



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://historicengland.org.uk/strategy).

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.

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

---

You don't often get email from [saveourstreet@gmail.com](mailto:saveourstreet@gmail.com). [Learn why this is important](#)

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

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

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

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

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

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

Regards,

Pat Newby  
(on behalf of Save Our Street)

## RESPONSE FROM HAMPSTEAD NEIGHBOURHOOD FORUM

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

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

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

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

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

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

We have proposed above an amendment to 6.57.

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

---

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

Good Morning

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

**Remit:**

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

**Comment:**

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

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

Kind regards,

Tom Clarke MRTPI  
National Planning Adviser

**Theatres Trust**

22 Charing Cross Road, London WC2H 0QL

T  
E

W [theatretrust.org.uk](http://theatretrust.org.uk)

Twitter [@TheatresTrust](#) Facebook [Theatres.Trust](#) Instagram [@theatretrust](#)

[Sign up to our newsletter](#) to receive updates on our work

[Donate via JustGiving](#) to support our work

The Theatres Trust is the national advisory public body for theatres. The Theatres Trust Charitable Fund supports the work of The Theatres Trust, has the same

Trustees and is registered as a charity under number 274697.

The contents of this email are intended for the named addressee(s) only. It may contain confidential and/or privileged information, and is subject to the provisions of the Data Protection Act 1998. Unless you are the named addressee (or authorised to receive it for the addressee you may not copy or use it, or disclose it to anyone else. If you receive it in error please notify us.

You should be aware that all electronic mail from, to and within the Theatres Trust may be subject to public disclosure under the Freedom of Information Act 2000, and the confidentiality of this email and any replies cannot be guaranteed. Unless otherwise specified, the opinions expressed herein do not necessarily represent those of the Theatres Trust or The Theatres Trust Charitable Fund.

**Save energy and paper.**

**Hampstead Neighbourhood Forum's response:**

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



planningpolicy@camden.gov.uk

Transport for London  
Spatial Planning

8th Floor  
5 Endeavour Square  
London E20 1JN

Phone [REDACTED]  
tfl.gov.uk

8 October 2024

## **Consultation on revised Hampstead Neighbourhood Plan (Regulation 16)**

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).

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

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

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

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

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

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

Yours faithfully



Josephine Vos

**London Plan and Planning Obligations Manager**

Email: [REDACTED]

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

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

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

Hampstead Neighbourhood Forum  
 Responses to TfL comments regarding 6.21, 6.25, 6.26 and 6.28  
 15 February 2025

Policy/Paragraph as proposed	TfL's comments	HNF Response
<p>6.21. . . Applicants should discuss, and agree, the need for and content or scope of these documents with the local planning authority at the pre-application stage. This helps to avoid abortive work by applicants and planning officers, and the need for later revisions to the documents or development proposals.</p>	<p>Paragraph 6.21 should make it clear that pre application advice for major developments should also be sought from Transport for London. We recommend that the penultimate sentence is clarified as follows: 'Applicants should discuss, and agree, the need for and content or scope of these documents with the local planning authority and (for major developments) Transport for London at the pre-application stage.'</p>	<p>Redraft as follows:</p> <p>6.21 . . . Applicants should discuss, and agree, the need for and content or scope of these documents with the local planning authority and, for major developments, Transport for London at the pre-application stage.</p>
<p>6.25 It should be noted that paragraph 1 of Policy TT1 is concerned with additional motor vehicle use and its objective is to prevent additional vehicle traffic and pollution. Therefore, if existing premises are refurbished or redeveloped in a way which does not increase motor vehicle use or pollution then paragraph 1 of this Policy will not apply. However, applicants should also have regard for the London Plan's Policy T6 (L): Parking. This states that the existing parking</p>	<p>Paragraph 6.25 is potentially confusing because redevelopment could refer to a very large site that is redeveloped. As written, it does not allow for redevelopments that may have wider transport impacts beyond vehicle trips. For example, any impact on public transport, walking, cycling should be assessed.</p>	<p>To address TfL's concerns and improve the policy, we will redraft TT1 (1) as follows:</p> <p>Due to the critical need to improve air quality and tackle congestion within the Plan Area:</p> <p>1. Planning proposals that can reasonably be expected to result in a significant number of additional journeys to and from a proposal site post-completion should provide the following information at an appropriate level of detail to allow a robust assessment of the impact of the proposal on air quality, levels of pollution, and the local transport network:</p> <p>a. A Transport Assessment (or Statement);  b. A full or outline Delivery and Servicing Management Plan</p>

<p>provision for refurbishments should be reduced and not re-provided at the same levels where this would exceed the standards for new development set out in that policy.</p>		<p>(DSMP); c. An Air Quality Assessment;</p> <p>which should together demonstrate (if necessary, through mitigation measures) that <b>the impact of any such journeys</b> will be offset so that approval will not lead to an overall reduction in air quality in the Plan Area <b>or have a significant adverse impact on the local transport network.</b></p> <p>Paragraph 6.25 to be revised as follows:</p> <p>It should be noted that paragraph 1 of Policy TT1 is concerned with additional <del>motor vehicle</del> journeys and its objective is to prevent additional vehicle traffic, pollution, <b>and adverse impacts on the local transport network.</b> <del>Therefore, if existing premises are refurbished or redeveloped in a way which does not increase motor vehicle use or pollution then paragraph 1 of this Policy will not apply.</del> For redevelopment or refurbishment of existing premises, applicants should assess whether the proposal is likely to generate additional journeys or change travel patterns compared to the existing use. If there is no significant increase in journeys or change in travel patterns, then paragraph 1 of this Policy may not apply. <del>However, applicants should also have regard for the London Plan's Policy T6 (L): Parking. This states that the existing parking provision for refurbishments should be reduced and not re-provided at the same levels where this would exceed the standards for new development set out in that policy.</del></p> <p>However, all proposals should consider potential impacts on public transport, walking, and cycling, as well as motor vehicle use. Applicants should also have regard for the London Plan's Policy T6:</p>
--	--	---

Hampstead Neighbourhood Forum  
 Responses to TfL comments regarding 6.21, 6.25, 6.26 and 6.28  
 15 February 2025

		Parking, which states that existing parking provision should be reduced and not re-provided at previous levels where this would exceed the standards set out in that policy.
6.26 Further guidance on Construction Management Plans can be found in Camden Planning Guidance – Amenity.	Additionally, paragraph 6.26 should refer to TfL guidance on Construction Logistics Plans.	6.26 to be revised to read:  Further guidance on Construction Management Plans can be found in Camden Planning Guidance 6 – Amenity and <b>TfL's guidance on Construction Logistics Plans.</b>
6.28 The Plan encourages Camden Council to work with TfL and other organisations to discourage through traffic entering the Plan Area, particularly by promoting the following measures: a) Downgrading the A502 London Distributor Road given its unsuitability for heavy vehicles north of Hampstead village.	Paragraph 6.28 encourages the downgrading of the A502 to the north of Hampstead Village. Any proposals that affect the A502 should take into account that this is an important route for buses.	6.28 The Plan encourages Camden Council to work with TfL and other organisations to manage traffic flow through the Plan Area, particularly by promoting the following measures:  a. <del>Downgrading the A502 London Distributor Road given its unsuitability for heavy vehicles north of Hampstead village.</del> <b>Reviewing the classification of the A502 north of Hampstead village, considering its suitability for different vehicle types while preserving its function as a bus route.</b>

Map sent by email 24 February 2025

Dear Intelligent Plans,

Please find attached a new copy of Map 5 as requested by the examiner. We hope that the delineation is now clearer.

In order to keep the email chain intact, I am also attaching the comments we previously sent you in response to the examiner's transport questions contained in her latest letter.

As the examiner requested, I will post her letter and our responses on our website.

With many thanks and best wishes,

Alex Nicoll

Hampstead Neighbourhood Forum

