

# CONSULTATION STATEMENT

## 1. Introduction

This Consultation Statement has been prepared to fulfill the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should provide:

- details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- an explanation of how they were consulted;
- a summary of the main issues and concerns raised by the persons consulted;
- a description of how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Alongside fulfilling the above, this document provides a narrative on the overall process of producing this neighbourhood development plan.

The preparation of the submission draft of the neighbourhood development plan for the Redington Frogna Area, known as the Redington Frogna Neighbourhood Plan, has taken around five years and involved numerous stages of public engagement.

The pre-submission consultation (Regulation 14) ran from 28 October to 23 January 2019. As a result of comments received from the London Borough of Camden, the policies were restructured to make the Plan less prescriptive, and a design policy, based on the original design codes added, but without specifying the amount of decoration (which would not have met the Basic Conditions tests). A local heritage policy for Kidderpore Reservoir was also added.

Following these revisions, a second Regulation 14 consultation ran from 24 June until 5 August 2019. Significant revisions made as a result of the second Regulation 14 consultation were the:

- deletion of Finchley Road – a Healthy Street, as this concerned non-planning matters
- removal of the policy on Key Views, which would be unlikely to prove effective
- retitling of guidance document, Design and Landscape Guidance (formerly Design Codes, then Design and Landscape Guidance)
- downgrading of the policy for Aspirational Development Sites to Design Guidance for Possible Redevelopment Opportunity Sites
- removal of the table setting out estimates of the potential number of deliverable housing units.

The key consultation methods and inputs into the development of the Redington Frogna Neighbourhood Plan are summarised in the following pages.

## 2. POLICIES AND EVIDENCE BASE DEVELOPMENT

### 2.1 STARTING OUT

Redington Froggnal Association is an umbrella group of street and residents associations within the Redington Froggnal Conservation Area. It was established as a limited company on 17 November 1997. It enjoys a constructive relationship with Camden Council, provides input into Redington Froggnal Conservation Area appraisals and assists residents with responding to development proposals. It works closely with Hampstead Conservation Area Advisory Committee.

An initial sub group was formed on 28 February 2012, to reflect on the merits of developing a neighbourhood plan. Potential issues, defining the boundaries and likely consultees were considered.

On 18 April 2012, six members of Redington Froggnal Association met two senior officers from Camden to receive guidance on applying to form a Neighbourhood Forum. Likely boundaries and objectives had already been discussed and possible consultees were being considered. A meeting of the Neighbourhood Forum sub group was held on 5 March 2012. This was also attended by a representative from Heath and Hampstead Society, which was similarly considering the formation of a Neighbourhood Forum Committee.

A neighbourhood planning meeting at Burgh House, arranged by Camden Council, was attended on 3 September 2013. This included presentations by Department for Communities and Local Government and Camden Council. Other attendees were Heath and Hampstead Society and Cllr. Chung, Rev. S. Tucker, Hampstead traders and local residents. Meetings were also held with adjoining Netherhall Neighbourhood Association and Hampstead Neighbourhood Association.

A meeting with Camden Council and Imagine Places, a neighbourhood planning specialist, on 14 January 2014, discussed impediments to progress, notably the need to establish a website, developing a CAD map and limited manpower resources. Planning issues identified were: extensions under and across gardens; the growing number of "mega mansions", displacing family housing; constant applications to alter and re-alter the Edwardian housing stock and the unchecked growth of schools and pupil numbers (currently about 20,000 pupils) and excessive school-run traffic. Other potential neighbourhood plan policies included the encouragement of tree planting, a strengthening of Biodiversity measures and the identification of Assets of Community Value. It was noted that the Neighbourhood Plan boundaries would be constrained by the boundaries agreed to adjoining plans to the south (Netherhall Neighbourhood Association), to the west (Fortune Green and West Hampstead Neighbourhood Plan) and to the east (Hampstead Neighbourhood Plan). Contact was also established with Child's Hill Residents Association, Church Row Residents Association, Netherhall Neighbourhood Association and Fortune Green and West Hampstead Neighbourhood Forum.

## 2.2 BOUNDARIES CONSULTATION: 2 MARCH 2014

A public consultation on the boundaries of the Neighbourhood Plan Area was arranged for 2 March 2014. This was publicised with a flyer



**Redington Frogmal Conservation Area**  
is establishing a Neighbourhood Plan  
**We need your help**

The purpose of the plan is to sustain the character of the Conservation Area, while at the same time allowing for development and growth, if it is necessary and sympathetic to the character of the area.

**When:** Sunday March 2nd 4pm-6pm

**Where:** LKS voluntary Frogmal Hampstead London NW3 1XH

The creation of a Redfrog Neighbourhood Plan will enable the community to guide the development of its area, with support from Camden.

Without such a Neighbourhood Plan, Camden's ability to reject unsuitable development proposals will be severely limited.

**Please join us and have your voice heard.** [neighbourhood@redfroghampstead.org](mailto:neighbourhood@redfroghampstead.org)  
**Leading your own Consultation process is easy.** [www.surveymonkey.com/RedFrogNeighbourhood](http://www.surveymonkey.com/RedFrogNeighbourhood)



**A Redfrog Neighbourhood Plan**  
will enable the community to guide the development of its area, with support from Camden Council.

**This is to be community-led** and in no form the basis of planning policy, but wholly reliant on Camden's existing policies for local development.

**We need you to help** protect the character of your local settings, green spaces and trees.

Interested residents and community members should join the Neighbourhood Forum, as envisaged in the new Localism Act.



More than 2,000 flyers were printed, setting out the case for developing a Neighbourhood Plan and seeking residents' input through attendance at a public consultation and through completion of an on-line survey. Two weeks prior to the consultation, volunteers delivered the flyers to every letterbox within the Redington Frognal Conservation Area and on Finchley Road. The few businesses contained within Redington Frognal, at the time, included mainly schools, some retail premises and cafés along Finchley Road, two hotels, two churches, Craxton Music Studio, a violin workshop and the Frognal Gate office development. Flyers were handed in to non-residential addresses, and a personal explanation of the potential benefits of a neighbourhood plan provided. Interest had been expressed by Hampstead School of Art, St. Luke's School and Florian Leonhard Fine Violins.

Posters advertising the consultation and the on-line survey were affixed to lampposts (with the consent of [REDACTED], Borough Monitoring Manager) to coincide with the delivery of the flyers (two weeks' in advance of the consultation). More than 200 were displayed, including at Studholme Court and by bus stops on Finchley Road.

### **Lamp post notice of public consultation**

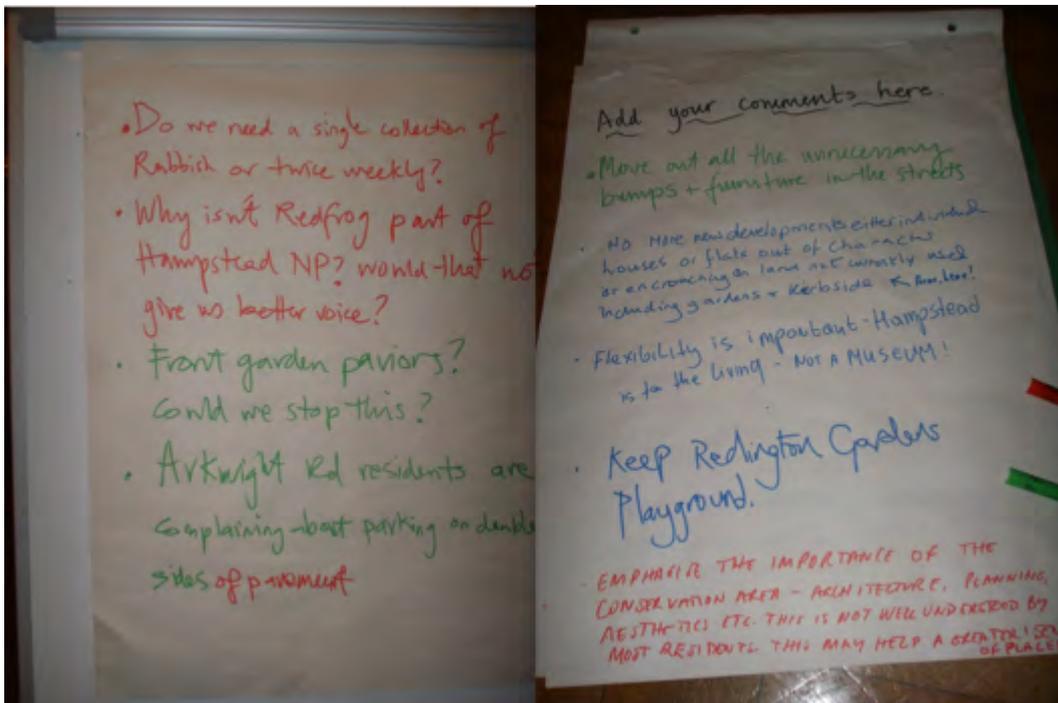
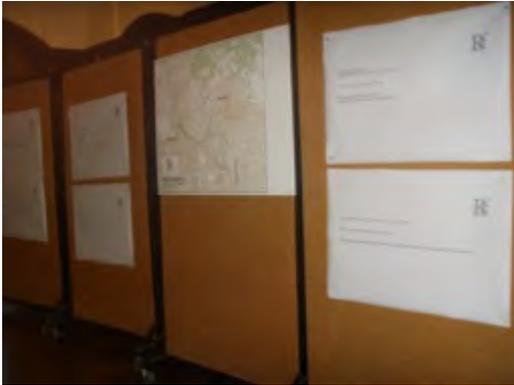


Approximately 80 people attended the first public consultation, held in the Refectory at University College School on Sunday 2 March, from 4 pm till 6 pm. All three ward councillors were present and all agreed the session was very successful. Starting as the intended drop-in session for the first half-hour, the meeting became a more formal but lively session involving all attendees for the remaining hour and a half, during which many questions were raised and answered by committee members with some discussion between residents.

A0 posters were displayed around the UCS refectory to welcome residents and inform them of the purpose of a neighbourhood plan. Two A1 maps of the proposed boundaries were displayed and 4 flip charts were made available for attendees to write comments.

Attendees were also asked to fill out their contact details and to state whether they agreed with the proposed boundaries. A total of 68 attendance forms were completed and incorporated into Red Frog's new database.

Residents stayed for the full two hours and participated in a one-and-half- hours Q&A session hosted by Redington Froggnal Association's Chairman and the Chair of Hampstead Conservation Area Advisory Committee, assisted by Cllrs. [REDACTED] and [REDACTED].



Add your comments here.

- We would like to keep the character of our streets intact.
- This will make the already difficult process of obtaining planning permission even more difficult!
- Less Rules → not MORE
- Control Traffic
- Prevent 2 Storey basements — Think long term impacts.

Add your comments here

- Please keep lorries away from our narrow streets. Recorded by Sam
- Stop HS2 Traffic coming through area.  
 Mean + High quota 100 HGV/day.
- ALL NEIGHBOURHOOD STREETS SHOULD HAVE 20 MPH SPEED LIMIT.
- FORBID ALL BASEMENT BUILDING Recorded by Jan

Add your comments here.

Please protect trees  
Windows 2000

- Subsidence problems Recorded by Jan  
 who will deal with?
- Dog ~~pass~~ collection?
- Where would cil money be spent on in the NP?
- 18-20 people want to help - have filled in the forms





## 2.3 Exploratory Research

An initial online survey was developed to learn about planning issues concerning local residents and businesses. Awareness of the survey was raised through flyers, lamp post notices and the 2.3.14 public consultation.

The initial survey asked 27 questions, scored on a scale of 1 to 5, where 5 indicated a high level of agreement, and two open-ended questions.

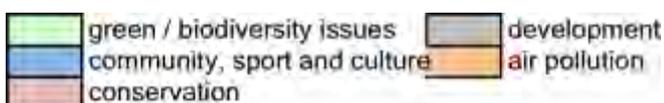
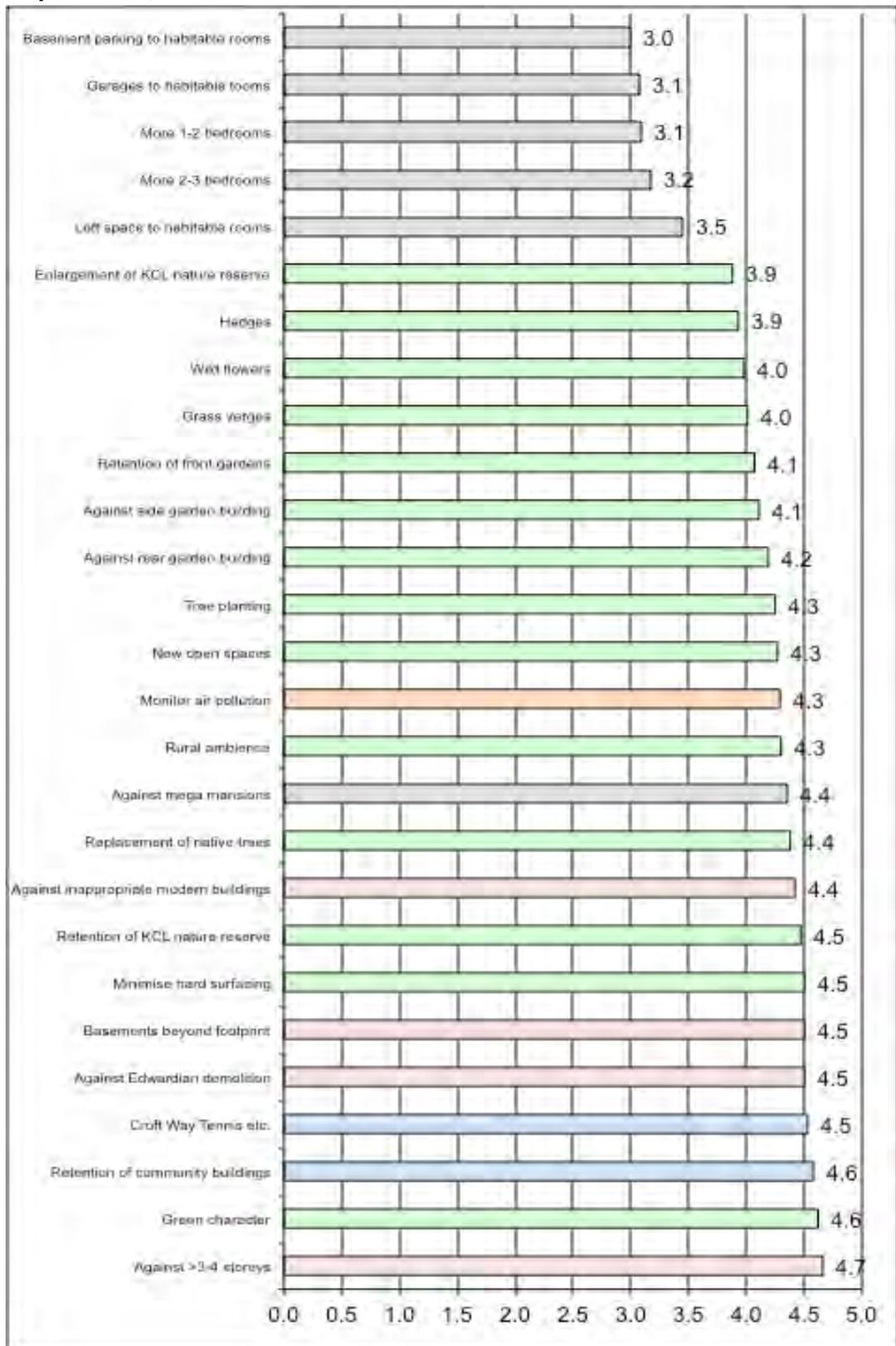
Of the 27 questions, 23 achieved a score of 3.5 or above. Those gaining the highest levels of support were incorporated into the subsequent Vision and Objectives survey.

RedFrog were keenly aware of the need for a neighbourhood forum to genuinely represent the views of the majority of the area's residents and for it to be inclusive.

By 31.3.14, Red Frog had received almost 100 responses to its on-line survey. Respondents to the on-line survey and consultation attendees were individually thanked and invited to join the Redington Froggnal Neighbourhood Forum.

All those on the developing RF database were invited by email, with a subsequent follow-up email, to attend the Neighbourhood Forum meeting on 1 May at 8 pm in Bay Hall, King's College, Kidderpore Avenue. All were sent a copy of the draft constitution.

**Redington Froggal Online Survey, based on 82 responses from 98 respondents, 25.4.14**





## Neighbourhood Plan Policies

### Contact details

1 / 1

Thank you for filling out this survey - there are just 13 questions!!

Please complete a questionnaire for each household member aged 18 and over.

Please note our email address: redfrogemail@gmail.com

### **1. Objective 1: To Preserve and Enhance the Redington Frogmal Conservation Area Characteristics**

Redington Frogmal is a designated Conservation Area. The Neighbourhood Plan will adopt design and conservation principles to preserve and enhance the characteristics of this “picturesque Edwardian suburb”.

The Neighbourhood Plan will incorporate a presumption against demolition. It is a condition that any new buildings are to respect existing rooflines, i.e. not greater than 3-4 storeys in height, with gaps between neighbouring buildings, with front and rear gardens and with a footprint which does not exceed the one it is replacing.

Front and rear gardens are to be maintained as green, soft-landscaped surfaces in their entirety. Side gardens are required, in order to preserve gaps between buildings and views to rear gardens and trees.

Front boundary treatments of low retaining walls and hedges are to be retained and, where lost, reinstated, as the opportunity arises.

Agree strongly

Agree

Don't know

Disagree

Do you agree that a objective to preserve and enhance the Conservation Area characteristics should be incorporated into the Neighbourhood Plan?

## 2. Objective 2: Greenery

The gardens, trees and hedges within Redington Froggnal constitute an important green lung, for the health and well being of residents. They also provide habitat for wildlife and form an important green corridor at ground and tree canopy level used by wildlife, linking Hampstead Cemetery and the King's College Site of Importance for Nature Conservation with Hampstead Heath.

The conservation area has suffered considerable loss of tree cover, private garden space and hedges over recent years.

There will be a presumption against conversion of front gardens to parking space. The Neighbourhood Plan will require the retention of soft surfacing and trees, taking all opportunities to expand the area of soft surfacing and amount of tree cover.

Private gardens and open space are to be maintained as habitat for birds and wildlife and a succession planting programme developed for the area's trees (private and street) and hedges, to ensure that greenery is retained.

Prospects for reinstating visible water courses will be examined, for example exposure of the rivers Westbourne, Kilburn and Tyburn.

These measures will aid biodiversity, help maintain a carbon sink, mitigate air pollution and surface water run-off, provide cooling and aid health and well being.

	Agree strongly	Agree	Don't know	Disagree
Do you agree that Greenery should be an objective for the Neighbourhood Plan?				

## 3. Objective 3: Enhancement of the Environment of Finchley Road

The Neighbourhood Plan will seek to promote safer conditions for pedestrians and cyclists. The planned construction by TfL of Cycle Superhighway 11 between Swiss Cottage and Hendon Way provides a key opportunity to promote community cohesion and mitigate some of the destructive impacts from six lanes of traffic.

The Neighbourhood Plan will require any planning application to include landscaping, physical improvements and greening measures, in order to provide shade to pedestrians and cyclists and to help filter vehicle pollutants. Specific measures to be sought will include:

**i. Construction of a trench between the road and the pavement for laying a common utilities duct, in order to enable tree planting**

**ii. Prioritisation of walkability and the provision of wide, tree-lined, pedestrian-friendly pavements with good-quality street furniture, even pavements and the removal of unnecessary railings**

**iii. Control of traffic speeds and encouragement for HGVs to use the road at night, rather than during the day**

These actions will facilitate the development of Finchley Road as a community resource, promote the growth of pedestrian traffic and will benefit both Finchley Road residents and traders.

	Agree strongly	Agree	Don't know	Disagree
Do you agree that the Neighbourhood Plan should incorporate an objective to enhance the environment of Finchley Road?				

#### **4. Objective 4: Sustainable Growth in Redington Froggnal Conservation Area.**

A neighbourhood plan is required to support sustainable growth of homes and jobs.

Residential Growth: Camden's Local Development Framework policy identifies a "very high" need for properties with two bedrooms (Development Policy 5.4).

The Neighbourhood Plan will incorporate a presumption against the loss of dwellings through the conversion of two or more flats into a single dwelling.

Community space is required to meet the needs of: the large-scale residential developments under construction on Finchley Road and in Kidderpore Avenue; the growth of the elderly population and the population of home workers. The Neighbourhood Plan will seek to meet the need for a civic community facility through the designation of the White House in Kidderpore Avenue as a civic community facility.

The opportunity to create Pocket Parks, new woodland and green verges will be taken whenever possible.

Business Growth: many properties in the section of Finchley Road between Arkwright Road and Froggnal are characterised by retail or service use at ground-floor level.

Improvements to the public realm at Hampstead Gate will also be sought.

The Neighbourhood Plan will seek to promote business growth by driving Finchley Road footfall through greening measures and a cleaner street environment.

Home working will also be promoted.

	Agree strongly	Agree	Don't know	Disagree
Do you agree with this objective for sustainable growth of homes and businesses, along with the development of pocket parks and community space, for inclusion in the Neighbourhood Plan?				

## 5. Objective 5: Redington Frogna Conservation Area as Centre for Tertiary Education, the Arts and Culture

Sub Area Three has a history as an important centre for tertiary education, the arts and culture: King's College London; Queen Mary and Westfield College; Hampstead School of Art; Craxton Studios in Kidderpore Avenue. Further examples are found in Frogna Lane: Florian Leonhard Fine Violins; and in Arkwright Road: Camden Arts Centre.

These are important and established community facilities and are consistent with the cultural interests of residents. They offer the opportunity to maintain the area's tradition of adult education and are a potential venue for music concerts.

Redington Frogna Neighbourhood Plan will seek to replace any loss of this traditional use, to maintain a community balance and to promote the development of community space in a ward where home working is on the increase and where there are many elderly residents.

The designation of the White House in Kidderpore Avenue as a civic community facility will help address this need.

	Agree strongly	Agree	Don't know	Disagree
Do you agree that an objective to retain the area as a centre for				

tertiary education,  
the arts and culture  
should be  
incorporated into the  
Neighbourhood  
Plan?

## 6. Objective 6: Creating New, Green Public Realm

A high quality and green public realm is important to well being and also to promote a sense of civic pride.

This will be achieved by retaining open space for the benefit of all residents and by taking opportunities to develop local green space, new woodland and pocket parks. The existing Borough Grade II Site of Importance for Nature Conservation is to be preserved and enhanced for the benefit of wildlife.

Where the width allows, pavements will incorporate: grass / wildflower verges and shrubbery; and the provision of benches, particularly on streets with a steep gradient.

The greening of neglected areas, such as Hampstead Gate, will be promoted, and of the land around the covered water reservoir in Platts Lane.

Civic pride is to be promoted through Conservation Area signage and wall plaques commemorating famous residents and architects.

Agree strongly

Agree

Don't know

Disagree

Do you agree that an  
objective to create  
new, green public  
realm should be  
incorporated into the  
Neighbourhood  
Plan?

## 7. Objective 7: Basement Excavation

The Redington Froggnal Conservation Area is situated in Claygate Member and Bagshot Formation in which aquifers are present. Basement excavation causes irreversible change to the water pressures in the ground.

Many residents are concerned about the fashion for basement excavation, which can leave neighbours with severe structural problems for many years. Basement

development invariably results in loss of soft landscape, endangers trees, can exacerbate surface water flooding, while attendant lightwells create unwelcome light pollution.

The Neighbourhood Plan will require full planning permission to be sought for all basement development, to be accompanied by full geological and technical surveys, including long-term monitoring of water levels and a prediction of the ground movement that is likely to accompany the excavation and an assessment of the time over which those movements are likely to occur.

Basements will be required to be contained within the footprint of the original dwelling, in order to avoid garden take-up.

They are to be no more than one storey deep (i.e. the excavation is to extend less than 3.5 metres below ground), in order to minimise interference with the water table.

Agree strongly

Agree

Don't know

Disagree

Do you agree that a policy to require full planning permission for all basement development and that they should be contained within the footprint of the original dwelling and be no more than one storey deep, should be incorporated as policy into the Neighbourhood Plan?

\*8. Email address

9. Telephone number

\*10. Street address

\*11. Respondents should be statistically representative of the Fitzjohn's and Frogna! ward. Please would you mind stating your age group

Under 30

30-44

45-59

60-74

75+

\*12. And household composition - how many people live in your household?

\*13. Do any members of your household work from home within the Redington Frogna! Conservation Area?

Yes: 1 person

Yes: 2 people

Yes: 3 or more people

No

Done

Powered by **SurveyMonkey**  
Check out our [sample surveys](#) and create your own now!

### 3. DEVELOPING THE MEMBERSHIP DATABASE

**1.5.14 Neighbourhood Forum meeting** at 8 pm in Bay Hall, King's College, Kidderpore Avenue

The inaugural meeting of the Redington Frogna! Neighbourhood Forum was held on 1 May at 8 pm in Bay Hall at King's College. The meeting was attended by all three ward councillors, but achieved a relatively low turn-out among residents, with just 21 attendees and 10 apologies.

It was reported that Camden officers had submitted a recommendation for approval of both the Area application and the Forum designation. A draft constitution had been

emailed to all on the database in advance of the meeting. Attendees were provided with hard copies of the draft constitution, together with the results of the initial online survey and Camden's reworked map of the Red Frog CA Neighbourhood Plan boundaries. The draft constitution was then proposed by Alan Sanders, seconded by and approved unanimously by a show of hands.

3.1 Working groups were formed around key themes arising from the initial online survey and to help Camden to update the Redington Froggnal Conservation Area Statement and Guidelines.

#### **3.5.14 Meeting with Sheikh Dr. Muhammad al-Hussaini, Council of Imams and Rabbis of the UK and Secretary Camden Faith Communities Partnership**

On 3 May 2014, representatives from Redington Froggnal Neighbourhood Forum and Hampstead Neighbourhood Forum met Sheikh Dr. Muhammad al-Hussaini, Council of Imams and Rabbis of the UK and Secretary Camden Faith Communities Partnership, to enquire about involving religious establishments. It was explained that the congregation at the two Redington Froggnal churches tends to be drawn from West Hampstead, while Jewish residents in Redington Froggnal may visit the two West Hampstead Reform synagogues and other synagogues beyond the Forum Area.

#### **10.9.14 Meeting with Caroline Birchall, Camden's Nature Conservation Officer**

A meeting at the Borough Grade II Site of Interest for Nature Conservation in Kidderpore Avenue has been arranged to draw the Council's attention to this important area of biodiverse green space.

#### **7.12.14 Christmas Bazaar at Hampstead School of Art**

A joint Christmas Bazaar, hosted at Hampstead School of Art, was organised to promote awareness of the Neighbourhood Forum, through the display of leaflets. Cllr [REDACTED] manned a stall to guess the key to no. 10. Two new members were added to the Forum database. Other visitors, however, did not live within the Neighbourhood area.

#### **21.1.15 Meeting with Mount Anvil at 5 pm at Upper Skeele Hall, King's College**

Following the sale by King's College London of its North site to Mount Anvil, RedFrog arranged a meeting with Mount Anvil and nearby residents.

This was a well-attended meeting and yielded 26 new members for the Forum database, while also establishing relations between the Forum and Mount Anvil and its Design and Planning Director, [REDACTED].

The Neighbourhood Forum was publicised through the display of leaflets

#### **31.1.15 Attendance at Lindfield and Langland Neighbourhood Association (LLNA) party**

A member of the RedFrog Forum Committee attended the LLNA party, gaining eleven new members for the Forum database.

The Neighbourhood Forum was publicised through the display of leaflets

#### **19.2.15 Planning application 2015/0544/P**

An alert circulated in respect of planning application 2015/0544/P for a night club on Finchley Rd, generated interest from members in Arkwright Road Mansions and Arkwright Road.

#### **24.2.15 RedFrog meeting at St. Luke's Church, Kidderpore Avenue with TfL to discuss the proposed construction of CS11.**

On 12 February, an invitation was emailed to over 200 database members to advise them of a meeting to learn about TfL's plans for CS11. The meeting, arranged by the Forum Committee, provided TfL with an opportunity to outline its ideas for the scheme and enables residents to offer some initial feedback. The 34 attendees included two ward councillors and two members of staff from TfL.

The Neighbourhood Forum was publicised through the display of leaflets at the Xmas Bazaar (7.2.14), at the Mount Anvil public exhibition (31.1.15) and at the TfL public meeting (24.2.15)

#### **4.6.15 RedFrog Neighbourhood Forum meeting, held at 7 pm at St. John's Church, Church Row**

The meeting was chaired by Cllr. [REDACTED] with 22 attendees present. Cllr [REDACTED] led the meeting and explained the purpose of the Neighbourhood Forum, as set out in the Constitution and that it exists to promote Edwardian architecture and biodiversity etc.

## Email circular to Forum database



AGM 2015

Dear Resident

On THURSDAY 4TH JUNE 2015 we shall be holding the AGM of the Redington Frogna Association (Redfrog) followed by the AGM of the Redington Frogna Neighbourhood Forum. The start time is 7.00 pm and we expect to finish both AGMs by 8.30 pm.

Please note change of venue: ST JOHN'S CHURCH, CHURCH ROW, NW3

### Redfrog Membership Records

Prior to the AGM our membership records should be updated.. Membership allows you to vote at the AGM and carries a theoretical liability of £1 should Redfrog ever be wound up.

### Redfrog Election of Officers

It is open to every member to be nominated for election

At this election our current Chair Farokh Kharooshi and Vice-Chair Dudley Leigh will stand down and Rupert McNeil and Rob Hagemans are proposed by them as joint chairs,

### Neighbourhood Forum Election of Committee

The main business of the Neighbourhood Forum AGM will be the election of a Committee who will appoint a Chair and sub-committee to carry out the functions of the Neighbourhood Forum.

The committee has to be elected annually by the members. Any resident or local business or other local organisation is entitled to a vote as a member. There should be at least 21 people on the committee, although most of the day to day work will be carried out by sub-committees appointed for the purpose.

PLEASE CONFIRM BY REPLY TO THIS EMAIL IF YOU ARE WILLING TO BE NOMINATED AS A COMMITTEE MEMBER FOR ELECTION AT THE AGM.

Look forward to seeing you on 4th June.

## August 2015 Neighbourhood Forum Website developed

3.15 A dedicated Neighbourhood Forum website, developed by a volunteer, became live in August 2015 (<https://rfforum.wordpress.com>). Viewing statistics are shown below.

## Views per month

### 2015

August	28
September	225
October	166
November	145
December	163

### 2016

January	277
February	222
March	56
April	102
May	133
June	257
July	291
August	237
September	135
October	114
November	121
December	104

### 2017

January	116
February	32
March	59
April	70
May	72
June	131
July	62
August	166
September	171
October	78
November	90
December	106

### 2018

January	63
February	23
March	43
April	49
May	51
June	59
July	38
August	74
September	51

# Redfrog neighbourhood forum

Redfrog neighbourhood forum

[ABOUT](#) [COMMITTEE](#) [CONTACT](#) [EVENTS](#) [Evidence Base](#) [FORUM AREA](#) [FORUM HISTORY](#)  
[GARDEN WILDLIFE SURVEY](#) [INITIATIVES](#)



## REDINGTONFROGNAL NEIGHBOURHOODFORUM

### ABOUT

Neighbourhood Forums are community based groups designated to take forward neighbourhood planning in areas without a parish council. It is the role of the local planning authority to agree who should be the Neighbourhood Forum for the neighbourhood area.

**Redfrog Conservation Neighbourhood Forum** is now recognised as the Neighbourhood Forum for the Redington Froggnal area under Localism Legislation. It is tasked with developing a Local Plan which will inform Camden's planning decision for the area.

The **Redington Froggnal Association** has been the guiding force in setting up and continuing to support the Forum.

Our vision is a set of principles developed by Redfrog residents to help Camden implement and change its policy according to the needs of our local community. We seek a future for the Redfrog area which preserves its green character and continues to make it home to a wide range of family types and ages.

A grant has been secured from Locality to help fund part of the evidence base needed, and we are engaging with AECOM.

We believe that the Redfrog neighbourhood should celebrate its heritage and history and should continue to be a delightful area to live in.

REDINGTONFROGNAL  
NEIGHBOURHOODFORUM

[.wordpress.com](#) in a new tab

1000 1000

### 14.11.15 Jazz and Quennell Social Event at Craxton Studios, Kidderpore Avenue.

3.17 The evening included free champagne and canapés and live music and a presentation on the work of CHB Quennell, architect of many of the Forum Area's heritage assets. The event attracted nearly 100 Forum members and provided an opportunity to again draw attention to the Neighbourhood Plan under development.

3.18 The occasion was publicised through lamp post notices (below) and an email circular, resulting in the addition of 33 new members to the Forum database.

#### Jazz and Quennell Lamp Post Notice

REDINGTONFROGNAL  
NEIGHBOURHOODFORUM

INVITATION  
Jazz and Quennell

*Join us at an anniversary celebration of  
CHB Quennell, the architect responsible for  
so many of the lovely houses in the  
Redfrog Conservation Area.*

Venue Craxton Studios, 14 Kidderpore Avenue

Date Saturday 14<sup>th</sup> November 2015

Time 5pm – 7pm

This is a FREE event, with champagne and canapés.  
We should especially like to welcome residents from the many  
Quennell designed houses in the Crofts.  
There will also be an opportunity to view the first output for the new  
Community Neighbourhood Plan.

RSVP by 24th October to [redfrogemail@grtmail.com](mailto:redfrogemail@grtmail.com) so that we can  
plan for catering.

Talk on Quennell  
Music by Glenwood Jazz



<https://rforum.wordpress.com/>

### **13.6.16 Neighbourhood Forum AGM and Presentation of First Policies Draft.**

Held at 9 pm on Monday 13th June 2016 at St Andrew's Church, Frogna Lane, NW3 (NB this was a change of venue from JW3).

Flyers advising of the first draft of the Neighbourhood Plan Policies and the Forum's AGM were delivered to all 2,000 letterboxes in the Forum Area. Mount Anvil provided refreshments and video recording for the presentation by Create Streets of the first draft of the Neighbourhood Plan policies, which was followed by a Q&A session, which is summarised below.

#### **REDINGTON FROGNAL NEIGHBOURHOOD FORUM**

**You are invited to a presentation of the draft Redington Frogna Neighbourhood Plan Policies.** The presentation will be followed by the AGM.

**The aim is to provide residents and local businesses with an opportunity to learn about plans for the area and to provide feedback to be incorporated within the Neighbourhood Plan.**

**The purpose of the Plan is to sustain the character of the Conservation Area, while at the same time allowing for development and growth, if it is sympathetic to the character of the area.**

**When: MONDAY 13<sup>TH</sup> JUNE, 7.30 PM**

**Where: JW3 THEATRE, 341-351 FINCHLEY RD, LONDON NW3 6ET**

**Without a Neighbourhood Plan, Camden's ability to reject unsuitable development proposals is severely limited. Camden will hold a referendum on the Plan, later this year.**

**RSVP: to [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com) by Monday 6<sup>th</sup> June.  
<https://rfforum.wordpress.com>**

## Summary by Create Street of Key Queries Arising During 13.6.16 Presentation



Create Streets  
We can help you make better places

### Questions arising from Redington Frognal Policies presentation, June 13<sup>th</sup> 2016

These are responses to questions where we wanted to check on statute or formal guidance before giving absolutely specific answers. Questions related to the wording, meaning or nature of specific policies have been noted but will be addressed once all responses to the presentation on June 13<sup>th</sup> and its circulated notes have been received, collated and compared.

#### 1) Some members were frustrated at the absence of policies on increasing the number schools and GP surgeries.

- A. There are some policies on schools (for example on requirements for School Travel Plans) but mostly these issues of this does not fall within the remit of the Neighbourhood Plan – such as a cap on student rolls. “
- B. For more guidance on this see advice from Locality [here](#):

#### 2) Does the plan explicitly endorse or attempt to block the TFL cycle Superhighway 11 through the area?

- A. Neighbourhood Plans may only refer to planning permissions sought in the area and the Cycle Superhighway is outside the Neighbourhood Area
- B. In addition, the current judgement on Cycle Superhighways is that they are "works of improvement" and do not need planning permission. This was established in court a case in January 2016 between the Licensed Taxi Drivers' Association and TfL.
- C. The draft plan as it stands seeks contributions towards cycling provisions from developers – but not the construction of them (this would not be possible in a Neighbourhood Plan anyway.) It holds no position on the Cycle Superhighway itself. We do not believe that the draft plan could be taken to influence the Cycle Superhighway one way or another.

#### 3) Q: Why is the Basements policy not outlined?

- A. The reasons and intentions behind the Basements Policy have been outlined in line with decisions reached during earlier workshops and consultations. They are as outlined in the Neighbourhood Forum's Vision and Objectives that
  - i) *'The Redington Frognal Neighbourhood area is situated in Claygate Member and Bagshot Formation in which aquifers are present. Basement excavation causes irreversible change to the water pressures in the ground. Basement development beyond the building footprint results in loss of green space, endangers trees and can exacerbate surface water flooding.'*

Create Streets Ltd company number: 08332263

## Comments received by email to RedFrog

### **Queries Arising from 13 June Presentation by Create Streets.**

#### Affordable housing

The basis for the allocation of 50% affordable housing was queried. It was suggested that such a high proportion for affordable housing would lead to buildings of greater bulk and scale.

#### Community facilities

I think it was questioned whether Hampstead School of Art is in fact a community facility (or is it a private school?).

#### Schools

Can we introduce a cap on pupil rolls for the two schools in the Forum area. [NM comment: this is likely to be inconsistent with the needs of a growing population. St. Luke's School has made a very strong case for additional school places].

Could we also have a Policy requiring School Travel Plans to be enforced.

#### Construction management plans

The Policy on Construction Management Plans should include a provision for the developer to allocate a sum of money, to be used for the professional supervision of the CMP on behalf of affected residents.

#### Property "refurbishment" and individual householders

Would the draft Policies make it more difficult for individual householders to gain planning permission?

At what point will the requirements for a Tree and Hedge Survey, Design and Access Statements, reversal of front garden loss etc. be triggered?

[NM comment: My suggestion would be that the requirement for a tree and hedge survey and a design and access statement should be triggered by applications for extensions, crossovers and garden buildings.]

#### Cycle Superhighway 11

The Policy on Cycling should not provide TfL or Camden with ammunition to argue that the Plan supports the introduction of CS11, as residents are concerned that CS11 would increase commuter rat-running.

#### Decluttering policy

Is it possible to include a policy on decluttering of street furniture. [NM comment: But residents want new benches and provision of Conservation Area signage].

#### Mobile telephone equipment

Need to introduce a Policy on this.

NOI comment: must anticipate the introduction of 5G mobile telephony, where local authorities develop mesh networks, utilising street furniture.

Claire Gasson re D&A Statements: 14.6.16 by email

It is already complicated and expensive to submit a planning application with D & A statements, arboricultural reports, flood risk assessments, construction management plans etc. If you seek, with very worthwhile intentions, to add to the reports associated with planning applications, perhaps there could be clear guidance as to when these would and when they would not be required. At what point does a proposed scheme trigger the need for them, so they are only asked for when relevant.

Secondly, I am interested in how your design code could apply to all the different types and styles of buildings in our area and how it would impact prospective new building. I would very much like to give you feedback of what is produced by Aecom from the point of view of someone who might use the guide, if that would be acceptable to the forum.

**NM reply:** I don't think we are seeking to increase the burden on applicants, but rather to change the focus of these reports. At Hampstead Conservation Area Advisory Committee, for example, we often find that design and access statements serve merely to obfuscate so, instead of including all sort of irrelevant facts, we thought it would be more useful if the applicant / developer were instead to consider how the proposals might contribute to the enhancement of biodiversity, for example. Similarly, instead of an Arboricultural Assessment, which divides trees into A to E categories, the Assessment could instead refer to the trees' ability to support insect species and lichens.

The trigger for such assessments would be as at present, eg for property extensions, garden buildings and crossovers.

We shall appreciate your feedback on AECOM's design codes. The plan is that they will afford sufficient flexibility and be capable of tailoring by building type and Conservation Sub Area. We shall also be receiving feedback from the HCAAC Chairs, John and Mojgan (copied).

Please keep in touch and do continue to raise concerns.

■■■■■ reply: 15.6.16 by email

Thank you ■■■■■ your comments on D&A statements show how thoughtful you have all been with this.

Please let me know if I can be of help & I appreciate being given the opportunity to look at the design code. I am really interested to see what Aecom come back with.

■■■■■ email: 22.6.16.

Apologies that I cannot make 30th June

I think Sihban's point about including the necessity for all schools to have a travel plan is important.

■■

■■■■■

Thank you for the feedback. We can only comment in relation to the three schools in our area (UCS, St. Margaret's and St. Luke's), and we do have this as a Policy and have even extended it to adult education. I wonder if it should also include churches and UCS Active?

Best wishes,

[REDACTED]

[REDACTED]

13:47  
(28  
minutes  
ago)

to me

Good idea to include UCS active, as they were only supposed to give membership to people within a mile, who could walk there, but I enquired about parking, and they told me it was no problem to park in the surrounding streets !!

Churches - I am not sure about - weddings, funerals.....'one offs'

Val

[REDACTED] <JG@MRB-BOOKS.CO.UK>

11:51  
23.6.1  
6

[REDACTED]

Many thanks for the email. I notice that I was not included in the attendees. It was probably my fault. I may not have signed in.

I must say that I was very disappointed with the Create Streets presentation. Too many of their suggestions were very 'pedestrian' and any developer would run rings around their ideas. I hope that the final report can be very much sharper.

Kindest Regards

[REDACTED]

23.6.16 Dear [REDACTED]

I was sorry not to be able to stay for the AGM following the presentation, which I thought showed a lot of progress.

I don't know what formal status the neighbourhood plan will have in relation to Finchley Road - probably very little and in any case we could not do much in practice if TfL ignore it. However it may give us a bit of leverage.

I am afraid I shall be away on 14th July but I should like to continue to be involved with the Forum.

Best wishes

Irving

26.6.16 Email from [REDACTED]

Hi [REDACTED] some corrections in red, comments, and also some questions. Let me ask the questions first for easy reference:

1. Open Land - I have noticed that various bits of land have been requested to be designated as open spaces. In the rear of 17 Frognal there is some woodland (3400 sq ft) between our garden and Hampstead Gate that the owner (unconnected with the flats in the main house) has been trying to sell as development land. All 7 trees in the woodland are protected but now having seen these other entries, I am wondering if it is worth submitting this also? However, it will be against the will of the owner, so not sure how that works. The owner bought the land in 1967 for £8k if that is relevant.

2. Flooding/ Basements - Has the Arup report included updates received from residents re soggy gardens that could indicate a spring/ underground river? I say this because the Arup document I saw does not include the lower part of Frognal but from the soggy gardens in lower Frognal it would seem the underground stream does continue from that shown shown in the document at Frognal/ Arkwright.

Comments:

Aspirational Sites - Hampstead Gate

Currently offices - a number of separate freeholds and leaseholds for the individual buildings within the site would complicate future purchase of the entire site by prospective developers.

Aspirational Site - r/o 166-200 Finchley Road - It is unclear if the buildings being referred to are fronting Finchley Road directly, or buildings immediately behind the buildings in Finchley Road - I think this should be clearer. It reads like you are talking about the buildings on the Finchley Road, but the title is 'rear/of'. Also it is immediately adjacent to Hampstead Gate and they share an access from Frognal, so I think there should be mutual references and they should also be placed in the plan so they are consecutive.

typo in photo caption:

*Figure 6: Photo of (part of) Area behind 166-200 Finchley Road*

R/o 27a Frognal

Two of the garages (the ones with blue stencilling on the doors) are the subject of a planning application (2015/6231/P). It is subject to local objection although H&H Soc seem ok with it apart from a couple of issues.

It is still undecided. The same owner also owns 29 Arkwright Road (in same alleyway) and applied to build 2 houses in a rear garden. This met with outrage and was withdrawn (2015/6216/P).

I am not sure of the protocol here but it seems not the right thing to reference a current application as an aspirational site. The other 4 garages have a separate owner and are not subject to any application, but all objections have mentioned tight access for construction traffic, increased use of alley and traffic etc.

I will leave that one with you!!

HD4 and HD5 have some repeated wording re noise/ vibration - dont know if intentional.

Page 26, typo in penultimate line within blue box

Page 29 typo in second line of blue box ('original')

There are a number of other typos, but these should be picked up by Spellcheck (the two above wont be as the text is in a pasted picture.)

Page 36, third para, third line should be 'exaggerated', not 'exasperated'

page 45 bottom para

word missing

As outlined in the Visions & Objectives Statement, Sub Area Three has a history as an important centre for tertiary education, the arts and culture, and the following key sites are have been or are still located therein Kldderopore Avenue; King's College London; Spiro Institute / London Jewish Cultural Centre; Hampstead

Overall I would say that there is some repetition of paragraphs, data, or points through the document. I dont know if some of the same things have to be repeated under different settings - I have mentioned a couple above, but there are more. I am happy to review any revision further if you wish.

Apart from those minor things it was a good articulation of the area's needs and I think it provides also some flexibility re high quality modern design which whilst is not always going to appeal to all is a feature of the area, we have to admit.

All best wishes,

[REDACTED]

27.6.16

[REDACTED] MICHAEL@HUBBS.CO.UK

Dear all

I think overall if the gardens were nominated green space and the woodland was not then this will be worse than at present as a developer could argue that the surrounding green area was protected and so an infill development should be permitted as nothing else would be built around it.

Additionally if we needed to have a public battle with signatures etc then this will make more people aware of the plot and therefore increase the chance of it being sold.

Whilst I will need to discuss with my fellow freehold director, my conclusion is to let sleeping dogs lie and do nothing however if you disagree then happy to have a discussion.

Many thanks,

[REDACTED]

28.6.16

Hi [REDACTED]

Good morning,

I have read through the draft document and have a few observations:

1. It appears to do what it sets out to do, Namely to follow the local and national guidelines for a Neighbourhood Plan and then setting out the logical framework for the RedFrog plan.
2. There are a few typos and spelling corrections – nothing major (mostly down to cutting and pasting from different sources).

3. The only issue (as an enforceable document) that I see is that there is no clear distinction between a commercial developer and a residential (family) refurbishment. This may be intended, but the Plan seems aimed at commercial developers in most cases but has plenty of language aimed at residential family refurbishments. I wonder whether it would be more clear if a distinction is made between the two? For instance: the Plan as a whole can apply to commercial developers and then certain sections can be directed to apply to residential refurbishments as well.

4. I would echo some of the comments in the recent Forum meeting where residents suggested that a mix of architectural styles should be supported. The document does not do this, and rather uses the general language of "good development". Policy needs to be general (of course); and the subjective language of good development could be useful to the planners in deciding what to permit and what to reject. Equally, it could mean that it's too subjective and is arguable at every case. Tricky one this.

5. I was not able to amend the small policy text boxes – I think they are in the nature of photos.

6. I have a few more amendments to make. I will send my revised version to you this week.

All the best

29.6.16 I am so sorry that I could not make the '30th June option'. Please count my vote to re-elect [REDACTED] as chair. I have given [REDACTED] my suggestion on 'school travel plans' being noted.

Looking forward to next stage.

[REDACTED]

#### **14.7.16 Informal public consultation on first Policies draft, held at JW3**

This event was arranged to seek feedback on the first draft of the Neighbourhood Plan policies by Create Streets, which had been presented to the Neighbourhood Forum AGM on 13 June. The draft Policies were displayed on A3 posters, with Forum Committee members on hand to seek feedback and respond to queries.

#### **Paper feedback forms received**

## BG1: Biodiversity and Green Infrastructure Comments

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### BG1 Policy Rear Gardens

Should we refer to swimming pools and garden buildings, as well as the impact of underground development on gardens and how they should be managed -as outbuildings are often used as a sneaky way to reduce green space

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### BG1 2: Front Boundary Treatments and Front Gardens

Photos - the collages do not work - suggest instead examples of good and bad.

Whilst I agree with the thinking I think we need to acknowledge that a level of hardstanding/carriageways was part of the design of some of the bigger houses. We should specify materials for hardstanding (eg permeable ) and that there should be a degree of separation between the garden and the hardstanding e.g. a green strip to enable run off



Where there is hardstanding - cars should not be parked in front of the house as it spoils the setting.

Can we require people to improve poor hardstanding as part of a larger planning applications

There is no mention of light wells or the impact of driveways on pavements

and street trees

Do we need to say anything about bins and rubbish storage as that has changed over the years and the size of bins and number can be unsightly

How about front paths and the materials used? Height and material of gates...



acceptable light well

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### BG1: 3

The blurb is very generic and instead should reflect the history of buildings and trees in RedFrog for example many roads names reflect the existence of historic trees

eg Templewood  
Oakhill  
Kidderpore Avenue

Can we mention veteran trees and the diversity value of veterans

The number of trees felled is underestimated - we have lost over 100 trees from Platts, Clorane and Kidderpore alone

### **BG1: 3 Tree Planting**

Should this also include tree maintenance - can we specify that felling and maintenance should follow best practice guidelines (too many tree surgeons who just hack away at trees)

Replanting - should reflect the trees that would have originally been used in an Edwardian Suburb (as per our NP objective)

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#### BG 1: 4 Light Pollution

This is also about retaining our historic architectural detail as well as bio-diversity

Suggest inclusion of the following

- Light fittings should be chosen to blend with the architectural detail and positioned in unobtrusive locations
- Garden lighting should be modest
- Floodlighting is a no no as is blue lighting (highly detrimental to wild life)
- Any illuminated signs including house numbers - are not in keeping



example of illuminated sign at Clorane Gardens



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#### BG 1: 5 Local Green Space

LG 6 Should green space at the front and to the side of Studholme included - think it is but the visual is confusing.

Do we need a specific policy on green spaces?

### Transport - ST1

Other Neighbourhood Plans (eg Highgate) include specific policies on Transport which cover issues such as Parking, Dropped Kerbs and Crossings as well as the Movement of Heavy Goods.

We need to cover these in our own Neighbourhood plan.

The plan lacks an assessment of the current parking and transport issues which we know is a big concern for residents.

Commuter parking, rat runs, road rage and the impact of development on street parking all need to be addressed.

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### Example Highgate Policy TR3: Minimising the Impact of Traffic Arising from New Development

New development defined as significant in size (ten or more units in the case of residential units) will be expected to demonstrate the following:

1. Regarding movements to, from and within the site, including links to existing transport networks, proposals will be expected to make appropriate connections to highways and street spaces;
2. Where developments are likely to involve a significant number of visitors arriving and leaving in cars, taxis, goods deliveries and coaches, or it is a significant residential development, submitted proposals should show how these can be accommodated without harm. Proposals should provide information – including a parking survey (details in Appendix 2 on Forum website) – to indicate the availability of local parking. The likely impacts of the development on surrounding transport systems and the steps that will be taken to mitigate those impacts, for example using transport assessments and travel plans, can then be assessed against an agreed baseline; and
3. Developments should provide appropriate arrangements – where possible – within the site for pick-ups, drop offs and waiting areas for essential private vehicle users to ensure safe access for the site users, as well as other users around the site, and to reduce congestion

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### Pavements and Pedestrians ST 3

The preamble to the Policy ST 3: Pavements and Pedestrians does not include an assessment of the current state of pavements in RedFrog - which is very variable and in some cases pedestrian and wheel chair access is difficult.

Pavements have deteriorated as a result of vehicle crossovers which have been completed in inconsistent and uneven paving (some of which is difficult to walk on). The size and number of these crossovers make walking challenging e.g. Ferncroft. In addition after basement work - pavements stones have not been restored e.g. Briardale Gardens photo below. This all has a detrimental impact on the streetscape.

The preamble does not include an assessment of street clutter or signage.

As lovely little walk ways are a feature of the area - should we not mention them - preserving them and the original street lighting. I suggest these are listed.

The policy could also include:

- Resisting off street parking which lowers the kerb and prevents pedestrians passing
- Replacement of paving stones in keeping with the street.
- or separate kerb and crossover policy (see Highgate example)

The policy application could include an audit of the current state of pavements with a plan to improve



**Example of pavement in Briardale which has not been replaced following development**

### Example Highgate Policy TR5: Dropped Kerbs and Cross-overs

Where planning permission is required, planning applications for the provision of off-street parking accessible by dropped kerbs will not be supported in areas covered by a CPZ. They will only be supported where it can be demonstrated that:

- i. They are either not in areas of high parking stress or a CPZ, or they are in areas of high parking stress but will alleviate the demand for on-street parking through the provision of off-street parking for more than one existing dwelling, and
- ii. They would not negatively impact on the character of the area, particularly conservation areas (such as through the proposed removal of character enhancers such as walls and trees); and
- iii. They would not have a negative impact on pedestrian and highways safety; and
- iv. Appropriate on-site drainage, such as permeable surfaces, achieving run off rates which are no greater than the existing situation, and wherever possible are reduced, so as to mitigate against off-site flooding caused by run-off from off street parking schemes.

### Enhancement to the Environment of the Finchley Road

There is no assessment of the current state of the Finchley Road and the businesses and homes that front onto it.

The Plan as a whole ignores the business that exist in RedFrog, and Policy LC 4 might be an opportunity to address this.

Policy LC 4: seems vague and non specific

e.g. Corporate retain signage must sensitively adapt to the streetscape - not sure what that means as the current streetscape is poor quality

Do we need to be more specific for example

- Projecting Signs
- Sub dividing Glass Fronts
- External Street Shutters

What about residential development on the Finchley Road which has a high potential to be detrimental e.g. Barratt

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## Air Pollution

This policy is a mixture between Construction Management and Air Pollution. There needs to be a separate policy on Sustainable Construction Management which encompasses engagement with the community and neighbours as well as advanced sustainable construction measures such as off site construction.

Could the Air Pollution Policy be combined with Noise Vibration.

# REDINGTONFROGNAL NEIGHBOURHOODFORUM

## GIVE US YOUR FEEDBACK

Thank you very much for joining us this evening. We would welcome your feedback on the draft Neighbourhood Plan Policies.

These policies are designed to protect the RedFrog area from unsuitable development unfortunately, being a Conservation Area is no longer sufficient. This is an opportunity for residents and businesses within RedFrog to help shape the future development and growth of our neighbourhood.

Please use this form to give us **ALL** your views, the things you like, anything you think that should be changed and anything we should include. We will use your feedback to inform the RedFrog Plan.

Please tell us about you

Yo

ae

London NW3 7PB

Postcode

Intersune .com

NW3

**Policy HD1: Housing and Development**

I support the policy

**Policy HD2: Design Codes for Development Sites**

**Policy HD3: Design and Access Statements**

+ DAS: In principle I support, however.  
DAS: for small developments such requirements  
may be excessive

**Policy HD4: Air Pollution**

Clear air in Luder is most  
important

**Policy BG1 2: Green Habitat Corridors and Connectivity**

Policy CF2: New community Facilities to support Tertiary Education, Culture and home working

Policy CF3: Community Infrastructure Levy Priorities

Policy ST1: Sustainable Transport

Policy ST2 Cycling

*I support cycling routes in residential areas,  
including on small roads*

Policy ST3: Pavement and Pedestrians

THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS  
FORM ON YOUR WAY OUT

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Please tell us about you

<b>Your Full Name</b>	<b>Your Full Address</b>  PLATTS LANE
<b>Your Email</b>	<b>Postcode</b> NW3 7NL

Policy BG1 2: Front Boundary Treatments and Front Gardens

Policy BG1 3: Tree Planting

Policy BG1 4: Light Pollution

Policy BG1 5 Local Green Spaces

POLICY B1: Basements

we are currently having to live with a Basement conversion at 45. Platts. It commenced in Feb - Scheduled to finish Oct. This is the second time this conversion has been done. Previous owner did his conversion a couple of years ago which took nearly a year to complete. Sold house and new owner is now making it larger. I have filmed and recorded noise, and garden council noise dept. have sent me forms and have been helpful. we cannot even open our windows because of noise and dust. Interestingly, local council barristers/lawyers - Searp it all. They don't care PTO.

we have a ~~HO~~ Petition signed by Platts  
have residents about the noise, mess  
and lorries taking up parking spaces

9

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Please tell us about you

<b>Your Full Name</b> Mr R. [unclear]	<b>Your Full Address</b> [unclear] [unclear]
<b>Your Email</b> [unclear]	<b>Postcode</b> [unclear]

**Policy HD1: Housing and Development**

✓

**Policy HD2: Design Codes for Development Sites**

There are some concerns about the way the design codes are written. It would be better if they were more specific and clearer. The current draft is a bit vague and doesn't give enough detail on what is expected.

There are also some concerns about the way the design codes are written. It would be better if they were more specific and clearer. The current draft is a bit vague and doesn't give enough detail on what is expected.

**Policy HD3: Design and Access Statements**

✓

**Policy HD4: Air Pollution**

✓ Agreed.

**Policy BG1 2: Green Habitat Corridors and Connectivity**

Policy BG1 2: Front Boundary Treatments and Front Gardens

Policy BG1 3: Tree Planting

Policy BG1 4: Light Pollution

Policy BG1 5 Local Green Spaces

POLICY B1: Basements

*aligning the two left*

*All very desirable ✓*

UNDER DEVELOPMENT

**Policy LC1: Presumption Against Demolition**

✓ Agree with all proposals.

**Policy LC2: Infill extension Design Code**

**Policy LC3: Local Listing**

**Policy LC4: Enhancement to the environment of the Finchley Road**

✓ All absolutely essential.

**Policy CF1: Protecting Community Facilities**

✓ Agree with all

Policy CF2: New community Facilities to support Tertiary Education, Culture and home working

USA.

Serviced office provision for home workers

Policy CF3: Community Infrastructure Levy Priorities

Policy ST1: Sustainable Transport

✓

Policy ST2 Cycling

✓ Not at the expense of all traffic.  
no bus lane/cyclists only on Finchley Road

Policy ST3: Pavement and Pedestrians

✓ Agreed.

THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS  
FORM ON YOUR WAY OUT

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Please tell us about you

<b>Your Full Name</b>	<b>Full Address</b> Fennerscroft Ave London NW3 7PH
<b>Your Email</b>	<b>Postcode</b> NW3 7PH

Policy HD1: Housing and Development

Too much development.  
The Mt Anvil or Killybegone should  
be the last one.

Policy HD2: Design Codes for Development Sites

Policy HD3: Design and Access Statements

Policy HD4: Air Pollution

Air pollution must be reduced. I've been here since 1981  
and the dust & soot accumulations are so much  
worse. My doctor says it's bad for me. Nose mucus  
getting soot in it from waiting by Fuchley Rd bus stops.

Policy BG1 2: Green Habitat Corridors and Connectivity

Keep green corridors & connectivity. I have one  
& I never use pesticide & I keep it natural for  
fox family & lots of wildlife.

Pol'y HD5 - pollution & noise  
Very important, my daughter did badly on  
her exams due to constant hammering at  
#1 fermcroft from 7AM - 7PM. She ~~still~~ has  
never had headaches until now, work projected  
for another year!

**Policy BG1 2: Front Boundary Treatments and Front Gardens**

Retain rear corridors - I have one & keep it wild for wild life & the fox family that lives there. My neighbor behind is also willing to keep her. Extend lease of tennis club, as it is green & peaceful & other spaces too, like water reservoir.

**Policy BG1 3: Tree Planting**

Please plant more trees. A tree was knocked down in front of 2 Fenwick + Fox asked council to replace it, + 10 years have gone by + nothing after numerous requests.

**Policy BG1 4: Light Pollution**

Reduce neon lights, and avoid huge windows in redeveloped or developed that reflects too much

**Policy BG1 5 Local Green Spaces**

Please keep all green spaces. As more people move in, green space per person is shrinking so must keep all green areas ~~to~~ which supports mental health. Thank you

**POLICY B1: Basements**

UNDER DEVELOPMENT

**Policy LC1: Presumption Against Demolition**

Too ~~are~~ much demolishing currently.  
Too much disruption, rude builders + start causing  
too much congestion

**Policy LC2: Infill extension Design Code**

Keep terrain as is, beauty is the  
variety

**Policy LC3: Local Listing**

**Policy LC4: Enhancement to the environment of the Finchley Road**

Very important. So much of Finchley Road is  
ugly - doesn't put kids in a good mood going to school.  
Beauty is inspiring + needed. I admire how the french  
care about beauty of areas like this, plant trees +  
greenery on finchley road for more oxygen, shade

**Policy CF1: Protecting Community Facilities**

I use the tennis club, St Luke's Church +  
I would have loved ballet classes in neighbourhood  
instead of commuting + polluting to faraway ballet  
classes.

**Policy CF2: New community Facilities to support Tertiary Education, Culture and home working**

Please extend lease on Tennis Club. It's a lovely calm green space ~~for~~ that our family uses to relax. Keep the reservoir a green area. Add ballet classes. I attend St Luke's, so keep it, please.

**Policy CF3: Community Infrastructure Levy Priorities**

**Policy ST1: Sustainable Transport**

**Policy ST2: Cycling**

**Policy ST3: Pavement and Pedestrians**

THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS FORM ON YOUR WAY OUT

# REDINGTONFROGNAL NEIGHBOURHOODFORUM

## GIVE US YOUR FEEDBACK

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These policies are designed to protect the RedFrog area from unsuitable development unfortunately, being a Conservation Area is no longer sufficient. This is an opportunity for residents and businesses within RedFrog to help shape the future development and growth of our neighbourhood.

Please use this form to give us **ALL** your views, the things you like, anything you think that should be changed and anything we should include. We will use your feedback to inform the RedFrog Plan.

Please tell us about you

<p><b>Your Full Name</b></p>	<p><b>Your Full Address</b></p> <p>1 FROGNAL LONDON NW3 6AR</p>
<p><b>Your Email</b></p> <p>you have already i.e. ...</p>	<p><b>Postcode</b></p>

**Policy HD1: Housing and Development**

Agreed — I note that the full policy also includes provision for quality modern design which is good as well, as this is also a tradition in this area

**Policy HD2: Design Codes for Development Sites**

**Policy HD3: Design and Access Statements**

Surveys for Wildlife etc. v. important

**Policy HD4: Air Pollution**

Fully agreed — Traffic/noise during construction is a major nuisance.

**Policy BG1 2: Green Habitat Corridors and Connectivity**

Comprehensive mapping of green areas, watercourses, bat routes etc. Nature is key to the livability of the area and should be preserved + enhanced.

Policy BG1 2: Front Boundary Treatments and Front Gardens

agreed

Policy BG1 3: Tree Planting

u

Policy BG1 4: Light Pollution

u

Policy BG1 5 Local Green Spaces

h

all key to  
the attractiveness  
of the area.

POLICY B1: Basements

UNDER DEVELOPMENT

Policy LC1: Presumption Against Demolition

Fully agreed - ~~the~~ the existing stock is what makes the area attractive.

Policy LC2: Infill extension Design Code

Policy LC3: Local Listing

Policy LC4: Enhancement to the environment of the Finchley Road

Agreed. Finchley Road shopfronts are very inconsistent at present

Policy CF1: Protecting Community Facilities

agreed - these facilities are valued.

Policy CF2: New community Facilities to support Tertiary Education, Culture and home working

Yes, a relatively small scale venue that people could walk to would be good.

Policy CF3: Community Infrastructure Levy Priorities

agreed Finchley Road environment needs improvement & more trees needed.

Policy ST1: Sustainable Transport

Policy ST2 Cycling

all agreed.

Policy ST3: Pavement and Pedestrians

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Please tell us about you

<b>Your Full Name</b> L	<b>Your Full Address</b> Frogwell
<b>Your Email</b> l@redingtonfroggnal.com	<b>Postcode</b> NW3 6AR

**Policy HD1: Housing and Development**

New developments should take into consideration of infrastructure capacity, esp road, parking and pollution effects. ~~Tree~~ Trees and gardens should be protected. Height of new buildgs should not spoil the existing sky line.

**Policy HD2: Design Codes for Development Sites**

Redevelopments, new developments should ~~respect~~ try to protect the <sup>local</sup> ambience, eg. height, volume, and appearance etc.

**Policy HD3: Design and Access Statements**

~~Should not~~ helpful to include more details in planning applications.

**Policy HD4: Air Pollution**

Air pollution is linked with density of housing. EV ~~should be~~ can alleviate the problem, to a certain degree.

**Policy BG1 2: Green Habitat Corridors and Connectivity**

Trees should be protected, gardens be maintained. opportunistic development of garden space should be limited as it'll fundamentally change the character of local life.

Policy BG1 2: Front Boundary Treatments and Front Gardens

Policy BG1 3: Tree Planting

Policy BG1 4: Light Pollution

glass surface can ~~cause~~ be a hazard.

Policy BG1 5 Local Green Spaces

very important part of local community, therefore should be protected, from over-development.

POLICY B1: Basements

UNDER DEVELOPMENT

5

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Please tell us about you

<b>Your Full Name</b> <input type="text"/>	<b>Your Full Address</b> <input type="text"/> - Gardens
<b>Your Email</b> <input type="text"/>	<b>Postcode</b> TSR

Thank you for your excellent work.

Policy HD1: Housing and Development

I presume this is already a lost cause, but Mount Aerial's determination to replace demolished buildings with higher ones ~~is~~ aggravates me, because

Policy HD2: Design Codes for Development Sites

of the loss of light and the destruction of the 'terraced' roof skyline.

Policy HD3: Design and Access Statements

Policy HD4: Air Pollution

Policy BG1 2: Green Habitat Corridors and Connectivity

Policy BG1 2: Front Boundary Treatments and Front Gardens

How can we stop, especially on the Finchley Road, the 'overhanging' of long vehicles, sometimes forcing pedestrians into the road?

Policy BG1 3: Tree Planting

Policy BG1 4: Light Pollution

Policy BG1 5 Local Green Spaces

POLICY B1: Basements

UNDER DEVELOPMENT

Policy LC1: Presumption Against Demolition

Policy LC2: Infill extension Design Code

Policy LC3: Local Listing

Policy LC4: Enhancement to the environment of the Finchley Road

I wholeheartedly commend your efforts to make safer for pedestrians the junctions of Frogal Lane and Arbwright Road with Finchley Road

Policy CF1: Protecting Community Facilities

(maybe this belongs in ST3?)

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Please tell us about you

<b>Your Full Name</b>	<b>Your Full Address</b> AVENUE,
<b>Your Email</b> [Handwritten email address]	<b>Postcode</b> NW3 7QB

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Please tell us about you

<b>Your Full Name</b> 	<b>Your Full Address</b> Kidderpool Avenue NW3
<b>Your Email</b> redingtonfrog@redingtonfrog.com	<b>Postcode</b> NW3 7 SJ

**Policy HD1: Housing and Development**

Unfortunately it seems that nobody has the power to prevent or change developments which can cause chaos & spoil our environment

**Policy HD2: Design Codes for Development Sites**

All the aims are very laudable, but can they be put into practice?

**Policy HD3: Design and Access Statements**

**Policy HD4: Air Pollution**

**Policy BG1 2: Green Habitat Corridors and Connectivity**

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Please tell us about you

	<b>Your Full Address</b> LONDON SWS
<b>Your Email</b> [faint handwritten email address]	<b>Postcode</b> [faint handwritten postcode]

**Policy HD1: Housing and Development**

**Policy HD2: Design Codes for Development Sites**

**Policy HD3: Design and Access Statements**

**Policy HD4: Air Pollution**

*They need to plant a lot to get our oxygen back.  
We have had a lot of building recently - with a lot  
of noise pollution as well.*

**Policy BG1 2: Green Habitat Corridors and Connectivity**

*I would be interested in any get togethers that are  
planned in the future. I was asked if I would be  
interested, & I am.*

**Policy BG1 2: Front Boundary Treatments and Front Gardens**

We have already a front garden planted up, & over the duskier area is a shallow flower bed which my neighbour upstairs looks after. I have the back garden full of flowers, but badly the butterflies stay away. I like the cold planting around trees one sometimes sees near Harefield A station

**Policy BG1 3: Tree Planting**

I would like as many trees as possible. Since the Kings College is being covered over with houses - we need some oxygenating plants to allow us to breathe.

**Policy BG1 4: Light Pollution**

**Policy BG1 5 Local Green Spaces**

the They are getting fewer & fewer - Kings College has gone Westfield has a bit but not as much as before all those flats were built, (badly, according to a scumbag friend of mine), just plasterboard stuck onto the

**POLICY B1: Basements**

snack - We had to build bookshelves, & make them free standing, or they'd bring the walls down

**Policy LC1: Presumption Against Demolition**

There is a lot of demolition going on. Unfortunately, what is substituted is far uglier than what was demolished. I am not looking forward to the work at the end of my garden across the Croftway, knocking down the old student quarters, & rebuilding something horrible. I hope that I may be able to use the Croftway

**Policy LC2: Infill extension Design Code**

**Policy LC3: Local Listing**

**Policy LC4: Enhancement to the environment of the Finchley Road**

I would like to know how it has been enhanced. It was suggested at a meeting that the southern part should have 3 lanes, not a larger bus lane so cyclists could overtake - and only 2 lanes going north & home - No one seemed to think that those who went South, might want to come back!

**Policy CF1: Protecting Community Facilities**

**Policy CF2: New community Facilities to support Tertiary Education, Culture and home working**

What education - Merton College was a great Language School, possibly the best in the UK, but not when it became King's - now it has been sold off, for profit, to make our lives horrible for 2 1/2 years.

**Policy CF3: Community Infrastructure Levy Priorities**

I would like to do a survey to see how much extra petrol we will have to use with the road closures etc. - Over 2 1/2 years it might add up to quite a sum, & then the Company can reimburse us out of their profits -

**Policy ST1: Sustainable Transport**

**Policy ST2 Cycling**

**Policy ST3: Pavement and Pedestrians**

I have a sprained ankle & I have to keep my eyes on the pavements, which are badly uneven - Also the roads are full of potholes - I know we've had a lot of rain, but no one has repaired them (It's <sup>now</sup> building too important?)

**THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS FORM ON YOUR WAY OUT**

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Please tell us about you

<b>Your Full Name</b> /	<b>Your Full Address</b> /
<b>Postcode</b> NW3 7DE	<b>Postcode</b> NW3 7DE

**Policy HD1: Housing and Development**

Agree with the proposal and  
the need to protect green spaces  
and preserving the Red Frog characteristics

**Policy HD2: Design Codes for Development Sites**

**Policy HD3: Design and Access Statements**

α **Policy HD4: Air Pollution**

Strongly agree that CMPs will be required  
to ensure air pollution and noise is  
minimised

**Policy BG1 2: Green Habitat Corridors and Connectivity**

**Policy BG1 2: Front Boundary Treatments and Front Gardens**

Strongly agree with this proposal  
- reinstating front gardens + original features.

**Policy BG1 3: Tree Planting**

Strongly agree with this proposal.

**Policy BG1 4: Light Pollution**

Agree with this proposal

**Policy BG1 5 Local Green Spaces**

Strongly agree with this proposal to protect and improve the green spaces

**POLICY B1: Basements**

UNDER DEVELOPMENT

**Policy LC1: Presumption Against Demolition**

*Strongly agree with the proposal*

**Policy LC2: Infill extension Design Code**

**Policy LC3: Local Listing**

**Policy LC4: Enhancement to the environment of the Finchley Road**

*Agree with the proposal*  
*The area around Finchley Road needs tidying up*  
*Agree with the proposed Finchley Road design*  
*Wide based on existing high quality shopfronts*

**Policy CF1: Protecting Community Facilities**

*Agree with the proposal*

Policy CF2: New community Facilities to support Tertiary Education, Culture and home working

Policy CF3: Community Infrastructure Levy Priorities

X Policy ST1: Sustainable Transport

Charging points and dedicated parking spaces for electric cars would encourage the use of greener transport.  
Agree with this proposal

X Policy ST2 Cycling

Well designated cycle routes + provision of bicycle stands will encourage use of greener mode of transportation.  
Agree with the proposal.

X Policy ST3: Pavement and Pedestrians

Agree with the proposal  
Strongly agree with the need for safer pedestrian crossings particularly at either end of Froggat lane, + across Finchley Road to Froggat lane, which today are not very safe for pedestrians.

THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS FORM ON YOUR WAY OUT

3.21 Comment forms were available, in addition to an online survey, yielding 19 written responses, six online responses and considerable discussion.

## Comments received by online survey

SurveyMonkey Analyze - Redington Frogal - Draft Neighbourhood Plan Policies 25/10/2018, 10:40

Notify others when new results come in for this survey. [Notify others now](#)

### Redington Frogal - Draft Neighbourhood Plan Policies

SUMMARY | DESIGN SURVEY | PREVIEW & SCORE | COLLECT RESPONSES

ANALYZE RESULTS | PRESENT RESULTS **NEW**

**CURRENT VIEW**

+ FILTER + COMPARE + SHOW

No rules applied

Rules allow you to FILTER, COMPARE and SHOW results to see trends and patterns.

1 saved view

---

SAVED VIEWS (1)

EXPORTS (1)

PDF: Survey Monkey draft

+ New Export

---

SHARED DATA

**RESPONDENTS: 6 of 6** SAVE AS

QUESTION SUMMARIES | DATA TRENDS | INDIVIDUAL RESPONSES

Page 1) Comments on Draft Policies

**Q1** SAVE AS

**Policy HD 1: Housing and Development**

Answers: 4 Skipped: 2

RESPONDERS (4) WORD CLOUD TAGS (0)

Showing 4 responses

This section must make a distinction between commercial developments and private housing. It currently does not.

106/2018 10:58 PM View respondent's answers Add tags

I note that in two documents that the area is being described as an Edwardian suburb. I am living in a late Victorian house, and there are many properties from this period as well from after the Edwardian period. Please celebrate this diversity. I also see that you are proposing 50% affordable housing in new developments. I note that at the meeting I attended at St Andrew's church this did not seem to be very popular. I have not been able to access the whole document to see what size of development this is appropriate for, but wonder how this number was arrived at, and consider this high by most planning standards.

101/2310 3:24 PM View respondent's answers Add tags

No high rise development

177/2018 10:36 AM View respondent's answers Add tags

**Q2** SAVE AS

**Policy HD 2: Design Code for Development Site**

Answers: 4 Skipped: 2

RESPONDERS (4) WORD CLOUD TAGS (0)

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Please tell us about you

Your Full Name	Your Full Address
Your Email	Postcode

1

Redfrog Neighbourhood Forum - Feedback on Draft Plan Policies

Policy HD1: Housing and Development

Policy HD2: Design Codes for Development Sites

Policy HD3: Design and Access Statements

Policy HD4: Air Pollution

Policy BG1 2: Green Habitat Corridors and Connectivity

2

Redfrog Neighbourhood Forum - Feedback on Draft Plan Policies

Policy BG1 2: Front Boundary Treatments and Front Gardens

Policy BG1 3: Tree Planting

Policy BG1 4: Light Pollution

Policy BG1 5 Local Green Spaces

POLICY B1: Basements

UNDER DEVELOPMENT

3

Redfrog Neighbourhood Forum - Feedback on Draft Plan Policies

Policy LCA1: Presumption Against Demolition

Policy LCA2: INF extension Design Code

Policy LCA3: Local Listing

Policy LCA4: Enhancement to the environment of the Findley Road

Policy CF1: Protecting Community Facilities

4

Meeting Neighborhood Forum - Feedback on Draft Plan Policies

Policy GF2: New community facilities to support tertiary education, culture and home working

Policy GF3: Community Infrastructure Levy Priorities

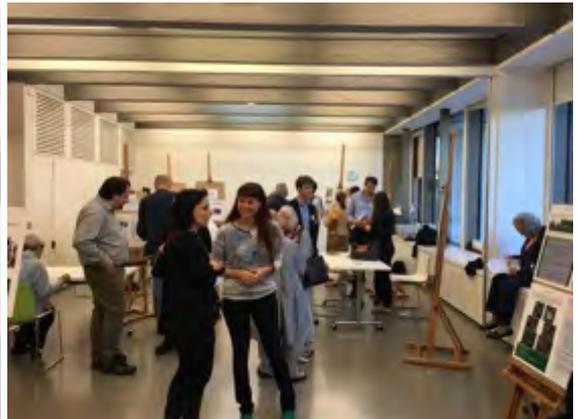
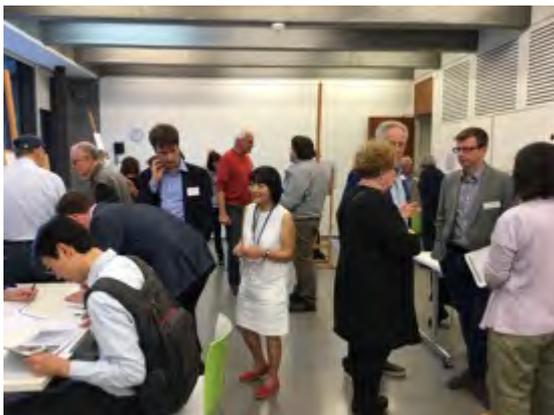
Policy ST1: Sustainable Transport

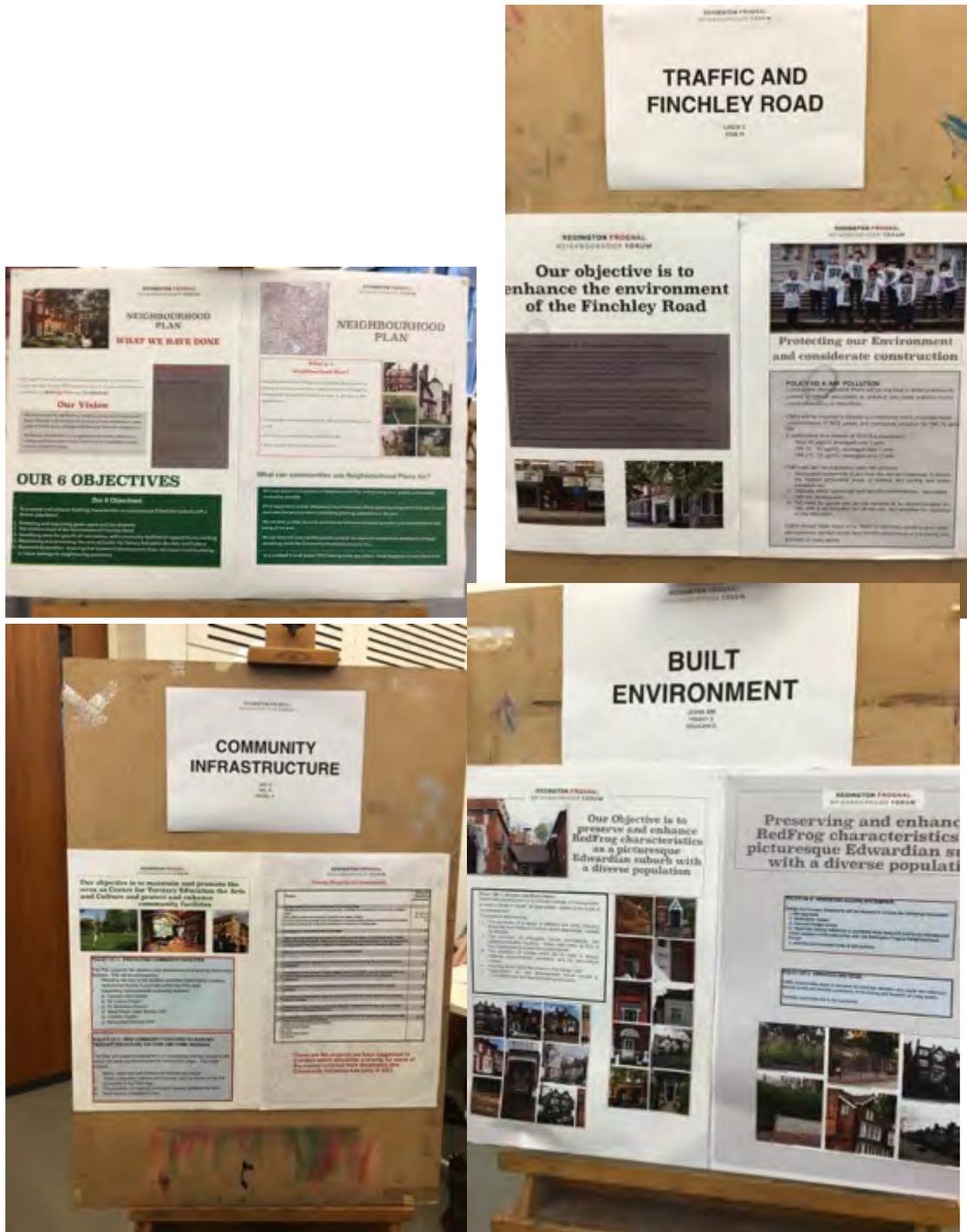
Policy ST2: Cycling

Policy ST3: Pavement and Pedestrians

**THANK YOU FOR YOUR FEEDBACK PLEASE LEAVE THIS FORM ON YOUR WAY OUT**

5





#### 4. Vision and Objectives Statement and Survey, January to December 2015

The findings of the initial survey of February and March 2014 were used to develop the Vision and Objectives Statement. The draft Vision and Objectives Statement was reviewed by [REDACTED] Planning Officer, at a meeting at Camden's offices on 8.11.14. Comments were provided on each of the Objectives.

The Vision and Objectives Statement and Survey were formally launched at a public meeting on 15 March 2015, held at University College School. Flyers were hand-delivered through c. 2,000 letterboxes in time for the 15 March 2015 meeting. Laminated posters advertised the meeting on all lampposts.

Almost 50 residents and local businesses attended the discussion with free wine, quiche, tortilla and olives.



**Redington Froggnal Conservation  
Neighbourhood Forum**

**Invites you to a Forum meeting to discuss  
Visions and Objectives for our  
Neighbourhood Plan area (see map on reverse)**

**When: SUNDAY March 15<sup>th</sup> at 4pm**

**Where: UCS Refectory, Froggnal, Hampstead, NW3 6XH**

We shall be circulating a brochure outlining some visions and objectives to be considered at the meeting.

**Free refreshments available!**

**Please join us and provide your feedback**

[redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)

<http://redfroghampsteadneighbourhood.weebly.com>

The Vision and Objectives Survey was wide-ranging, posing 49 questions and running for 11 months in 2015. It achieved 184 responses and, on the basis of 2,000 households, this equates to a response rate of approximately 10%. The Forum therefore were able to accept that the responses represented the views of the community and could be used them to inform policy drafting.

The Forum's Vision and Objectives received a very high level of support, with 95% of respondents expressing support.



4.1 The survey also gained coverage in the local newspaper, the *Ham & High* newspaper, leading to five new Forum members.

4 H&H Series, Thursday August 6, 2015

## NEWS

### Have a say on Frognal area

Residents in the Frognal and Fitzjohns area of Hampstead are being urged to give their views on how the neighbourhood should look in the future.

The Redington and Frognal Association (RedFrog) are formulating a development plan for the area and have set up an online survey which will close at the end of the month.

RedFrog chairman Rupert McNeil said only ten per cent of residents had responded so far and called for more to give their views on policies.

The survey is at [www.surveymonkey.com/s/RedFrog](http://www.surveymonkey.com/s/RedFrog)

More information is at: [www.redfroghampstead.org](http://www.redfroghampstead.org).

Comments received were addressed and a revised version was finalised, by 20.2.15, with the help of a graphic designer. A Neighbourhood Plan Objectives questionnaire was developed to accompany the survey. After piloting, the statement and survey were circulated by email to all on the membership database and delivered by hand to all 2,000 letterboxes within the Redington Froggnal area.

a case to resist such conversions. Retaining family flats will help maintain the mix of housing and family types.

Community space is required to meet the needs of the large-scale residential developments under construction on Finchley Road and in Kidderpore Avenue; the growth of the elderly population and the population of home workers. The Neighbourhood Plan will seek to meet the need for a civic community facility through the designation of Kidderpore Hall (the White House) in Kidderpore Avenue as a civic community facility.

The opportunity to create Pocket Parks, new woodland and green verges will be taken whenever possible.

**Business Growth**

The area has excellent transport links and some of the fastest broadband in the UK and is a suitable environment for home working.

The Neighbourhood Plan will seek to support home working, through the development of a community facility with meeting space, and business growth by driving Finchley Road footfall through greening measures and a cleaner street.

Many properties in the section of Finchley Road between Arkwright Road and Froggnal are characterised by retail or service use at ground-floor level. Through the measures above, enhancements will be sought to the physical environment, where possible.

**Objective 5**

**Redington Froggnal Conservation Area as Centre for Tertiary Education, the Arts and Culture**

Qub Area Three has a history as an important centre for tertiary education, the arts and culture: King's College London; Queen Mary and Westfield College; Hampstead School of Art; Craxton Studios in Kidderpore Avenue. Further examples are found in Froggnal Lane; Florian Leonard Fine Violins; and in Arkwright Road: Camden Arts Centre.

These are important and established community facilities and are consistent with the cultural interests of residents. They offer the opportunity to maintain the area's tradition of adult education.

Redington Froggnal Neighbourhood Plan will seek to replace any loss of this traditional use, to maintain a community balance and to promote the development of community space in a ward where home working is on the increase and where there are many elderly residents.

**Objective 6**

**Basement Excavation**

The Redington Froggnal Neighbourhood area is situated in Claygate Member and Bagshot Formation in which aquifers are present. Basement excavation causes irreversible change to the water pressures in the ground.

Basement development beyond the building footprint results in loss of green space, endangers trees and can exacerbate surface water flooding.

Basements will be required to be contained within the footprint of the original dwelling, in order to avoid garden take-up. They are to be no more than one storey deep (i.e. the excavation is to extend less than 3.5 metres below ground-floor level), in order to minimise interference with the water table.

Pavements should not be removed from use for more than a few weeks.

**Projects to be Undertaken**

- 1) The designation of Kidderpore Hall (the white building in Kidderpore Avenue) as a civic community facility to help address the unmet and growing need for a community centre (like Burgh House).
- 2) A project to mark the courses of the underground rivers Westbourne, and Tyburn will be examined.
- 3) Develop a register of street trees and trees with TPOs.

**PLEASE COMPLETE OUR QUESTIONNAIRE**  
 online (before 31 August 2015) at:  
<https://www.surveymonkey.com/s/RedFrog>  
 Please also come along to our **Forum meeting** on:  
**SUNDAY 15 March from 4 pm until 6 pm, at**  
**University College School Refectory, Froggnal, London NW3 6XH**

**Redington Froggnal Neighbourhood Development Plan**

The Localism Act 2011 grants local communities the right to guide and shape development in their areas through the formation of a Neighbourhood Forum and the creation of a Neighbourhood Plan. These must accord with Camden's Local Development Framework, national planning policy and the London Plan. If our Plan is successfully adopted, it will be used alongside Camden's own plans to assess planning applications in the Redington Froggnal Conservation Neighbourhood Area.

**Vision & Objectives Redington Froggnal Neighbourhood Area**

Our vision is a set of principles developed by Redfrog residents which help Camden implement current policy and inform and help change future policy.

We seek a future for the Redfrog area which preserves its green character and continues to serve as an area available to a wide range of family types and ages who live here rather than invest here.



**Objective 1 PRESERVE AND ENHANCE REDFROG CHARACTERISTICS**

The Neighbourhood Plan will adopt design and conservation principles to preserve and enhance the characteristics of this green and picturesque Edwardian suburb, with a mixed range of population in terms of socio-economic and age groups. The Neighbourhood Plan will incorporate a prescriptive against demolition. It is a condition that any new buildings are to respect existing profiles, i.e. not greater than 3-4 storeys in height, with gaps between neighbouring buildings, with front and rear gardens and with a footprint which does not exceed the one it is replacing.



A 'green design' policy for front and rear gardens will see gardens maintained, planted, with landscaped surfaces. Side gardens are required, in order to preserve gaps between buildings and views to rear gardens and trees.

Treat boundary treatments of low retaining walls and hedges are to be retained and where not, constructed, as the opportunity arises.

On-street residential parking spaces are to be retained, with no further losses to construction, without garden parking. Their development is to be controlled, in line with Camden policy elsewhere in the borough, and a project to lobby for increased on-street parking will be sought.



**Objective 2 GREENERY AND NEW, GREEN PUBLIC REALM**

The gardens, trees and hedges within Redington Froggnal constitute an important green lung for the health and wellbeing of residents. They also provide habitat for wildlife and form an important green corridor at ground and tree canopy level used by wildlife, linking Hampstead Cemetery and the King's College Site of Importance for Nature Conservation with Hampstead Heath.

The area has suffered some loss of tree cover, private garden space and hedges over recent years. The replacement of green space by hard surface, in an area characterised by hills and hedges, inevitably causes surface water run-off problems, places strain on the drainage system, creates blockages and reduces water availability for gardens.

There will be a presumption against conversion of front gardens to parking space.

The Neighbourhood Plan will require the retention of soft surfacing and trees, taking all opportunities to expand the area of soft surfacing and amount of tree cover.

Private gardens, open space, trees and veteran trees are to be retained, including those which form part of a habitat corridor, back-to-back, below-stair gardens. A project will be launched to consider a succession-planting programme for the area's trees (front and street) and hedges, to ensure that greenery is retained.

These measures will aid biodiversity, help maintain a carbon sink, mitigate air pollution and surface water run-off, provide cooling and aid health and wellbeing.

A high quality and green public realm is important to wellbeing and to promote a sense of civic pride. This will be achieved by retaining existing open space, for the benefit of all residents, by taking opportunities to green neglected areas, and by developing new locally protected green space, including woodland and pocket parks. The existing Borough Grade II Site of Importance for Nature Conservation (the White House) in Kidderpore Avenue will be preserved and enhanced for the benefit of wildlife and biodiversity and designated as locally protected green space.

Where the width allows, arrangements will incorporate grass / wildflower verges and shrubbery, and the provision of benches, particularly on streets with a steep gradient.

Additional locally protected green space is to include West Heath Lawn Tennis Club and a community-supported nature reserve, on the site of the covered water reservoir in Platts Lane, in the event that the reservoir should be de-commissioned. This reservoir is situated on a hillside, surrounded by private gardens and the West Heath Lawn Tennis Club.

Civic pride is to be promoted through Conservation Area signage and well planned, commissioning famous residents and architects.

**Objective 3 ENHANCEMENT OF THE ENVIRONMENT OF FINCHLEY ROAD**

The Neighbourhood Plan will seek to work with TfL to promote safer conditions for pedestrians and cyclists. The planned construction by TfL of Cycle Superhighway 11 between Sans Cottage and Harrow Way provides a key opportunity to promote community cohesion and mitigate some of the destructive impacts from six lanes of traffic.

The Neighbourhood Plan will encourage landscaping, physical improvements and greening measures, in order to provide shade for pedestrians and cyclists and to help filter vehicle pollutants. Specific measures to be sought will include:

1. Construction of a fence between the road and the pavement to help a common entrance duct, in order to enable tree planting
2. Provision of walkability and the provision of wide, tree-lined, pedestrian-friendly pavements with good quality street furniture, level pavements and the removal of unnecessary bollards.

These actions will facilitate the development of Finchley Road as a community area, promote walking and will benefit both Finchley Road residents and traders.

**Objective 4 SUSTAINABLE GROWTH**

A neighbourhood plan is required to support sustainable growth of homes and jobs.

**Residential Growth**

Camden's Local Development Framework policy identifies a 'very high' need for properties with two bedrooms (Development Policy 5.6). Considerable development under way in Kidderpore Avenue and along Finchley Road will help meet this need. The Neighbourhood Forum notes the cumulative loss of dwellings through the



4.2 By the time the Neighbourhood Plan Objectives survey was closed, in December 2015, it had attracted 184 responses, indicating very high support levels of 95% for the Plan's Vision and Objectives.

Q42

Customize Save As

# Vision and Objectives: Overall

Answered: 147 Skipped: 37



	AGREE STRONGLY (1)	AGREE (2)	DON'T KNOW (3)	DISAGREE (4)	TOTAL	WEIGHTED AVERAGE
To what extent, overall, are you supportive of this vision and these objectives for the Redington Frognal Neighbourhood Area?	61.90% 91	33.33% 49	3.40% 5	1.36% 2	147	3.56

## 5. Continuing to Publicise the Draft Policies and Gaining New Members

For the most part, new Forum members have been attracted to join the Neighbourhood Forum, as a direct result of planning applications which would cause harm to their immediate environment.

### Development of King's College Hampstead Campus

The most high-profile planning application was the development of a double-storey underground car park beneath a Site of Interest for Nature Conservation and residential development of the former King's College Hampstead campus. Demonstrations attended by well-known public figures on 10.1.16 and 15.1.16, together with considerable press coverage of the application, resulted in 13 new members.

Support from Sir Tom Conti and Dame Esther gained front-page coverage

#### Esther Rantzen and Tom Conti join protest to save wildlife haven

14:29 19 January 2016 | Emily Baines



Tom Conti and Esther Rantzen oppose plans to build an underground car park on a nature site

Television presenter Esther Rantzen and actor Tom Conti joined a protest against plans to turn a Grade II-listed Hampstead wildlife oasis into an underground car park and housing development.

OURCITY.LONDON <http://www.ourcity.london/>



<http://www.ourcity.london/user/studio/king/guest/>



<http://www.ourcity.london/user/george/turner/name-com/>

George Turner

<http://www.ourcity.london/user/george/turner/name-com/>

Full time  
Investigative  
Journalist

#### King's Gold – How King's College London Is Profiting From The Housing Crisis

Case Studies (<http://www.ourcity.london/Category/Case-Studies/>)

In this latest case for ourcity.london, I look at a battle between King's College London and the local community in Hampstead, who want land to expand a popular local school

The case has revealed some of the tactics used by developers to use recently enacted government legislation to get around affordable housing obligations. It also shows how the lure of offshore cash is driving King's to play the luxury housing game rather than help local residents expand the school, despite King's chartered purpose to promote education.

#### The demand for education

In Camden last year, 60 children were left without a primary school place. The biggest problem was in the Frognal area, where hundreds of new houses are being built.

An online petition gained 478 signatures and 44 objections online.

change.org Start a petition Browse Search Nancy Mass

Your petition Dashboard Edit

Petitioning Chair of DOC Cllr Heather Johnson and 36 others

### SINC to be reduced from 0.65 ha in 2005, to 0.59 ha in 2015, and to ZERO in 2016.

Redfrog Frogmal Association



Share this petition

478 supporters

30 created by Nancy Mass

Share on Facebook

Post to Facebook

Send a Facebook message

Send an email to friends

Tweet to your followers

How to help change.org's

Sign up

Search for all the other petitions by [margaretmiller10@gmail.com](#)

Preview this petition

Q. When is a SINC not a SINC?

A. When it is a 97-space car park surrounded by town houses and 'pavilions'.

The SINC has been a wildlife haven for more than a century. It is situated in close proximity to an area classified as green space deficient. The development will NOT result in the loss of the 903 sq. metres of the green space, as claimed. According to Redfrog's calculations, the loss will be significantly higher, at 0.1 hectare (as much as 20% of the SINC), along with the felling of at least 36 trees.

 Giovanni Spinella @GioSpinella · Feb 4  
residents campaigning against overdevelopment in Frogmal in front of Town Hall @Siobhan\_Baillie @nokidding3 @mennear





Other significant planning applications attracting new members have included:

- the proposed floodlighting of West Heath Lawn Tennis Club (16 new members)
- the successful campaign to save 28 Redington Road, a positive contributor, from demolition, with coverage by the Ham & High newspaper (6 new members)

## Hampstead Highgate Express

**HOT TOPICS:** Camden Council | Barnet Council | Haringey Council | A-level results | GCSE results

### Campaigners' victory over developer as 'outstanding' Hampstead house spared demolition

**PUBLISHED:** 14:36 01 December 2017 | Jon King



*A bid to turn a house, once known as 'Danehurst', in Redington Road, Hampstead, into flats has been rejected after a campaign by concerned residents. Picture: REDFROG*

## **Protecting assets and green spaces**

Rupert Terry, chairman of the Redington Frogna! Neighbourhood Forum, writes:

Your coverage of the attempt to demolish 28 Redington Road and the role played by local residents' associations is appreciated.

However, last week's article misses a key point.

Neighbourhood plans present a once and for all opportunity to deter these incessant onslaughts on our heritage assets and green spaces by developers with deep pockets.

A Neighbourhood Plan for the Redington Frogna! area has been under development since 2014 and is now nearing completion.

Redington Frogna! will be undertaking further community engagement early in 2018, with a public consultation and referendum to follow later in the year.

Please do look out for flyers, which will be posted through letterboxes in the Neighbourhood Plan Area.

- 35 Templewood Avenue, 10 Clorane Gardens, 15 Platts Lane, 30 Redington Road and 41 Frognal (8 new members)

The Forum's bid to designate sites as Local Green Spaces in July 2018, led to interest from four new members.

### **New members gained through citizen science**

Other new members have also been gained through engagement in citizen science to build the RedFrog evidence base. For example, mapping of bat flight paths together with Ecology Network flight paths, led to one new member and mapping of underground water features, together with Arup, saw the introduction of another new member.

A public meeting to discuss air pollution on 26.4.16, at which RedFrog NO2 diffusion tube monitoring results were on display, led to two new members.

### **New members gained through social events**

Other means of attracting new Forum members have been through social events, website and personal referrals and press coverage:

- Lindfield Langland Neighbourhood Association parties were attended on 31.1.15 (11 new members), 10.9.16 (3 new members), 17.1.18 and 15.7.18 (6 new members).
- biscuit icing stalls at summer fairs at Studholme Court on 1.8.15 (2 new members) and at Studholme Court and at St. Luke's School, both on 2.7.16.

The leaflets below, providing progress updates, were prepared for the summer 2016 events.

### What can communities use Neighbourhood Plans for?

- Our main priority is to produce a Neighbourhood Plan with as many local people and business involved as possible.
- If it is approved in a local referendum then it becomes official planning policy which Camden Council must take into account when considering planning applications in the area.

enhance the social, economic and environmental well-being of the area.

- We can direct the way Camden spends some of the money it receives from developers (through something called the Community Infrastructure Levy or CIL).

**In a nutshell it is all about YOU having more say about what happens in your local area**

### What is a Neighbourhood Plan?

A Neighbourhood Plan (NP) gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. It will give us the opportunity to:

- Choose where we want new houses, offices and buildings to be built
- Have a say on what buildings should look like
- Have a say on what infrastructure we need
- Have a powerful set of tools for local people to ensure we get the right type of development





## Neighbourhood Plan Quick Facts



### What we have done so far...

We asked local residents and businesses what is important for them, we had almost 200 responses to our survey and have now developed a RedFrog Vision and 6 Objectives

**Our Vision**

**We seek a future for the RedFrog neighbourhood which preserves its green character and creates a better area as an area available to a wide range of family types and ages who live here rather than invest here.**

**We believe that the RedFrog neighbourhood should celebrate its heritage and offer an area that can be enjoyed by anyone to stroll and enjoy.**

### Our 6 Objectives

1. To preserve and enhance RedFrog characteristics as a picturesque Edwardian suburb with a diverse population
2. Protecting and improving green space and biodiversity
3. The enhancement of the Environment of Finchley Road
4. Identifying areas for growth of new homes, with community facilities to support home working
5. Maintaining and promoting the area as Centre for Tertiary Education, the Arts and Culture
6. Basement Excavation - ensuring that basement development does not impact local hydrology or cause damage to neighbouring properties

If you would like to know more about some of the projects we have done to support our objectives please check our <http://thefrog.org.uk> page



**How you can get involved and help shape the future of RedFrog**

Please read the policies we have drafted for the neighbourhood plan and let us know your thoughts.

You can contact us at [redfrogmail@gmail.com](mailto:redfrogmail@gmail.com) or <https://tffrog.in.yourpress.com>

Thank you to everyone who gave feedback on the policies at our AGM on the 13th June.

**On 18th July 2016 at 7.30 pm in the Theatre at the Arts Centre** we will be sharing the second draft of the policies with everyone - do come and join us and give your comments. Everyone is very, very welcome.

There is still a lot to do before the Plan can be adopted.

Once we have your feedback the draft plan will go to Camden for comments, which of course we will have to respond to.

There will be a formal consultation period of six weeks and a referendum.

- Jazz and Quennell, 24.11.15 (27 new members)
- Jazz and Prosecco, 25.11.16 (11 new members)



**Tulip Siddiq**   
@TulipSiddiq



Follow

Thanks for inviting me to the [@RedfrogNF](#) meeting tonight at Craxton Studios. Lovely evening!



RETWEETS  
8

LIKES  
42





- Camden Arts Centre summer social, where a stall offering children's drawing activities was manned, 9.9.18 (3 members)



- St. Margaret's School summer fair, at which RedFrog organised a Woodland Trust *Speak up for Street Trees* stall, 16.6.18 (0 new members)



- website referrals (4 members)
- personal requests from three Forum members led to interest from 18 new members.

### **Designation of Camden Arts Centre as an Asset of Community Value**

0.2.58 The press release below, issued following acceptance of the Forum's bid to designate Camden Arts Centre as an Asset of Community Value, led to coverage in the Ham & High newspaper in the edition of 8.12.16.

**REDINGTON FROGNAL**  
NEIGHBOURHOOD FORUM

**Redington Frogнал Neighbourhood Forum Secures Asset of Community Value Designation for Camden Arts Centre.**

The Redington Frogнал Neighbourhood Forum (RedFrog) is delighted to announce the success of its application to designate Camden Arts Centre as an Asset of Community Value (ACV).

**About Camden Arts Centre and the Neighbourhood Forum**

Camden Arts Centre and its garden is one of the very few community assets within the Redington Frogнал Neighbourhood Plan Area. Its importance to the community is also recognised in the Redington Frogнал Neighbourhood Plan C1 Policy to preserve and enhance Community Facilities.

This Policy notes the importance of Camden Arts Centre and its role in hosting an internationally acclaimed programme of exhibitions, residencies, artists' projects and public events, including events for schools and colleges and young people. The facility, together with the popular café with free wifi, and garden, is highly valued by Redington Frogнал residents.

Redington Frogнал Neighbourhood Forum Chairman, Rupert Terry (pictured below), said,

"This is testament to the role of RedFrog in preserving and protecting the cultural and environmental assets in the Area."



Notes to the editor

The Redington Frogнал Neighbourhood Forum has been working on the development of a Neighbourhood Plan and the accompanying evidence base since March 2014, and has undertaken various public consultations. Draft Policies will be available for further public consultation in early 2017.

**Significance of the ACV designation**

The ACV designation (also known as Right to Bid) means that, if Camden Arts Centre is placed on the market for sale, the community will be given six months in which to put together a bid to buy the asset to save the asset for community use.

# NEWS

## COMMUNITY

### Camden Arts centre is a real asset

The Redington Frogna! Neighbourhood Forum (RedFrog) is celebrating the success of its application to designate Camden Arts Centre as an Asset of Community Value (ACV).

The ACV designation (also known as Right to Bid) means that, if Camden Arts Centre is placed on the market for sale, the community will be given six months in which to put together a bid to buy the asset to save it for community use.

The arts centre, built in 1956, hosts world-class contemporary exhibitions.

Director Jenni Lomax OBE joined Camden Arts Centre in 1990, and has established an internationally acclaimed programme of exhibitions, residencies, education projects, and public events.

Over the past 25 years the Centre has introduced London audiences to significant artists from abroad; Karin "Mamma" Andersson, Mary Heilmann, Hilma af Klint, Kerry James Marshall, and Kara Walker are among those whose exhibitions at Camden Arts Centre were the first in the UK.

Camden Arts Centre and its garden are key community assets within the Redington Frogna! Neighbourhood Plan Area. Its importance to the community is also recognised in the Redington Frogna! Neighbourhood Plan CF Policy to preserve and enhance Community Facilities.

Redington Frogna! Neighbourhood Forum chairman Rupert Terry said: "This is testament to the role of RedFrog in preserving and protecting the cultural and environmental assets in the area."

The ACV policy notes the importance of Camden Arts Centre and its role in hosting an acclaimed programme of exhibitions.

## Other publicity

### 0.2.59 Camden New Journal coverage of RedFrog campaigns

Thursday, November 15th 2018

Islington Tribune West End Extra Classifieds Jobs letters@camdennewjournal.com

**20 results for "redington"**

Page 1 of 1

**LETTERS**  
**It's the independent shops that lose out when there is a big-store war to gain market share**

• I APPLAUD Dame Janet Suzman for standing up to the Co-op, a billion pound supermarket business which is in a war to gain market...

04 October



**LETTERS**  
**Yet another confusing planning decision**

• CAMDEN has granted planning permission for a "test case" development opposed by the Redington Frognal Association, the Heath...

28 December

**Please don't take a bath, water shortage residents told**

08 March — By Tom Foot



**BOOKS**  
**Peaky blinder**

19 October — By Gerald Isaaman

**Planners approve move to open dog-grooming salon in Hampstead back garden**

A DOG-GROOMING salon is set to open up for business in a back garden after the Town Hall approved plans for a cabin. Neighbours...

04 March

**Howls of protest at plan to set up dog-grooming salon in Hampstead back garden**

A WOMAN wants to set up a grooming salon for dogs in a cabin to be constructed in her back garden. The shed-like structure could...

15 February



**Esther Rantzen and Tom Conti join protest against luxury homes development**

19 January

**'Destructive' plan to replace leafy street's trees with homes sparks fury**

A property firm is seeking permission to build three family-sized houses in rear gardens in Arkwright Road

Published: 11 January,...

11 January

## 0.2.60 RedFrog Twitter account

The screenshot shows the Twitter profile for Redfrog NF (@RedfrogNF). The profile header includes the account name, handle, email (redfrogemail@gmail.com), location (London, England), website (redfrogforum.org), and join date (August 2015). The profile statistics show 190 tweets, 80 following, 58 followers, 35 likes, 0 lists, and 0 moments. The profile picture is a large 'Rf' logo with 'EDFROG' underneath. The bio is empty. The profile grid shows 34 photos and videos, with a 2x3 grid of thumbnails visible. The tweets section shows four tweets from November 2018, each with a link to a survey or resource. The tweets are: 1) Nov 12: A survey for a Neighbourhood Plan for the #RedingtreePrognia area. 2) Nov 10: A survey for spending #Frogna and Fitzjohn's CL revenues. 3) Nov 8: A link to a planning application for #Conservation Area Statement and Camden Local Plan. 4) Nov 8: Advice for objecting to tree #fellings on grounds of #biodiversity and #pollution removal.

Home Moments Notifications Messages Search Twitter

**Rf**  
EDFROG

Tweets 190 Following 80 Followers 58 Likes 35 Lists 0 Moments 0 Edit profile

**Redfrog NF**  
@RedfrogNF  
redfrogemail@gmail.com  
London, England  
redfrogforum.org  
Joined August 2015  
34 Photos and videos

**Tweets Tweets & replies Media**

**Redfrog NF** @RedfrogNF · Nov 12  
Please show your support for a #Neighbourhood Plan for the #RedingtreePrognia area by completing the short survey at:

**Neighbourhood Plan Development Policies**  
Take this survey powered by [surveymonkey.com](https://www.surveymonkey.com). Create your own surveys for free.  
[surveymonkey.com](https://www.surveymonkey.com)

**Redfrog NF** @RedfrogNF · Nov 10  
Many very interesting ideas for spending #Frogna and Fitzjohn's CL revenues at:

**What would you like to see local infrastructure fund...**  
We collect funding from developers to spend on local community projects, and we would love to hear your suggestions on how to spend it.  
[camdenimap.commonplace.is](https://camdenimap.commonplace.is)

**Redfrog NF** @RedfrogNF · Nov 8  
#RedFrog #Conservation Area Statement and Camden Local Plan and tips for objecting to #planning applications.  
See here:  
[redfrogassociation.org/planning/](https://redfrogassociation.org/planning/)

**Redfrog NF** @RedfrogNF · Nov 8  
Helpful advice for objecting to #tree #fellings on grounds of #biodiversity and #pollution removal at:  
[redfrogassociation.org/street-trees/](https://redfrogassociation.org/street-trees/)

## The Demise of Camden's Street Trees

A presentation of new research into the Demise of Camden's Street Trees was held at University College School on 11.12.18

## **PUBLIC CONSULTATIONS AND AGMS**

Informal public consultations and AGMs have proved another fruitful way in which to attract new members. These have included:

### New members gained

15.3.15 : 19

13.6.16 : 49

7.9.17 : 13

28.10.18 : 10

The AGM of 28.10.18 also marked the launch of the new, professionally designed Neighbourhood Forum website, on which the draft Neighbourhood Plan and Evidence Base are hosted

<http://www.redfrogforum.org/draft-neighbourhood-plan-october-2018/>

and the Regulation 14 public consultation.

The 28.10.18 AGM and Regulation 14 public consultation were again extensively promoted, through the delivery of 2,000 eight-page summary leaflets to all Forum area letterboxes, reproduced below.



**What is your view?**  
 We need your feedback to help shape the Neighbourhood Plan Policies.  
**Please complete the on-line survey by 23/01/19:**  
<https://www.surveymonkey.co.uk/r/RedFrogPolicies>  
 Contact: redfrogmail@gmail.com  
[www.redfrogforum.org](http://www.redfrogforum.org)

**REDINGTON FROGNAL**  
 NEIGHBOURHOOD FORUM



**Redington Frognal**  
 Neighbourhood Development Plan  
**DRAFT POLICIES**  
 Summary Leaflet

October 2018

Please complete the on-line survey  
**SEE BACK FOR DETAILS**

The Localism Act 2011 grants local communities the right to guide and shape development in their areas through the formation of a Neighbourhood Forum and the creation of a Neighbourhood Plan. This can help us ensure that our neighbourhood develops in the style, and along the lines, that we favour, rather than simply being at the mercy of developers.

Conservation Area status has failed to afford protection, as recent developments all too clearly illustrate. But, if we, the residents, agree our Neighbourhood Plan, at a referendum in 2019, it will be used alongside Camden's Local Plan to assess planning applications in the Redington Frognal Neighbourhood Plan Area.

It is our last chance to preserve what we value most – the character and environment of our neighbourhood.

Please read the Draft Policy summaries and give your feedback via the online survey at <https://www.surveymonkey.co.uk/r/RedFrogPolicies>

**Development Policies**

We look a future for the Red Frog area which preserves its green character and continues to develop as an area suitable to a wide range of family types and ages, where we live close to the jobs we make.

We believe that the Red Frog neighbourhood should continue to improve and prosper and should continue to be a delightful area to live in and visit, as they do today. This policy will:

The Plan's six policies have been informed by you, the residents of Redington Frognal, in response to the 2016 Vision and Objectives Survey. They are:

- Building and Design
- Biodiversity and Green Infrastructure
- Cultural, Leisure and Tertiary Education, Community and GP Facilities
- Aspirational Development Sites
- Finchley Road – Residential and Retail Environment
- Underground Water Facilities

**Policy BD: Building and Design**

This aims to preserve and enhance Redington Frognal characteristics by applying design and conservation principles to the green and "picturesque Victorian and Edwardian suburb".

The sub policies include a presumption against the demolition of buildings which are positive contributors to the Redington Frognal Conservation Area, identified by Local Listing and / or non-designated Heritage assets.

The use of Design Codes is proposed in relation to new construction and extensions. These will require new buildings to respect existing rooflines, be not greater than 3-4 storeys in height, to incorporate a medium to high level of decoration and detailing appropriate to a historic Conservation Area. Architecture details are to be retained for existing buildings.



A new building designed with the Red Frog Design Code.

New buildings not compliant with the Red Frog Design Code.

A "green" design policy for front and rear gardens aims to maximise the garden area capable of supporting biodiversity and acting as a carbon sink. To help mitigate against climate change and the urban heat island effect, while rear garden boundaries are encouraged to include trees. The incorporation of hedges is also encouraged, to enhance amenity, biodiversity and streetscapes, filter pollutants and minimise rain water run-off. Front boundary walls and hedges are to be retained and, where lost, reinstated, as the opportunity arises.

Other requirements include gaps between neighbouring buildings, to provide views to rear gardens and trees, and a number of key views into and out of the conservation area are designated.



In line with Camden policy, new development is to be careful, to provide good streetscapes.



Green streetscape with trees, hedges, and gardens

Garden front elevations

**Policy BG: Biodiversity and Green Infrastructure**

The gardens, trees and hedges within Redington Frongal constitute an important green link for the health and wellbeing of residents. They also provide habitat for wildlife and form an important ecological network used by wildlife at ground and tree canopy level.

The area has suffered some loss of tree cover, private garden space and hedges over recent years. The replacement of green space by hard surfaces, in an area characterised by hills and ponds, inevitably causes surface water run-off problems, places strain on the drainage system, creates obsolescence and reduces water availability for gardens.

Development of gardens is to minimise losses of trees, hedges and biodiversity habitat; there will be a presumption against the loss of front gardens and / or front garden boundaries. Their reinstatement is encouraged, where possible, along with front gardens which allocate at least 50% of the plot frontage to soft-landscaped front garden.

Development is to protect trees that are important to biodiversity, rear garden tree corridors, local character and / or the Conservation Area. Where appropriate, development should restore tree lines and biodiversity corridors; trees that need to be removed are to be replaced.

A high quality and green public realm is important to wellbeing and to promote a sense of civic pride. This will be achieved by retaining existing open space and providing special designation for a number of Local Green Spaces, such as West

Heath Lawn Tennis Club, the rear garden of Camden Arts Centre and the entire Burwood and planned Axis of Southmore Court



Proposals to excavate gardens for basement development will be required to demonstrate how they will not cause cumulative erosion of garden space, such as nearby trees or concrete or divert an underground stream etc. A minimum depth of 2m of permeable soil is to be provided, to ensure logs trees to become waterless.

These measures will aid biodiversity, help maintain a carbon sink, mitigate air pollution and surface water run-off, provide cooling and aid health and wellbeing.

**Policy CF: Cultural, Leisure and Tertiary Education, Community and GP Facilities**

The greatest population increase in the Frongal & Fitzrovia's ward is projected for the over 60 age groups, placing increasing pressure on the Area's infrastructure.

Community space is required to meet the needs of the large local residents' developments being realised on Finchley Road and in Kildare Avenue, the growth of the elderly population and the population of home workers. The policy therefore aims to both protect existing amenities and encourage the creation of new facilities within the Area.

Protecting existing facilities: the policy seeks to retain Camden Arts Centre, West Heath Lawn Tennis Club, St Luke's and St Andrew's churches, Green Studios, UGS Active and Harrosted School of Art.



Chess in Studios

UGS Active

Camden Arts Centre Café

New cultural, leisure and tertiary education facilities: the Plan will support development which provides spaces for music, ballet and arts classes for children and adults and tertiary education classes, such as those run by the University of the Third Age.

These are important and established community facilities and are consistent with the cultural interests of residents. A civic community facility and an NHS GP practice will also be sought.

New facilities to support home working: the area has high incidence of home working. Development which allocates space for shared business / co-working space will be supported.

Community Infrastructure Priorities: improvements to public realm and greening initiatives, including on Finchley Road, will be high priorities.

**Policy DS: Aspirational Development Sites**

A number of sites have been identified as Aspirational Development Sites to help meet the need for housing growth and community facilities.

These include from the rear of Finchley Road retail buildings, Harrosted Gate office park, and the Allied Irish Bank office block to investment sites in Redington Gardens and sites currently used for garages.

**Policy FR: Finchley Road – Residential and Retail Environment**

Formerly an elegant tree-lined boulevard, the streetscape has become degraded by earlier road widening, loss of greenery, high traffic volumes and the replacement of original shopfronts with acrylic signage and large expanses of plate glass.

The carriageway and footway are managed by TfL. However, regeneration of the retail section of Finchley Road can be achieved with the aid of this policy to retain Victorian and Edwardian shopfronts and to encourage the restoration and reinstatement of lost heritage features.

In the event that a Cycle Superhighway is constructed, the Forum will press TfL to excavate space for a common utility duct to enable tree planting. Reduced traffic volumes and a greener environment will improve air quality, reduce traffic noise and benefit the many residential properties lining Finchley Road.

These actions, together with the introduction of parking and seating, will facilitate the development of Finchley Road as a community boulevard, promote walking and will benefit both Finchley Road residents and traders.



A possible Future Finchley Road

**Policy UWF: Underground Water Features and Basement Excavation**

The geology of the Redington Frongal Neighbourhood area is characterised by aquifers, springs and underground streams.

Basement excavation causes reversible change to the water pressures in the ground and development beyond the building footprint results in loss of green space, enlarges trees and can exacerbate surface water flooding.

Specific screening measures will be expected at the earliest stage in the planning application process. This is to include a review of the RedFrog / Anup map of RedFrog underground water features. Additional information for Basements Impact Assessments will be required, in order to guard against damage to neighbouring properties, and detailed engineering drawings will need to explain how specific construction impacts will be addressed.

The Draft Policies are available to read in full on the RedFrog Forum website. For further details please visit [www.redfrogforum.org](http://www.redfrogforum.org)

Content is updated every week, so please revisit the site to keep up to date.

0.2.61 The meeting was additionally promoted by all-weather flyers affixed to 200 lamp posts with cable ties.

The youngest resident to help deliver the leaflets is pictured below, with one of the 200 lamp post notices to the right.



**Launch of Regulation 14 Consultation and Underground Rivers Presentation at JW3, 28.10.18**



The consultation ran from the launch date of 28 October 2018 until 23 January 2019, to allow extra time for the festive breaks. Following comments received from statutory consultees, substantial editing and restructuring ensued. Changes made include the introduction of a new policy KR Kidderpore Reservoir, following advice received that the bid to protect Kidderpore Reservoir through Local Green Space designation was unlikely to succeed, and the re-writing of the Design Codes as Guidance, removing over prescription to better reflect the character of the Conservation Area.

In the light of these changes, a further Regulation 14 public consultation, with a lighter touch, ran between 24 June and 5 August 2019.

### **Further Regulation 14 Public Consultation, 24.6.19 to 5.8.19**

To inform residents of the changes to the draft Policies, summary leaflets were designed for circulation by email and for distribution as hard copy.

The eight-page Summary Policies leaflet is copied on pages 106 to 114, which following the consultee leaflet on page 105. An electronic version was emailed to the entire Forum membership database of some 450 email addresses and the hard copy version distributed to attendees at the further Regulation 14 drop-in session to consider the Neighbourhood Plan (revised), held on Sunday July 21<sup>st</sup>.

The summarised policies, along with the policies in full and other key documents, were (and continue to be) hosted on the Neighbourhood Forum website at:

<http://www.redfrogforum.org/draft-neighbourhood-plan-june-2019/>

The letter, copied on the following page, was sent to statutory consultees by Signed For post.

**REDINGTON FROGNAL**  
NEIGHBOURHOOD FORUM

24 June 2019

Dear Consultee

**Draft Redington Frogna! Neighbourhood Plan (revised) – Further Pre-Submission Consultation (Regulation 14)**

As a result of comments received, the policies contained in the draft Redington Frogna! Neighbourhood Plan have been restructured, and a new policy added to preserve Kidderpore Reservoir

I am writing to advise you of a further Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended). The full text of the draft **Redington Frogna! Neighbourhood Plan (revised)** is available to view and download at:

<http://www.redfrogforum.org/draft-neighbourhood-plan-june-2019/>

A drop-in session will be held at the Neighbourhood Forum's AGM, which will take place on:

**Sunday 21<sup>st</sup> July from 5 pm**

in a marquee in the gardens behind Hampstead Manor in Kidderpore Avenue NW3 7ST.

A map and the streets covered by the Redington Frogna! Neighbourhood Plan Area can be found at:

<http://www.redfrogforum.org>

**Please email your comments to: [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)**

**Comments are required by Monday 5 August 2019.**

If you do not want your response, including your name, contact details and any other personal information to be publicly available, please say so clearly in writing when you submit your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, this will not be considered as a confidentiality request.

I look forward to hearing from you.

Yours faithfully



Chair

Redington Frogna! Neighbourhood Forum

<http://www.redfrogforum.org>

**REDINGTON FROGNAL**

NEIGHBOURHOOD FORUM

## **Neighbourhood Plan (Revised) Drop-In Session, Sunday 21<sup>st</sup> July**

The Executive Committee were concerned by the prospect of Neighbourhood Plan fatigue among residents. To try to add interest to potential a drop-in to consider the Neighbourhood Plan (revised), the Committee selected a venue likely to attract the interest of residents. The venue selected, the newly developed Hampstead Manor site (planning application 2015/3936/P), had been the focus of a strongly contested planning application where residents had, unsuccessfully, fought hard to prevent the felling of 37 trees and to save one of the buildings, formerly used by the community, for use as a community facility.

As part of the section 106 agreement, public access had been created to the gardens of Hampstead Manor Building works had just been completed and a small, natural area with a pond created. To generate interest, a Neighbourhood Plan drop in session was combined with a pond dipping event and a talk on frogs and toads and wildlife gardening. The event was publicised through emails to the Forum membership database and professionally-designed notices, tied to 100 lamp posts for the two weeks preceding the event and a notice published in the Camden New Journal.

The event was arranged to coincide with the London National Park City celebrations. The drop-in event followed immediately afterwards in the grade II-listed Skeele Library, where the Forum Committee provided free sparkling sangria, non-alcoholic drinks and canapés.

The afternoon was dry and sunny and attracted 90 attendees, although fewer attended the discussion of the Neighbourhood Plan (Revised) policies, that took place in Skeele Library.

REDINGTON FROGNAL  
NEIGHBOURHOOD FORUM

## Opening of Kidderpore Avenue SINC (Site of Interest for Nature Conservation)

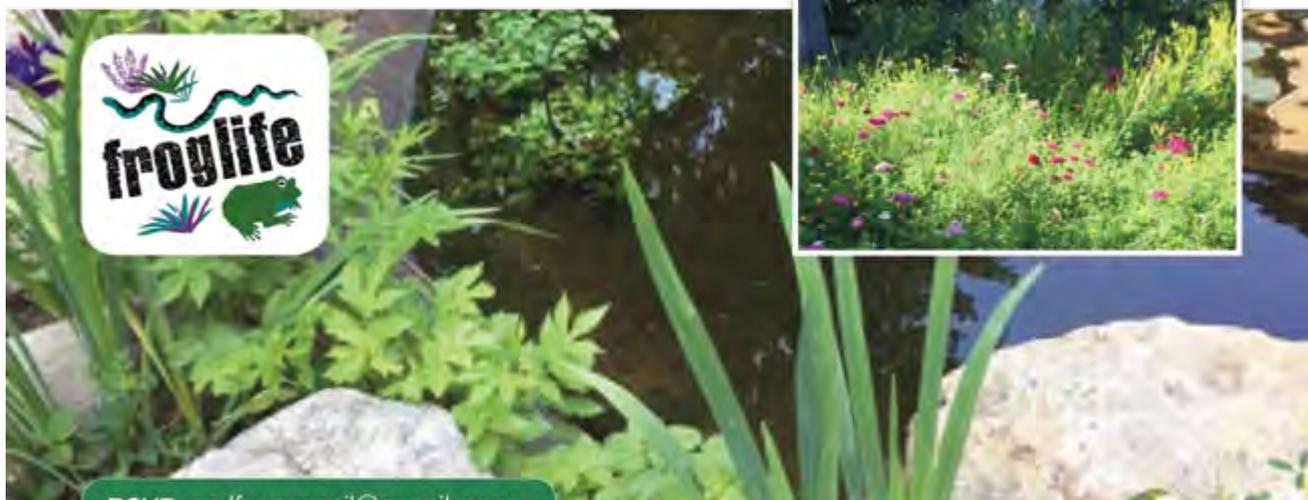
Now open to the public as part of the Hampstead Manor development

**Please join us for the celebration on Sunday 21st July**

3.00 – 4.45 pm at the SINC, Kidderpore Avenue, behind Hampstead Manor  
Accessible behind the new building alongside St Lukes Church.

The event will take place around the pond including workshops on:

- identifying frogs, toads and other amphibians, from FrogLife
- gardening for wildlife



RSVP: [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)

## Draft Redington Frogнал Neighbourhood Plan (revised): Drop-in Session and AGM

The draft Redington Frogнал Neighbourhood Plan has been restructured, and a new policy added to preserve Kidderpore Reservoir. **A further Regulation 14 consultation is being held from 24 June until 5 August.**

See more details at: [www.redfrogforum.org/draft-neighbourhood-plan-june-2019](http://www.redfrogforum.org/draft-neighbourhood-plan-june-2019)

A drop-in session will be held during the Neighbourhood Forum AGM on:

**Sunday 21st July at 4.45 pm** (in the gardens, behind Hampstead Manor development).

Refreshments to be provided.

**Email circulated on 5 and 17 July, 2019**

Dear Forum member,

**Redington Froggnal Neighbourhood Forum AGM, Election of Officers and Executive Committee**

The Neighbourhood Forum AGM, election of officers and Executive Committee will take place on **Sunday 21st July at 4.45 pm**. The venue has been changed and the meeting is now to be held in Skeel Library, part of Hampstead Manor, in Kidderpore Avenue. The entrance is shown below and will be signposted.



Information on the further consultation for the draft Redington Froggnal Neighbourhood Plan will be available, along with a Q&A session and refreshments.

Papers for the meeting are attached, along with the Draft Redington Froggnal Neighbourhood Plan (Revised), summary leaflet and draft minutes of the AGM of 28 October 2018.

RSVP to [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com) (for catering)

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**Other activities for Sunday 21st July - from 3 pm till 4.45 pm**

**From 3 pm until 4.45 pm**, Redington Froggnal Neighbourhood Forum has arranged an event to celebrate of the reinstatement of the Kidderpore Avenue Site of Interest for Nature Conservation. This is now in full bloom and incorporates a natural pond.

Events planned are a workshops on :

- frog and toad identification by FrogLife
- wildlife gardening.

Suitability: all ages, but children must be closely supervised at all times  
When: Sunday 21st July - 3 pm till 4.45 pm  
Where: at the Site of Interest for Nature Conservation opposite Penrose Gardens, bordering St. Luke's Church. The entrance will be marked.

RSVP to: [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)





██████████  
Chairman

Redington Frognaal Neighbourhood Forum  
<http://www.redfrogforum.org/>

The ilovehampstead email is distributed to about 2,000 email addresses and is also posted on a Facebook page

ilovehampstead email of 7 July 2019

[I Love Hampstead - For everyone who loves, lives or works in Hampstead, NW3, London, UK](#)

[View this email in your browser](#)



[www.facebook.com/ILoveHampstead](http://www.facebook.com/ILoveHampstead) - a facebook page BY Hampstead residents, FOR Hampstead residents.

[@ILoveHampNW3](#)

In my last post, I asked for your help to find a lost dog. Unfortunately it has been reported that Gilbert is now deceased - a very sad day for his owner.

This lovely photo capturing Hampstead's beautiful sunset just down the hill from Christ Church is by Jamie Krelsel Lopez.

Contents – please click on the headings below to be taken to the relevant text

## 7. Redington Froggal Neighbourhood Forum

Draft Redington Froggal Neighbourhood Plan (revised); AGM and drop-in session  
Further Pre-Submission Consultation (Regulation 14)

**As a result of comments received, the policies contained in the draft Redington Froggal Neighbourhood Plan have been restructured, and a new policy added to preserve Kidderpore Reservoir (between Platt's Lane and Kidderpore Avenue).**

**A further pre-submission Regulation 14 consultation will now run from:  
24 June until 5 August 2019.**

This is in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended).

A map of the streets covered by the Redington Froggal Neighbourhood Plan is available to view and download at: <http://www.redfrogforum.org>

### **Draft Neighbourhood Plan Policies (Revised)**

The full text of the draft **Redington Froggal Neighbourhood Plan (revised)** is available to view and download at:

<http://www.redfrogforum.org/draft-neighbourhood-plan-june-2019>

**A drop-in session will be held at the Neighbourhood Forum's AGM on:**

**Sunday 21 July at 5 pm .**

The AGM will take place from 5 pm in a marquee in the gardens behind Hampstead Manor in Kidderpore Avenue NW3 7ST.

**Please email your comments to:** [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)  
**Comments are required by Monday 5 August 2019.**

Location of AGM: behind former King's College building, Kidderpore Avenue

### **Redington Froggal Celebration of the re-opening of the Site of Interest for Nature Conservation (SINC) within the grounds of Hampstead Manor in Kidderpore Avenue**

Redington Froggal Neighbourhood Forum has arranged an event to celebrate the re-opening of the Site of Interest for Nature Conservation, which now forms part of the gardens of the Hampstead Manor development in Kidderpore Avenue.

The event will take place around the pond in the gardens and of Hampstead Manor on:

**Sunday 21st July – from 3 pm until 4.45 pm.**

The afternoon will include workshops on:

- identifying frogs, toads and other amphibians, from FrogLife
- gardening for wildlife.

**I Love Hampstead - For everyone who loves, lives or works in Hampstead, NW3, London, UK**

[View this email in your browser](#)

[www.facebook.com/ILoveHampstead](http://www.facebook.com/ILoveHampstead) - a facebook page BY Hampstead residents, FOR Hampstead residents.  
[@ILoveHampNW3](https://www.instagram.com/ILoveHampNW3)

**This gorgeous photo of flowers in a tree pit in Belsize Park is from David Douglas.**

Contents – please click on the headings below to be taken to the relevant text

- 1..... Brexit
- 2..... URGENT CRIME ALERT
- a)..... REGARDING RAM RAIDS IN OUR AREA
- b)..... A spate of robberies in Frognal and Fitzjohns
- 3..... Police and crime - state of the Met
- c)..... Police resources 'drained to dangerously low levels', say former top officer
- d)..... Monthly crime figures for Camden
- e)..... For Gospel Oak residents
- f)..... Cyber crime May 2019
- g)..... Camden Safer Neighbourhood Board
- h)..... Warning regarding cars with contactless keys
- 4..... Nazanin
- 5..... Unusual planning application
- 6..... Abacus school and old Hampstead police station
- 7..... EE/T Mobile outage
- 8..... Highway maintenance backlog hits £1 billion
- 9..... Redfrog neighbourhood forum AGM
- 10..... Opening of Kidderpore Avenue Site of Interest for Nature Conservation
- 11..... Ward boundary changes which removes Hampstead Hill Gardens from Hampstead
- 12..... 5G
- 13..... Royal Free volunteers garden
- 14..... Gayton Road – a brief respite
- 15..... Cycle superhighway 9 in Hounslow
- 16..... Next Door - the community app
- 17..... E-scooters
- 18..... The Hairforce - lice assassins
- 19..... New restaurant on Finchley Road
- 20..... Chinese chairs for sale

## 9. Redfrog neighbourhood forum AGM

REDINGTON FROGNAL  
NEIGHBOURHOOD FORUM

### **Draft Redington Frogнал Neighbourhood Plan (revised) Drop-in Session and AGM**

The draft Redington Frogнал Neighbourhood Plan has been restructured, and a new policy added to preserve Kidderpore Reservoir. A further Regulation 14 consultation is being held from 24 June until 5 August.

See more details at: [www.redfrogforum.org/draft-neighbourhood-plan-june-2019](http://www.redfrogforum.org/draft-neighbourhood-plan-june-2019)

A drop-in session will be held during the Neighbourhood Forum AGM on:

**Sunday 21st July at 4.45 pm, Hampstead Manor, Kidderpore Avenue** (meeting to be held in Skeele Library). Entrance to the right of the red letter box.

**Refreshments to be provided.**

RSVP: [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)

## 10. Opening of Kidderpore Avenue Site of Interest for Nature Conservation

REDINGTON FROGNAL NEIGHBOURHOOD FORUM

### **Opening of Kidderpore Avenue SINC (Site of Interest for Nature Conservation)**

Now open to the public as part of the Hampstead Manor development.

Please join us for the celebration on Sunday 21st July

**3.00 – 4.45 pm at the SINC, Kidderpore Avenue**, behind Hampstead Manor. Entrance to the left of Hampstead Manor and opposite Penrose Gardens.

The event will take place around the pond and include a workshop on frog and toad identification. Pond dipping nets and observation trays supplied.

RSVP: [redfrogemail@gmail.com](mailto:redfrogemail@gmail.com)









Frogs and toads and wildlife gardening at Hampstead Manor on 21 July 219



The drop-in event received publicity in the Ham&High newspaper

# HEATHWATCH



Emily from FrogLife tells visitors at the new Kidderpore Avenue SINC about the area's amphibians.

Picture: REDINGTON FROGNAL NEIGHBOURHOOD FORUM

## Groups across north London celebrate wildlife of local parks

**This weekend, on one side of the Heath, the Redington Frognal Neighbourhood Forum was celebrating the reopening of an important nature conservation site, while in Highgate the Friends of the Parkland Walk (FoPW) were getting into the swing of London's National Park City Week.**

In NW3 on Sunday afternoon, the community celebrated the end of an arduous planning row - which saw a previously prized Site of Importance for Nature Conservation (SINC) lost - as a replacement was opened in Kidderpore Avenue.

The RFNF's chair, Rupert Terry, told *Heathwatch* it had been a lovely day.

He said: "Sunday's celebration of the reopening of the Kidderpore Avenue SINC was a great success."

"The wildlife gardening workshop, presented by FrogLife, was attended by 60 adults and children, who heard about the importance of creating wildlife ponds and garden areas with native wild flowers."

The afternoon also saw the RFNF's annual meeting. It is consulting on a draft neighbourhood plan, which it said will help protect the area's biodiversity, until August 5.

Meanwhile in the Parkland Walk, the Friends group began a bumper set of events planned as

**SAM VOLPE**  
Savvy@redingtonforum.org.uk

part of the city-wide London National Park City Festival.

On Saturday experts explained to visitors about the remarkable birds of the longest linear nature reserve in London.

After that former Haringey conservation officer David Bevan provided a fingertip guide to the flora and fauna of the walk.

Sunday saw "forest bathing" - meditation in the woodland and a guided tree walk.

The week continues with events tomorrow (Fri) too, though. Talks about bugs and bats will take place at 6 and 8.30pm respectively. Find them at the Holmesdale Road end of the reserve.

Cathy Meese, who chairs the FoPW, told this newspaper: "It's a fantastic opportunity to explore."

"We're one of a kind and a really wonderful green space and we've got so much planned."

She added it was "well worth" visiting the newly installed wildlife trail at the walk too, particularly given the good weather.

**To comment on the RFNF draft neighbourhood plan, visit [redingtonforum.org](http://redingtonforum.org). For more about National Park City Festival see [nationalparkcity.london.gov.uk](http://nationalparkcity.london.gov.uk)**



David Bevan is a Haringey flower expert.

Picture: SIMON GILLET



NWF's bugs probably gave FrogLife its name.

Picture: SAM

### Contact us

**We are calling on Heath lovers to send us your pictures and stories about Hampstead Heath.**

Our Heathwatch page is dedicated to the Heath and surrounding green spaces such as Highgate Wood, which have a place in the hearts and minds of people in the Ham&High and Broadway areas.

We are looking for your help in creating a true representation of the unique life on our precious open spaces and beyond.

**If you would like to contribute, please contact Sam Volpe at [sam.volpe@redingtonforum.org.uk](mailto:sam.volpe@redingtonforum.org.uk) or [editorial@hamhigh.co.uk](mailto:editorial@hamhigh.co.uk).**

### What's on

**Friday:** Head to the Parkland Walk for an evening of getting to know the natural world.

From 6, it's time to get to know the creepy crawlies of Haringey, while at 8.30 experts will help visitors learn about the bats which frequent the Walk. (And perhaps you might see one or two!)

Both events are free, meet at the Holmesdale Road entrance to Parkland Walk.

**Tuesday and Wednesday:** In need of a fun family event to distract the kids on a hot summer's day?

You could do worse than head to Kenwood, where 'Summer Quest and Craft' sessions run between 12 and 4 on both Tuesday and Wednesday.

The sessions, which will continue throughout the summer holidays, are £2 each. Turn up during the afternoon to explore the stately home's art and bring it to life.

Upload your pictures at [iwitness24.co.uk](http://iwitness24.co.uk) and you could see them in the newspaper



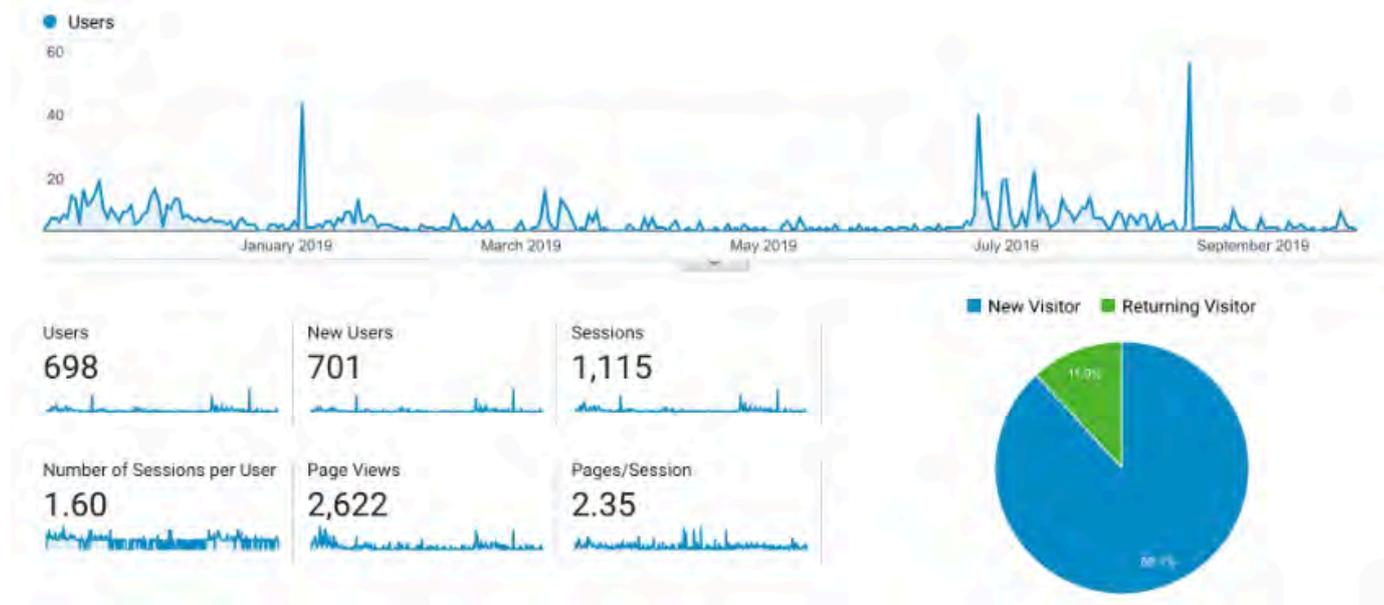
Dedicated websites for the Redington Froggnal Neighbourhood Forum and Redington Froggnal Association also provide publicity for the Redington Froggnal Neighbourhood Plan.

The chart below provides daily viewing statistics for the Neighbourhood Forum website from January to September 2019. This indicates that 535 users viewed the website over this period, with major traffic peaks in 2019 on Saturday 5 January 2019 (40 visitors), on Monday 24th June (37) and Friday 16th August (53 visitors), all dates when new material was added to the website and / or the Plan publicised, eg through lamp post notices.



### Redington Froggnal Association Website Viewing Statistics

Viewing figures for the Redington Froggnal Association website show similar patterns to the Forum website, peaking on Saturday 5th January (35 visitors) and Friday 16th August (54 visitors).



The Redington Froggnal Twitter site has 69 followers:  
<https://twitter.com/RedfrogNF>

# Don't sideline or ignore residents' work



**View from the chamber**

**Cllr Oliver Cooper**

**Last Tuesday, something very rare happened in a grey conference room in Camden's temporary town hall. For the first time since Labour took power in Camden in 2010, the administration had a decision formally overturned.**

I had challenged the council's decision to commit £3m to draw up a property development scheme on Camley Street, east of Camden Town. So far, so what?

Well, this proposal – part of Camden's crumbling, billion-pound CIP development scheme – would have ridden roughshod over a Neighbourhood Plan being painstakingly developed by local residents.

Instead of working with those residents, Labour proposed a scheme completely at odds with that plan – and were rushing it through to deliberately prevent the

plan coming into effect first.

The Camley Street Plan – like those in place in Hampstead, Highgate, and West Hampstead – will help preserve the best of its local community: requiring developments to conform to what residents need, not what Camden's administration demands.

The Neighbourhood Forum behind the plan has spent six years consulting residents and businesses, drafting a document, and building up an evidence base. And here we were Labour refusing to wait even a few months to let it go to a referendum and come into effect – for fear that its plans might be blocked if residents had their way.

Although I represent Hampstead, not Camley Street, treading all over residents' work – rather than working with them – sounded to me like the last thing councillors should be doing and I felt compelled to help stop. I urged councillors to refuse the proposal via a formal procedure called a "cut-in". I asked them to think how they would feel if residents in their areas were sidelined and ignored. Thankfully, the majority agreed with me and refused to release the £3m allocated until the plan had been adopted.

Much of the credit belongs to Cllr Paul Tomlinson, for fighting for his residents even against his



Crowndale Centre is the temporary town hall for Camden.

Picture: CREATIVE COMMONS/PHILAFRENZY

own party, and especially to the Camley Street community for being such eloquent advocates and ambassadors. On his way out of the meeting, the Neighbourhood Forum's chairman even publicly inviting everyone present to the forum's harvest party that Friday. Now that's community spirit!

Although we're used to grappling with difficult developments in Hampstead, I shudder to think what things would be like for my constituents if they were brushed off as easily as Labour tried.

Back in NW3, both the Hampstead Neighbourhood Forum

and the Redington Frognal Neighbourhood Forum need residents' help right now. By law, fora have to apply for re-designation every five years to confirm they're still relevant and active. Both fora are up for re-designation now.

To say they're relevant and active is a gross understatement. As local councillors, we've found them incredibly helpful to strengthen our hand when arguing against proposals that would hurt our community.

So if you think they've been as helpful to you, lend them a hand today. Write to Camden Council –

no matter how briefly – telling them why you think the forum matters. Comments must be received by October 1 and can be made by emailing [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk) or writing to the council.

I've seen first hand just how much a forum like that makes a difference. I dearly hope ours in Hampstead and Redington Frognal get re-approved – and I dearly hope any future attempts in future to trample on our communities get defeated, as it was last week.

**Cllr Oliver Cooper is leader of opposition at Camden Council**

## Policy Revisions Resulting from the Second Regulation 14 Consultation

Significant revisions made as a result of the second Regulation 14 consultation were the:

- deletion of Finchley Road – a Healthy Street, as this concerned non-planning matters
- removal of the policy on Key Views, which would be unlikely to prove effective
- retitling of guidance document, Design and Landscape Guidance (formerly Design Codes, then Guidance Notes for Developers)
- downgrading of the policy for Aspirational Development Sites to Design Guidance for Possible Redevelopment Opportunities
- removal of the table setting out estimates of the potential number of deliverable housing units.

**First Regulation 14 from 28.10.18 until 23.1.19 – Consultee Comments and Forum Responses**

<p style="text-align: center;"><b>Introduction</b></p> <p>INTRODUCTION Camden comment</p> <p>Para 0.1.1 stated policies” – we think this is referring to the policies in the Neighbourhood Plan but it is not entirely clear. The conformity test applies specifically to the strategic policies in the Local Plan. Neighbourhood plans should 'have regard to' or 'take into account' the NPPF or supplementary planning guidance, rather than being in conformity with them.</p> <ul style="list-style-type: none"> <li>• “open to interpretation” – this suggests that the policies in the Local Plan are applied inconsistently or are ambiguous. It is not the role of neighbourhood plans to re-interpret how borough wide policies are applied. Rather, the objective should be to provide locally specific policies taking into account the circumstances of the neighbourhood.</li> <li>• The Plan area is not the same as the Redington Frogna Conservation Area. The potential for confusion or misunderstanding could be avoided if there were a map in the foreword showing the boundary of the designated neighbourhood area as well as the boundary of the conservation area.</li> <li>• Para. 0.1.7 refers to where the evidence base can be inspected - it would be helpful if an electronic link could be provided here</li> </ul> <p>• It is not clear whether this is a particular problem in the plan area and whether the quote from the Heath and Hampstead Society is specifically referring to Redfrog.</p> <p>0.1.7 • As this is the first reference to CIL in the Plan, it would be helpful to clarify this is from 'funding allocations from the local element of the Community Infrastructure Levy (CIL)'</p> <p>0.2.13 live here rather than invest here” – this is something that planning policy cannot generally control.</p> <p>Page 6 • There is no need to reproduce the summary leaflet here – it would be better located in the Plan’s Consultation Statement or in an appendix to the Plan.</p>	<p style="text-align: center;"><b>Introduction</b></p> <p>INTRODUCTION Forum response</p> <p>Re-worded accordingly</p> <p>Changed to "has proved" open to interpretation</p> <p>Changed to "is virtually synonymous with" Link to Google Drive evidence base inserted.</p> <p>This relates specifically to the New End Nurses' Home development, but may equally be applied to new developments in RedFrog (eg Redington Gardens): <a href="https://www.heathandhampstead.org.uk/wp-content/plugins/hhs_pdf_parse/pdf/2018-05.pdf">https://www.heathandhampstead.org.uk/wp-content/plugins/hhs_pdf_parse/pdf/2018-05.pdf</a></p> <p>Amended accordingly</p> <p>This was a statement in the Vision and Objectives Survey, indicating that the Plan intends to improve the Area for residents.</p> <p>Added as Appendix: Vision and Objectives Statement</p>
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BUILDING AND DEVELOPMENT Comment	BUILDING AND DEVELOPMENT Forum response
<p><b>Thames Water</b> Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided</p> <p>Thames Water encourages developers to use our free pre-planning service (<a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>). This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't. The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b></p> <p>Close liaison with Camden needed, but in conformity with NPPF Examples of good modern design would be helpful BD 2 to be clarified BD 2 Should refer to the NPPF criteria rather than Historic England</p> <p>Policy BD 2 be revised to state that in the event of the proposed demolition of such an element that any new development must seek to preserve, or enhance, the character and appearance of the neighbourhood plan area/conservation area and to seek opportunities to strengthen local vitality, sustainability and attractiveness</p> <p>We would suggest that the proposed implementation of a "medium term" marketing period of five years would benefit from revision to allow for criteria demonstrating that an appropriate marketing exercise has been undertaken. Certain types of building may require specialist forms of marketing or it may be expedient to consider the application of planning briefs or accelerated programmes where conditions dictate this is necessary</p> <p>BD5 page 20 The removal of permitted development rights would require implementation of an Article 4 Direction. It may therefore be necessary for certain policies to be recommendations, subject to consultation and designation of an Article 4 Direction. We do however encourage such an approach, which we consider would be beneficial to safeguarding the character and appearance of the conservation area</p> <p>BD 6 The policies for the retention of architectural features as proposed would require an Article 4 Direction. We would recommend discussing with the local planning authority the extent to which Policy BD6 can be implemented without this process being implemented.</p> <p>BD7. It is not clear why certain views have been identified. We would recommend this section is supported by a clear a methodology for defining the viewing corridors which sets out the criteria and identifies the key elements of which are of significance and which it is desirable to preserve. It may be better possible to address a number of the proposed views through broader development policies, such as avoiding in-filling between plots or where the character of the street is defined by the rhythm of mature trees, secluded paths, or where the character is defined by picturesque roof lines. Such a framework could usefully form part of the future recommendations of the Plan.</p>	<p><b>Thames Water</b></p> <p>Incorporated into BD Policy text box as point ii.</p> <p>Incorporated as new first paragraph under BD Application</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b></p> <p>Updated Conservation Area appraisal still awaited None available in Plan Area References to neutral contributions removed Revised accordingly Policy BD 2 i revised to read: In the event of the proposed demolition of any of the elements listed in the bullet points below : ... the replacement development must seek to seek to preserve and enhance the character and appearance of the Redington Froggnal Conservation Area / Neighbourhood Plan Area and seek opportunities to strengthen local vitality, sustainability and attractiveness.</p> <p>Clarification has been obtained and the following wording has been added to the policy text box: "Where a case is made for demolition of a building considered to make a positive contribution to local character and appearance on the grounds of viability, the applicant must provide details of a meaningful marketing exercise, or offer the property on the open market at a reasonable price for a period to be agreed with the local planning authority, subject to market conditions."</p> <p>"An Article 4 Direction should be implemented" added within the Recommendations</p> <p>"An Article 4 Direction will be sought" changed to "An Article 4 Direction should be implemented" within the Recommendations.</p> <p>The aim is to protect the green streetscapes, with hedges of equal importance to trees. The Forum would appreciate help with this and recognise the difficulty. "and to retain the rhythm of mature trees and hedges and picturesque roof lines." added to the policy text box. Infill development is addressed by the Design Codes.</p>
<b>GLA</b>	<b>GLA</b>

While it is considered that the Neighbourhood Plan would contribute somewhat towards sustainability, it could help contribute more positively towards the delivery of Camden's Local Plan and the London Plan.

The Neighbourhood Plan, should include a map/maps, illustrating the extent of the Neighbourhood Plan and how it relates to the wider area. It would also be useful if a map was included showing the distribution of proposed site allocations.

BD 5: While the policy seeks to control infill and extension development there is the possibility that the approach could frustrate the presumption in favour of small housing development as set out in Draft New London Plan Policy H2. The policy should be amended to allow the presumption in favour of small housing development to operate where this is considered to be suitable and appropriate.

BD 5 part iv sets a limit for the maximum land area allowable for the development of extensions to 15% of the unbuilt area or 50% of the entire plot, whichever is the least. While the 50% limit is in line with the Draft New London Plan Policy H2 the 15% limit is not and the policy should be amended to reflect the approach set out in the Draft New London Plan.

#### Camden

Para. 4, p. 8 • It is unclear how developments outside of the Conservation Area will be able to "preserve and enhance the characteristics of a Victorian/Edwardian suburb". This conflicts with para. 16 of the NPPF which states: "Plans should (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Development proposals outside of the Conservation Area would not need to meet this requirement.

• It also would not be reasonable to expect all developments to have a "mixed range of population in terms of socio-economic and age groups" – this is only likely to be achievable on larger schemes where a range of housing types are being proposed. This could be qualified with 'where possible' or 'where feasible.'

Table BD 1 GLA population projections table – anyone over the age of 90 is not included. This seems to conflict with the commentary in para. 13, page 9 that suggests the most significant increase in population is likely to come from the oldest age groups. This demographic should be added to the table.

BD 1 ii and iii • We agree that internal space standards might be a factor in accepting the loss of a residential unit. Other factors, however, may also be relevant to accommodation being considered 'poor', e.g. limited access to sunlight/daylight. We recommend rewording to make it clear that space standards are not the only consideration when considering if a unit should be retained. • Planning applications were available to view electronically prior to 2010: this is not relevant justification for this approach. We suggest instead under 'Application': '2010 has been selected by the Forum as a baseline recognising that over a long period of time, there may have been frequent alterations to houses, involving sub-division and amalgamations. These will have occurred in response to the social and economic conditions of the time, which may not be relevant to consideration of the impacts caused by the loss of small housing units today'. There is no need to include the phrase "whether by different applicants or the same applicant" as the identity of the person/organisation seeking planning permission is not normally a planning matter.

The Plan identifies 11 aspirational development sites and incorporates design codes for new development, infill and extensions. A map with the aspirational development sites is being commissioned

No other vacant space available in the Plan Area.

The aims are in line with paragraph 70 of the NPPF, which advises that, "Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area." It may be that the draft London Plan is not in conformity with this paragraph of the NPPF.

#### Camden

Wording clarified / amended accordingly.

The GLA age bands were misleading, but the table has been updated to 2016-based projections.

Reworded accordingly, but whether or not by the same applicant. Applications by different applicants was cited as an argument for cumulative loss being acceptable in the webcast of the 14.12.17 for 2017/1229/P - 5 Templewood Avenue.

BD 1 vi • First bullet – not all development will occur in the conservation area;  
• “maximise the area of soft landscaping” – this conflicts with para. 16 of the NPPF which states: “Plans should (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. Applicants proposing extensions would not be able to meet these requirements. We suggest qualifying this with ‘where possible’ or ‘where feasible’.  
• “Retain existing trees and vegetation” - the Council applies a systematic approach to the safeguarding of trees on development sites, in line with guidelines set out in BS: 5837 “Trees in relation to design, demolition and construction”. It is unreasonable to resist the development of all trees irrespective of their value.  
Where poor quality trees are lost as a consequence of development, the Council will seek replacement planting, as per Policy A3 of the Camden Local Plan. We suggest qualifying this with ‘where possible’ or ‘subject to an assessment of tree quality (i.e. BS: 5837)’.

BD1 vii "Front garden boundary walls and hedges should be preserved or reinstated for new developments and refurbishments of existing housing stock" – permitted development rights apply, e.g. the demolition of front boundary walls, gates and railings below one metre in height is permitted development in conservation areas, except where these rights have been removed through an Article 4 Direction (as has occurred for a number of properties in Froggnal Way for example). The preservation or reinstatement of existing walls would only be appropriate where they form positive contributors to the conservation area. We suggest adding ‘where appropriate’ and including recognition of ‘Permitted Development’ rights in the ‘Application’ section.

• “average rooms per household as 5.47 and 2.82 bedrooms” – it’s unclear why two figures are mentioned here and what they each refer to.

• This would imply that any loss of soft surface or garden area should be resisted. The Council does not consider this to be a reasonable requirement. Permitted development rights exist allowing some types of development to occur, e.g. construction of a patio. It is also unclear why the refurbishment of properties would lead to the loss of such areas. The approach is contrary to para. 11 of the NPPF which states: “plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change”. We suggest qualifying this as ‘where possible’ and including cross-reference to BD5 – which will set out how extensions should be managed

• Chapter 16 of the NPPF “Conserving and enhancing the historic environment” sets out a clear, detailed approach to conserving them in a manner appropriate to their significance. The Council does not consider the Neighbourhood Plan takes full account of national planning policy by giving an inappropriate level of protection to any neutral contributor or locally listed asset (or assets that the Forum considers might be added to the Council’s local list). The Plan does not provide substantive evidence to justify protection of these assets. This approach fails to take into account relevant considerations that may pertain to individual development schemes, which must be determined on their merits.

• maintain the Conservation Area’s green and verdant character or, if outside the Conservation Area, contribute substantial urban greening measures and increase the green cover in the Plan Area ; • requirement to maximise soft landscaping explained under Application: "Areas of soft surface can be increased by converting hard-surfaced garden areas to soft, natural surface." New paragraph added under Application: "19. The impact of development on trees in the Conservation Area will be a material consideration of any planning application within reasonable proximity to a tree. Development including and subsidiary or enabling works that may result in damage or loss of a Preserved tree will be refused. In addition, unnecessary or excessive pruning works or root disturbance for foundation excavations that would be required to enable a development to be constructed would also be a material consideration in the assessment for planning approval or refusal." (Source: <https://democracy.islington.gov.uk/Data/Executive/200910151930/Agenda/TREE%20POLICY%20V12.pdf>)

New para added in Application: "An Article 4 Direction is recommended to remove Permitted Development rights to demolish front boundary walls, gates and railings below one metre in height in the Conservation Area "

Wording clarified .

A Recommendation has been added "An Article 4 Direction is recommended to remove Permitted Development rights to:

- demolish front boundary walls, gates and railings below one metre in height in the Conservation Area
- create a vehicle hard-standing or to reduce the natural soft surface in a front or back garden to more than 50% of each garden area."

i. Reference to neutral contribution removed, footnote on local listing added and reference to Appendix BD 3 added under Application.

• The Council does not agree that all 'neutral' contributors in conservation area appraisals should be elevated to the same status and degree of protection as a 'positive contributor'.

BD2 Positive contributors are those where there is sufficient evidence and justification for a presumption against demolition to apply.

These buildings will be retained in line with Policy D2f of the Camden Local Plan. The same circumstances do not apply to neutral buildings, they have not been found to have the same value as positive buildings and therefore, in heritage terms there is not a justification for their retention. This is acknowledged by paragraph 201 of the NPPF which states "Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance".

• It would not be reasonable to expect the Council to give the same protection to assets nominated for inclusion on the local list (by the Neighbourhood Forum) as those which have already been fully assessed and identified. The Neighbourhood Plan mainly includes buildings which are either already listed or noted as making a positive contribution to the conservation area. Local Listing does not offer the same degree of protection as 'national listing'. Camden's Local List does not include listed buildings or buildings within conservation areas because positive contributors have already been identified through the conservation appraisal process. Not all of the Redfrog neighbourhood area is within a conservation area so if the Forum considers that a building outside the conservation area has some heritage significance, then this can be identified but it must be clear what supports its heritage significance. These should be assessed against the 'Selection Criteria' for inclusion of an asset on the Council's Local List. We have attached this guidance to the e-mail with our comments.

• "Buildings forming a positive contribution...are to be sensitively adapted and extended" – it's unclear why positive contributors are singled out. It may also be possible to extend or adapt a neutral contributor and development may also assist in provide a means of addressing all/some of the aspects leading to a building being identified as 'negative'. We suggest amending the phrase as follows: "Buildings in forming a positive contribution to the Conservation Area..."

• This paragraph seems to conflict with the local planning authority's statutory duties for assessing the potential impacts of individual schemes on heritage assets. It seems to be more restrictive than Policy BD2 itself which allows harm to be weighed against the public benefits of the proposal, in line with paragraph 196 of the NPPF.

• It implies that all Victorian and Edwardian buildings are of the same quality and should be protected in the same way, when their architectural merit /qualities can be variable. The approach contradicts the NPPF which states in paragraph 190 that: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise". This could be addressed by rewording the opening sentence to state: "The Forum will support development which seeks to appropriately conserve the following types of development:

- i. Victorian or Edwardian buildings of significance;
- ii. Buildings of architectural merit;
- iii. Buildings which on their own, or as a group, form a positive contribution to the Redington Froggnal Conservation Area;
- iv. Locally listed buildings.'

• "its ability to deliver affordable housing" – please note that smaller schemes (adding 1-9 homes net) will not be expected to deliver affordable housing on-site and in these cases, the Council will accept a payment-in-lieu of provision in line with policy in the Camden Local Plan. It needs to be clear that on-site provision of affordable housing would not be expected as part of any balancing test. This could be clarified as follows: "...and its ability to deliver new affordable housing or a payment in lieu of provision'.

i. Reference to neutral contribution removed, footnote on local listing added and reference to Appendix BD 3 added under Application.

ii. Revised to read "Buildings forming a positive or neutral contribution to the Conservation Area may be sensitively adapted and extended, as necessary. This is to ensure that the building and its setting are retained that they remain an integral part of the Area's streetscape and character"

All incorporated, except iv, which has been amended to read "iv. locally listed buildings or a heritage buildings for which the Forum seeks listing as non-designated heritage assets. In the absence of a list from Camden, the Forum have drawn up a list of non-designated heritage assets (Appendix BD 3)."

Deleted

• The marketing period of 5 years seems especially onerous – this seeks to apply the “substantial harm” test in paragraph 195 of the NPPF. The demolition of an individual building in a conservation area will rarely cause substantial harm to a conservation taken as a whole. Cases where this might apply would be a landmark building in a small conservation area. The reference to marketing and viability evidence could not therefore be requested by the Council.

Locally listed buildings will be designated by the Council where they satisfy at least two of the following: Architectural significance, Historical significance, Townscape significance and Social significance. If an existing use ceased, e.g. the community group disbanded or the business was no longer viable, the Council would seek an alternative use that conserves the qualities/significance for which the asset was originally designated. This would still need to be weighed in the balance with other relevant planning considerations. We suggest this paragraph focusses on seeking to conserve the particular significance for which the locally listed building was designated...finding a suitable alternative and viable use.

BD 3 • This Council considered the Templewood Avenue scheme against Policy T2 of the Camden Local Plan. It negotiated a reduction in the number of car parking spaces on-site and both of the flats are to be car-capped, preventing on-street parking permits being sought. This was considered to be an acceptable solution since no new housing units were being created on-site. Specific reference to this application should be removed.

• Criterion (ii) – we do not support the extension of the car-free approach. The Council applies the car-free approach to new dwellings (as well as new commercial floorspace), not all types of domestic development. In drafting the Borough-wide approach, the Council sought to extend the policy as far as it was reasonable to do so. It would not be reasonable for instance, to expect applicants to close off a driveway or grass over a parking area where they are extending or refurbishing their home. This would conflict with paragraph 55 of the NPPF. We are not convinced that neighbourhood plans will be able to extend the circumstances in which the Council’s approach is already applied. We would be happy to **provide further advice to the Forum on this matter**.

• “will enable” The Council will seek opportunities for boundary walls to be replaced or reinstated, however this may not be achievable in every case. The Council’s duty is to ensure that developments “preserve or enhance” the character or appearance of a conservation area. This should be changed to ‘will seek’.

BD5 • The Council supports the inclusion of a policy which guards against the unnecessary loss of garden space. We recognise this is a concern identified in the National Planning Policy Framework (Para. 70). However, the draft approach has not been sufficiently justified based on robust evidence and is unlikely to be effective in decision making and would not meet the Basic Conditions. This policy is much more prescriptive than for example, parts of Draft NP Policy BG1, which sets out what ‘good’ development might look like. • The policy needs to be supported by more evidence demonstrating how this responds to individual plot sizes, level of green/garden cover and extent of development/footprints to development across the plan area. At present, there are two elements forming part (i) which seem to pull in opposite directions. The second part seems to provide substantially more flexibility, particularly if applied to very large gardens.

Reworded as advised by Historic England

Changed to non-designated heritage assets (as sought in Appendix BD 3)

The 5 Templewood Avenue case is important to explain the particular need for this local policy and has been retained.

The Plan Area has a good PTAL rating and the policy is also consistent with the Mayor’s Transport Strategy. The Forum are keen to optimise usage of the scarce land resource and reduce the growth of hard surface. The policy adapts the Local Plan policy for RedFrog conditions and is retained.

The Forum are concerned that this wording would leave too much open to negotiation by Enforcement. We are keen to see an end to the harm and cumulative harm to the Conservation Area streetscapes, which has been documented over many years.

Some bespoke mapping work has since been provided by Ordnance Survey and is being commissioned from GiGL and Proximitytree. The Forum are hopeful that these will strengthen the case.

In most cases it would seem that the 15% 'rule' would need to be applied. We are unclear what proportion of properties will already exceed this particular 'allowance', meaning that householders would no longer be any to undertake development of their gardens. This is likely to be considered as unreasonable and fail the Basic Conditions by preventing opportunities for sustainable development.

- The 15% is to be calculated with reference to the unbuilt area of the plot whereas the 50% allows the whole plot to be taken into account, which will contribute to its restrictiveness. It is unclear why as much as 85% of the original garden size would need to be maintained in all cases to ensure that a garden can be used as an amenity by householders.

The policy is not targeted to specific areas where the cumulative erosion of garden space has been most severe – which would seem to be a more justifiable approach.

- The Council is unable to prevent any loss of green cover/soft surfaces. For example, patios can benefit from permitted development rights. The Plan is misleading in that it seems to suggest that planning decisions made by the Council alone are responsible for the cumulative loss of green space, when there are other factors at play.
- Calculating the percentage of land developed – as opposed to a proportion of a garden (for example an approach used as part of Camden's Basements Policy A5) or reference to the footprint of a building – is likely result in complex and protracted discussions with applicants concerning what can be defined as developed land. Because we cannot protect all greenery or soft surfaces, we suggest focussing the approach on retaining the amenity/usability of the garden and impacts on the character of the conservation area. It might be that garden size is protected according to the sub areas identified in the conservation area appraisal which would have the benefitting of grouping streets or buildings with similar characteristics. Essentially, the approach needs to be more nuanced and based on what the local evidence shows.

We understand the Forum's reasoning for using a baseline of 1 July 1948, however Development Management colleagues have raised concerns this may cause particular difficulty for applicants and slow down the planning process as detailed maps showing properties on this date may not be available. We suggest adopting a more recent baseline.

- The use of the term "minimal gardens" is likely to give rise to confusion for the Council and applicants unless it is defined further.
- Criterion iii. – We generally support this approach however the policy should distinguish between those streets which retain a strong degree of unity/uniformity of development and those where a higher degree of cumulative change has already occurred. This is because "will only be permitted if they reflect" is a high bar which may not be relevant in all cases, even within the Conservation Area. This could be addressed by replacing "will only be" and "will not be permitted" with 'should'.
- The policy's name "Extension Development" does not accurately reflect its wider application, e.g. limiting the construction of outbuildings/ infill.

Para. 6, page 26 • "any harm" – the Council would expect development to avoid unacceptable harm to amenity. It is too onerous to expect all developments to have no harm at all; minor changes to amenity have to be balanced with other planning considerations and the benefits a scheme provides can be considered to override the limited loss of amenity, particularly if the applicant has made all realistic efforts to mitigate potential harm. We suggest deleting the word "any".

The purpose of the policy is not just to preserve the garden as an amenity for future occupiers, but also to provide capacity for biodiverse infrastructure improvements, to increase climate change resilience and minimise the risk of surface water flooding in an area above a large body of underground water.

The Forum consider that erosion has taken place throughout the conservation area and that it is not limited to particular sub areas / streets. A recommendation is included seeking an Article 4 Direction to remove PD rights "for building extensions and outbuildings planned to reduce the unbuilt area of the land plot by more than 15%, compared with the unbuilt area as at 1 July 1948. Alternatively, the footprint of proposed extension or outbuilding, together with the existing building, must not aggregate to more than 50% of the total area of the land plot. The measure to be used is whichever consumes the least rear garden space."

"Minimal gardens" has been revised to "Exceptions to the 15% rule may be applied in the case of properties originally constructed without a garden (as at Hampstead Gate and 25B Fognal)."

iii This criterion has been removed and Infill development has been incorporated into the Design Codes.

Changed to "7. Rear extensions are to avoid harm to the amenity of neighbours, as set out in the Camden's draft Supplementary Planning Guidance: Amenity and Altering and extending your home."

Para. 7 • “views of rear gardens” – these should be protected/retained if they have been identified as being important to the character of the streetscene, e.g. in the Council’s Conservation Area Appraisal. It would not be possible to protect any view of a garden from the street, as these views will not be universally important across the Plan area. We suggest replacing the text “will only be permitted if they” with ‘should’.

Para. 9 • We suggest that all the “Recommendations” sections in the Plan are grouped together and form an appendix where they can all be seen in one place. This will avoid any confusion about their status; ie they do not form planning policy and cannot be used to bind the Council to take particular actions.

Policy BD6 • “notably for Locally Listed Buildings” – we don’t consider the policy needs to make this clarification. As buildings on the local list will have lower heritage significance than listed buildings, it will generally be harder to control minor alterations and demolition, e.g. of boundary walls. We suggest deleting “notably for Locally Listed Buildings”.

Para. 5, page 28 • The paragraph does not acknowledge circumstances where the originals have been lost and replaced with inferior materials. Reinstatement with matching materials would therefore not be desirable. Second sentence of this paragraph should start: “Where appropriate, original, traditional....”

Para. 6, page 28 • The Council will seek opportunities to reinstate lost features, however its powers to require this are limited. Applicants are required to ‘preserve’ or ‘enhance’ the character or appearance of a conservation area. We suggest replacing “will be required” with ‘will be sought’.

Para. 7, page 28 • There is no statutory role for the Neighbourhood Forum and Conservation Area Advisory Committee to be consulted on, or to approve, proposed materials. We suggest deleting this text, although you may wish to make reference which reflects the approach in paragraph 40 of the NPPF: “Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not required to do so by law to engage with the local community...”

Image on page 29 • We recognise that the Forum does not support the approved scheme, however it is not appropriate to include a critique on consented development within the Neighbourhood Plan. We are also concerned that singling out someone’s home intrudes on their rights to privacy. It is not appropriate for the design of residents’ homes to be debated within the Council’s development plan. This text and image should be deleted.

Para. 10, page 29 • We suggest that all the “Recommendations” sections in the Plan are grouped together and form an appendix where they can all be seen in one place. This will avoid any confusion about their status; ie they do not form planning policy and cannot be used to bind the Council to take particular actions.

BD7, page 30 • Local views can provide an opportunity to enjoy views of important landmarks. However, in many images the landmark buildings can be difficult to discern and it is often unclear why a particular vantage point has been chosen for appreciating the asset. While key buildings or greenery will often be contributing elements to the importance of a view, on its own it does not provide adequate justification for the designation. An avenue of trees which helps to structure a view is likely to be more important than shrubs or trees (of uncertain value) which can form a variable backdrop. Other planning policies (including in the neighbourhood plan) and mechanisms such as TPOs already give protection for heritage assets, trees, gardens and areas of biodiversity interest.

• The introduction to the policy refers to the area’s distinct topography (i.e. “the underlying landform”) and how development patterns have been shaped as a consequence, however the images selected do not seem to have taken advantage of aspects from “prominent elevated ridge lines” nor is the enclosure provided by valleys apparent. Paragraph 3 (page 30) refers to “views from high ground to low ground” of being “of particular note” but most of the images look upward and in most cases the images appear to show gentle changes in relief.

Introductory sentence added, “The AECOM Heritage and Character Assessment for Redington Froggnal notes the important contribution of to the verdant and unified character of the Plan Area and sense of place.”

Recommendations transferred to "Appendix: Recommendations"

Changed from "locally listed" to "non-designated heritage assets".

Amended accordingly

Amended accordingly

Text deleted and replaced with "Developers are encouraged to select materials to be used by recourse to pre-application advice and by engaging with the local community."

Transferred to evidence base, section BD 6.

Recommendations transferred to "Appendix: Recommendations"

Text changed to "views from lower ground towards higher ground"

- Some images feature expanses of roadscape or footpath as a dominant feature. This undermines justification for designating the view on the basis of its local distinctiveness/importance.
- The images and supporting text would be better located in an appendix to the Plan, this would also provide more scope for including additional justification as necessary. The images occupy 8 pages of the Plan, reducing the conciseness of the document. If the description and images are transferred to an appendix, the retained policy could be used to name/identify the views, with a map(s) of the neighbourhood area (to an appropriate scale) showing the location and direction of the views.

Without more clarification, it will be difficult for Council officers to understand how the views might be sensitive to/impacted by development. The policy could potentially be strengthened if the views were appraised further by a qualified landscape architect. The Council would also be happy working with the Forum to develop this policy further, including use of an appropriate methodology to ensure views are selected on a consistent basis.

We suggest the Plan gives more focus to protecting those views which are of greatest community or local landscape/heritage value and which are likely to be most sensitive to change. We suggest additional text which simply sets out what the key elements of the view are, where it has been taken from, what is significant / valuable about the view and why this is more important than others. It would also be helpful for the supporting text to clarify whether the views have wider community support and whether they are considered to be important to defining the setting of heritage assets or the character or appearance of the conservation area (this is referred to as a consideration in paragraph 4). Without sufficient information about the view's qualities and importance, it will not be possible to manage change in these areas effectively. We have commented further on the individual images below.

#### Online survey

In the context of this policy and the proposed exception for gardens south of Platt's Lane on Finchley Road, we are concerned about the fate of back gardens along Finchley Road north of 1 Platt's Lane. These are not minimal gardens. These gardens and those of Platt's Lane and Clorane Gardens in fact form quite a large area of semi-wild trees and shrubs with a lot of biodiversity (including owls and bats). The back gardens currently form a green corridor. We are concerned that encouraging developers at Number 1 Platt's Lane (Aspirational Development Site RF 3) and the reference to minimal gardens to the south may put all this at risk.

Loss of gardens is the main problem facing this area. The area of back gardens lost since the 1980s has increased substantially, as extensions of extensions have been built, coupled with increasing areas of patio and decking.

The loss of front and rear gardens to driveways, extensions and garden buildings takes away valuable biodiversity and habitats for wildlife.

I have lived here for 35 years and, over this time, so much of the area's greenery has been lost to off street parking and large rear extensions. As a result, the area has lost, and is continuing to lose, its unique leafy character with a consequential impact on (the loss of) wildlife. This has to stop.

The policy should be more restrictive than it is currently proposed.

There needs to be detailed do's and don'ts in the proposals

Additional sub policies should be introduced to BD 1 and BD 5 to protect residents from overlooking and loss of visual privacy from balconies, roof terraces and building extensions.

Transferred to Appendix BD 6

The Forum would be grateful for advice from Camden, as the AECOM PlanHealth Check budget did not cover key views designation. It may be that the views will have to be deleted?

#### Online survey

This example has been removed from the Policy ytext box BD 5 ii. It now reads: Exceptions to the 15% rule may be applied in the case of properties originally constructed without a garden."

BD 5 aims to reduce the scale of the continuing loss

Policies BD 3, BD 4, BD 5 and BGI should help to redress this

Policies BD 3, BD 4, BD 5 and BGI should help to redress this

The NP policies aim to strike a balance between preservation and enhancement and sustainable development

Camden Planning Guidance "Altering and extending your home" should reduce such problems – if implemented and enforced.

Generally support the policy, however disagree with the blunt proposal (in line with Camden) that all new development is to be car-free. Not all residents spend their entire lives in London (where sole reliance on public transport is perhaps feasible) - eg a number of residents have work or family across the country that necessitates periodic car travel. The approach for cars should be more sophisticated - for example:

- permit limited underground car parking basements for medium density new developments (like Westfield and the new developments on Kidderpore Avenue), that permit new residents to have off-street car parking but don't increase the number of cars searching for car parking spaces on-street

- new medium density developments to be prohibited from having on-street parking permits

- replacement of existing low density housing with new low density housing to have no new restrictions / maintain its status quo (ie if it had offstreet parking, it can maintain it), and no restrictions on the right to apply for on-street parking permits

Generally agree, but not with the 'Victorian and Edwardian' suburb over an above its character.

I strongly disagree with the attempt to impose design homogeneity on new housing stock in the area as it fundamentally goes against the long and illustrious history of RedFrog and Hampstead in avant-garde architecture. Many houses were initially derided and are now considered some of the most important of their time.

The historic and spacious feel to the area is critical to its character and amenity. It should be vigorously preserved.

Conservation of houses can be enhanced by refurbishing multiple occupancy (flats) to single family.

Your list of trees cannot be more than advisory - there are some wonderful and suitable species which are omitted.

Hedgerow planting is all very well, but hedgerows need maintaining properly and laying every few years - without this they get leggy and are poor wildlife support systems.

I don't think you should have a blanket view on the demolition of neutral buildings - many are 1950s - 1970s buildings which are no longer fit for purpose and can be replaced by better structures.

Off street parking provision is not only for owners' own vehicles - technological change will mean that ownership will decrease naturally in the future. It is also important to provide space for workmen - around us all parking spaces are taken by other workmen so ours have to park on the drive. Ownership of cars also does not preclude bicycle usage - you need to look at car use rather than car ownership.

Fundamentally I agree but there should be a design assessment to show the development is sympathetic to both the building and the road.

Particular emphasis on frontage.

Sometimes modern stunning additions can be exciting as long as they enhance the setting.

Policies are required to be in conformity with Camden Local Plan

The design codes aim to ensure an appropriate level of detailing. They allow for innovation and do not strive for homogeneity

This is the aim of all of the NP Policies

Camden Policy H3 c. aims to resist "development that would involve the net loss of two or more homes (from individual or cumulative proposals)"

The list of recommended trees which provide the greatest support to biodiversity has been updated in line with London Plan Policy G7 and "Valuing London's Urban Forest.

Results of the London i-Tree Eco Project":

[https://www.london.gov.uk/sites/default/files/valuing\\_londons\\_urban\\_forest\\_i-tree\\_report\\_final.pdf](https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf)

The reference to demolition of neutral buildings has been removed.

The Forum are awaiting advice from the Conservation Area Appraisal, which is to be updated imminently. An Article 4 Direction is being sought to remove permitted development rights for removing front boundary treatments.

The design code for extensions seeks to ensure that non-designated heritage assets are not harmed through extensions which detract and are unsympathetic to the original building or its setting.

"a presumption against the demolition of buildings which are positive contributors to the Redington Froggnal Conservation Area" is too subjective. Who is to say whether a building is a positive contributor?

Also, as demonstrated by the successful development at 38 Heath Drive, we should not discourage the development of relatively poor buildings/sites.

Better therefore to say "a presumption against the demolition of buildings which are aligned to the historic architecture and therefore representative of the area as a whole, unless the development improves the housing stock and is aligned to the historic architecture"

Any Policy should not be so pedantic that it restricts sensible features. Reproducing pastiche structures will turn out to be an eye-sore in the future

There seems little point to being a conservation area if large-scale developments entirely out of keeping with the character of the area are permitted.

While I broadly agree I don't want to see low quality neo Victorian and Edwardian structures as a default at the expense of high quality innovative design

1. A car free environment is very difficult for parents of very small children, elderly or the disabled. May I suggest that a possible allocation of CIL money is towards electric car charging points. Where cars are not encouraged on driveways it is difficult to charge electric vehicles otherwise.

Buildings are categorised into positive, neutral and negative contributors by the Conservation Area Appraisal. The wording of policy BD2 has now been changed, at the advice of Historic England, to refer to NPPF criteria, with additional wording suggested by Historic England.

It is likely that the previous building at 38 Heath Drive would have been classified as a neutral contributor.

The aim is for a level of detailing and decoration that will enhance the Conservation Area

The use of Design Codes should guard against unsympathetic developments with excessive bulk, scale and massing

The design codes aim to ensure an appropriate level of detailing. They allow for innovation and do not strive for homogeneity

Camden is in receipt of a Mayor of London grant to install electric car charging points, including in RedFrog. The use of CIL money could be considered for a future CIL project

**BD 4 DESIGN CODES: Comment**  
**Online survey**

Neighbours say how much they like the new flats on Heath Drive.

Many of the designs that have replaced the original Victorian and Edwardian buildings, or the extensions to them, have been out of character with the established built environment and I believe that the introduction of design codes will prevent the further erosion of the unique character of RedFrog

The design codes should be both for new and refurbishments.

Strongly disagree.

While I support size and boundary homogeneity, I strongly disagree with the attempt to impose design homogeneity on new housing stock in the area as it fundamentally goes against the long and illustrious history of RedFrog and Hampstead in avant-garde architecture. Many houses were initially derided and are now considered some of the most important of their time.

Where can we comment on BD5 - 7?

Yes I agree gaps and views of gardens are essential

"incorporate a medium to high level of decoration" should change to "incorporate a medium to high level of external decoration"

Again, thinking 40-50 years into the future do we want to have reproduced a pastiche? Do we want to produce the equivalent of Poundbury? Modern structures are not all bad.

Yes, again this is a subjective issue and new design - ie use of glass etc should not be abandoned in deference to blind following of old fashioned ideas

**BD 4 DESIGN CODES: Forum response**  
**Online survey**

No action needed: the detailing, materials, fenestration and storey and roofline are likely to meet RF design codes (but not biodiversity gain)

No action needed

No action needed

The design codes aim to ensure an appropriate level of detailing. They allow for innovation and do not strive for homogeneity

No action needed

Amendment incorporated

The design codes aim to ensure an appropriate level of detailing. They allow for innovation and do not strive for homogeneity

Glass buildings are unlikely to be in conformity with the RF design codes

2. I am concerned about the colour dictate in Appendix briefing BD4 that all windows and porches should be white. I have looked at the SPAB briefing on windows and doors, and the Historic England Briefing on traditional windows, neither specify that sash windows were historically always painted white. ( Historic England has a section on paint colour on P19, which talks about a variety of colours of windows being popular at different times). Paint colour is not a permanent change to a building and for instance, a black porch, or some terracotta paint, or natural wood windows could add accents, allowing owners to express individuality in a sensitive. 3. The 2m between and 4m at the end of a terrace / semi row, is overly prescriptive. If the aim is to achieve a regular rhythm in facades with view between houses this approach will not necessarily achieve this outcome. For some house 2m is too much and others too little. People should be permitted to extend their house in a sympathetic manner respecting the rhythm of their street and not held to 2m and 4m laws.

4. The minimum gap between buildings should still permit single storey side walls and fences to allow for privacy of rear gardens and aid security so that people will not be able to easily gain access from front to back gardens. This is unclear in the document.

**Camden comments**

The design code requirement for white windows will be removed, as it is unlikely to be enforceable. Advice will be sought on minimum gap sizes for the heritage consultancy commissioned to update the RedFrog Conservation Area appraisal.

**Camden comments**

BD 4 • The Council remains concerned that the proposed design codes are too prescriptive and onerous. Its likely effect is to lead to a facsimile style of development as evidenced by the limited number of images/typologies shown in the appendix, inhibiting building design that provides an evolution of traditional building styles and/or a contemporary interpretation of local character.

• The current London Plan states in Policy 7.6 that: “Buildings and structures should comprise details and materials that complement, not necessarily replicate, the local architectural character”, and further, in the supporting text of para. 7.21: “Architecture should contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting in the city. This is often best achieved by ensuring new buildings reference, but not necessarily replicate, the scale, mass and detail of the predominant built form surrounding them, and by using the highest quality materials”.

• The Council is particularly concerned about the following requirements which we consider to be too restrictive: “Heights are to be no more than 3 to 4 storeys and to follow the roofline of adjacent houses” – this is a large plan area and there may be a case for buildings to breach this in certain locations;

• “The proportions must match adjacent houses of the same building type”: there is a lot of variation of building types in the area, even on the same street, where neighbouring buildings might be quite different to each other. It is unclear how this would be applied to proposals for a new building that would not be the same building type as adjacent houses. This requirement also seems to conflict with the statement: “It is not suggested that new buildings should replicate traditional forms and detail”.

✓ CODES

Mediation sought

• “Solid to void ratio: This must be within 10% of the average of that on surrounding buildings”: this is both quite restrictive and it is unclear how it would be applied. It does not seem to acknowledge that surrounding buildings may be a completely different type, period or style. It is also uncertain how wide ‘surrounding’ is intended to be in this context.

• “Locations of proposed windows must be spaced based on the architectural period displayed in that building type.” – It is unclear how this could be applied to more contemporary buildings/modern architecture where spacing of windows can be irregular. If applied to new buildings but based on Victorian or Edwardian styles of architecture, there can be a variety of different styles and approaches within a particular period, suggesting that the approach to spacing will not always be the same. The approach seems overly prescriptive and rigid and likely to conflict with para. 126: “their level of detail...should allow a suitable degree of variety where this could be justified”.

• Accompanying photos – a number of these images are likely to create confusion because the red lines showing proportions or roof lines in the wrong place, or they do not seem to show what they are intended to do. It would also be helpful if the numbered images were annotated and referenced in the text to better understand what they are illustrating.

• The Council are concerned that the design codes as formulated could lead to decisions on individual planning applications following an overly mathematical and streamlined approach, subordinating detailed consideration of high quality and contextual design. They could make it more difficult for the Council to realise genuinely high quality design since applicants will be steered towards satisfying a limited number of objectives set out in the design code/images, rather than considering all of the qualities that may be relevant to delivering high quality, contextually sensitive development. We are concerned that the result could be that developers give less attention to considering “detail and quality”, contrary to what paragraph 20 of the draft Plan intends.

• We consider that the ‘mandatory’ elements should be softened to something that could inform planning decisions. This would enable these elements to be applied sensitively rather than as a rigid set of rules which could risk the wrong outcome. The photos and annotation needs to be amended to ensure the design code can operate effectively. We would be happy to review and provide advice on any revisions.

BD 4: DESIGN

Mediation sought

Mediation sought

- It is not appropriate for a neighbourhood plan to provide a critique or commentary on schemes that are deemed unpopular but have already been granted planning consent. Plans need to be positive, forward-looking documents. This text should be removed.

- It wouldn't be appropriate for all schemes to provide "high levels of detailing and decoration", which this paragraph suggests. This would be unduly prescriptive. Paragraph 126 of the National Planning Policy Framework states, referring to plans and guidance: "their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified".

- The Council could also not require all developments to provide "well-vegetated settings" – the approach seems unduly prescriptive as different types of landscaping may be acceptable, subject to the individual context of the site. Planning policy cannot require all sites to have a particular volume of planting. Paragraph 22 below acknowledges that the density of planting in the area already varies. We suggest qualifying these attributes with "where this would be appropriate".

Policy BD4 • It is not entirely clear what constitutes the "design vision" for the area. Please could the application explain which paragraphs or policy are intended to make up the plan vision.

Paragraph 29, page 23 and page 25 • The text and images relating to the permitted schemes at Kidderpore Avenue should be removed. It is not appropriate for a neighbourhood plan to provide a critique and commentary on consented schemes. The images show a semi-completed development to the north of Kidderpore Avenue and it is unclear to what extent they are representative of the scheme on being fully implemented. We suggest removing the text and images.

Paragraph 1, page 26 • Does the Forum mean 'subordinate', rather than supplementary?

Paragraph 2, page 26 • "is unique in Camden" – there are other conservation areas in Camden with large gardens, including ones with gardens bordering the Heath. We suggest amending as follows: "The Redington Froggnal Conservation Area is unique in Camden in benefittings from properties with large gardens, generally increasing in size and proximity to Hampstead Heath".

Paragraph 4, page 26 • As stated for other policies, it is not appropriate for the neighbourhood plan to provide a critique on already consented schemes. We suggest the text is removed.

This is essential to explain the rationale for the policy and has been retained. The text could perhaps be removed post Examination?

Clarified to "external detailing and decoration". Moderation sought

Sentence added under Application, noting that "The design vision is comprised of the mandatory elements of the Redington Froggnal Design Codes, as set out in Appendix BD 4".

This major development shows how the current approach to architecture has failed to preserve and enhance the conservation area and it is therefore retained as justification for a new approach.

The correction is noted, with thanks.

Retained - we believe that nowhere in Camden is / was as verdant with such large gardens as RedFrog: it was designed as a garden suburb.

This is important to explain the rationale for this policy. The text could perhaps be removed post Examination?

BIODIVERSITY AND GREEN INFRASTRUCTURE Comment	BIODIVERSITY AND GREEN INFRASTRUCTURE Forum response
<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p><b>GLA</b> BGI 1 and BGI 3 GLA officers welcome the Neighbourhood Plan's intention to prioritise green infrastructure and is in line with the Mayor's ambition to increase urban greening in London so that 50% of London is green and the capital's urban forest is increased by 10% by 2050. Where development proposals would result in the loss of a tree/trees replacement should be supported by the use of CAVAT or i-Tree Eco (or similar valuation tool) which considers the system benefits provided by the trees to be replaced. The Neighbourhood Plan should follow the guidance set out in Draft New London Plan Policy G7.</p> <p><b>Camden</b> Map BGI 1, page 40 • It is unclear to what extent the loss of trees has been compensated by replacement tree planting. It is not possible for the planning system or policy to protect every tree regardless of its value. This should be acknowledged in the text or recognition given that the Council cannot protect all trees.</p>	<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p><b>GLA</b> The following text has been added to Policy text box BGI 3 i) added: "Their value should be assessed, using a recognised tree valuation method such as CAVAT or i-Tree Eco with substitute planting to replace the losses also set out."</p> <p><b>Camden</b> This will be checked against ProximiTREE data, which is to be purchased with CIL funds. Replacment of mature trees by saplings will inevitably lead to a loss of canopy cover and reduction in the trees' utility for environmental services.</p>

Para. 21 • The ability to enforce homeowners to retain existing trees or restrict tree removal depends on the value of the tree or group of trees being considered. The planning system and policy is not able to protect every tree. Such an approach would mean protecting trees which provide only limited amenity or biodiversity value and would not take into account a tree's remaining potential life. We would be able to make a TPO where it can be justified so in that sense we agree with AECOM; how the Council can protect trees will vary according to the individual circumstances.

- National Planning Practice Guidance is clear that the amenity value of trees must be considered on a case-by-case basis: "Orders should be used to protect selected trees and woodlands if their removal would have a significant negative impact on the local environment and its enjoyment by the public. Before authorities make or confirm an Order they should be able to show that protection would bring a reasonable degree of public benefit in the present or future" (Paragraph: 007 Reference ID: 36-007- 20140306). In establishing amenity value, the NPPG states that a tree's visibility from a public place and individual, collective and wider impact must be determined. This takes into account matters including the size and form of a tree, its future potential as an amenity and contribution to the character or appearance of a conservation area. It is also important to note that biodiversity value alone cannot be taken into account as a factor in making a TPO: "Where relevant to an assessment of the amenity value of trees or woodlands, authorities may consider taking into account other factors, such as importance to nature conservation or response to climate change. These factors alone would not warrant making an Order" (Paragraph: 008 Reference ID: 36- 008-20140306).
- This context should be made clear in the 'Intent' / introduction to this section.

BGI 1 • Part i) "Gardens in the Plan Area are to be regarded as part of an ecological network". This suggests that all gardens are important for nesting, foraging or movement of species even though their biodiversity value is likely to be variable. The supporting text in paragraph 30 refers to leaving "the unaffected portion of garden connected to unaffected gardens and open space". These statements are likely to give rise to confusion for applicants and decision makers. It introduces uncertainty of how the Council is expected to act if the current biodiversity of the site is minimal/limited. We suggest rewording paragraph 30 as follows: "Development should be carefully situated to sustain existing corridors for wildlife. Where feasible, opportunities should be taken to create new corridors or restore those that have been lost or degraded". The Plan should focus protection on corridors where there is evidence to support their designation. These could be mapped, to an appropriate scale, and included as an appendix to the Plan. Notwithstanding this, there may still be cases where the benefits of development outweigh the loss of individual trees. Paragraph 176 of the NPPF states that local planning authorities should avoid "significant harm to biodiversity"; it does not give the Council the power to resist any harm that may result from development.

The limitation of TPOs is accepted, but the policy aims to deliver an increase in the cumulative biodiversity value of trees in the Plan Area.

The ecological value of the gardens is both cumulative and individual. They are being mapped by GiGL to demonstrate their importance.

• The biodiversity value of landscaping will not normally on its own be sufficient justification for the Council to refuse a planning application. Paragraph 175 part (d) of the National Planning Policy Framework (NPPF) states: "...while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity". The 'Application' section should acknowledge this is likely to be commensurate with the size of scheme, ie. we may be able to get a richer, more diverse range of biodiversity gains on larger sites where there is more variety in ground covers.

• Part (iii) "All applications for new building into, around, over or under a garden (including underground development, extensions, outbuildings and swimming pools) must incorporate provision for tree and hedge planting". The Council will seek replacement planting where the loss of trees or vegetation of value cannot be avoided in line with Policy A3 of the Camden Local Plan and will expect additional trees to be incorporated into schemes "wherever possible". It would not be possible for the Council to require this from all schemes. Not only does this conflict with the Local Plan and NPPF, it is also likely to be contrary to the circumstances in which planning conditions can be used: paragraph 55 of the NPPF states: "Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects". It is also unclear why applicants proposing extensions, outbuildings or swimming pools should be required to provide additional trees or vegetation, particularly if none currently exists within the footprint of the development. We suggest rewording as follows: 'Developments should incorporate suitable planting, including trees where the site allows, to protect the amenity of the area and support biodiversity and local drainage. All applications for new building into, around, over and under a garden (including underground development, extensions, outbuildings and swimming pools) must incorporate provision for tree and hedge planting, unless it can be demonstrated to the Council's satisfaction that this is not feasible or appropriate'.

• Part (iv) The Council does not consider that the approach would be reasonable or enforceable in all cases, particularly if there is no planting within the footprint of the development. Household holders will normally be able to pave over garden space to create patios, without the need for planning permission. This can lead to the loss of trees or vegetation. It seems unreasonable to enforce an 'offsetting' requirement when the planning system considers the loss of soft surface in many instances to be acceptable. This could be addressed by replacing "will be required" by 'is encouraged'. The second sentence could be a second criterion – the Council may be able to secure off-site planting to mitigate harm caused by the loss of trees.

Para. 25-27 • Neighbourhood plans are not intended to be a vehicle to provide critique or commentary on permitted schemes. They are meant to be positive documents that can be used to guide future development proposals. We suggest the removal of these paragraphs.

The Forum believe that substantial enhancements are possible, regardless of plot size

Reworded as: "The location of all extensions or new development should be carefully situated to sustain and enhance existing connectivity for wildlife. Opportunities should be taken to restore and intensify any areas of the ecological network that have become degraded or where connectivity has been compromised."

This sub policy is likely to be supported by London Plan policy G5

The Forum consider that this helps explain the need for such a policy, which aims to provide a positive way forward for more sustainable development in the future.

Para. 31, page 45 • The text implies that a bat and bird screening assessment is required for the majority of developments because “all gardens within the Plan Area” may be on bat foraging and commuting routes and “many hedges and trees” support nesting birds. This goes substantially beyond the evidence and assessment requirements set out in Camden Planning Guidance (CPG) on Biodiversity (March 2018) and not be in line with paragraph 44 of the NPPF which states: “Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question”. Paragraph 4.3 of the CPG states that a preliminary bat survey will be requested in specified circumstances. Similarly ecology surveys are only required for proposals likely to impact on protected species, designated sites and/or priority habitats or species.

- The following change is suggested: “A bat and bird survey screening assessment is therefore required should be undertaken in line with Camden Planning Guidance – Biodiversity and who hold qualifications relevant to the matter being considered, eg. to be conducted by a company which is a member of the Chartered Institute of Ecology and Environmental Management for all planning applications involving the loss of gardens, which provide wildlife foraging and/ or commuting habitat”.

Para. 33 to 36 • We suggest that all the “Recommendations” sections in the Plan are grouped together and form an appendix where they can all be seen in one place. This will avoid any confusion about their status; ie they do not form planning policy and cannot be used to bind the Council to take particular actions.

Policy BGI 2 • Part (i) “Camden Planning Guidance applies to front boundaries and must be enforced for all types of development (including refurbishment and reconfiguration, extension and infill).” Supplementary Planning Guidance is not intended to operate as policy. As noted under the Building and Design policies above, permitted development rights can apply and therefore the advice set out in the ‘Camden Planning Guidance – Design’ cannot be applied by the Council in all circumstances. Where a planning application is needed, the CPG retains some flexibility noting in para. 6.25 that: “Where changes take place no more than 50% of the frontage area should become hard landscape”. Additionally, para. 6.26 states that: “Planning permission will not be granted for hard standings greater than five square metres that do not incorporate sustainable urban drainage systems (SUDS) into the design”. Decision makers are expected to take into account all relevant policies and guidance as appropriate – there is no need to state in a planning policy that reference must always be made to a particular document. We suggest deleting part (i).

Records submitted to GiGL and mapping by the Ecology Network does confirm that bats and bords amnd stiull present throughout the Area.

Changed to: "A bat and bird survey screening assessment should therefore be undertaken in line with Camden Planning Guidance – Biodiversity to be conducted by a company which is a member of the Chartered Institute of Ecology and Environmental Management for all planning applications involving the loss of gardens, which provide wildlife foraging and / or commuting habitat."

Transferred to Appendix: Recommendations

Reworded as: "Camden Planning Guidance applies to front boundaries (except where permitted development rights exist) and must be enforced for all types of development (including refurbishment and reconfiguration, extension and infill)."  
 Recommendation added: "An Article 4 Direction should be implemented to remove permitted dDevelopment rights to remove front boundary walls and hedges."

**BIODIVERSITY AND GREEN IN**

- We consider that part (ii) is in line with the Council's approach.
- Part (iii) – this needs to more clearly state when it would be applied: e.g. 'where the loss of garden space has been demonstrated to be unavoidable, applicants are encouraged to consider opportunities to offset the loss of soft surface through additional planting, particularly where this would help to improve the drainage of front gardens'.

Para. 43 • "detailed design plans" – it needs to be clarified what these are and what they might include. We suggest replacing "detailed" with 'any'.

Para. 44 • The Council agrees that infilling of gaps is generally not acceptable, for example in streets with a strong rhythm and unity of architecture. However, applications need to be considered on their merits and there may be instances where infilling would not compromise the tests set out in paragraph 4.17 of the 'Camden Planning Guidance – Design'. We suggest wording as follows: "Where development of a gap is considered acceptable taking into account Camden Planning Guidance: Design (paragraph 4.17), side extensions should...."

Para. 45 • In this case, the recommendation may more appropriately form part of the policy and/or supporting text.

BGI 3 Para. 54 • As noted above, the Council is only able to protect trees of amenity value, including through the use of Tree Preservation Orders (TPOs). Since not it is not possible for all trees to be protected, it is inevitable that a proportion of trees will be felled. The statement "Replanting efforts have fallen greatly behind" – it is unclear whether this refers to replanting secured through planning conditions/obligations or decisions made by householders. If it means the former, this statement could inadvertently undermine the Council's efforts to enforce replacement planting. We suggest deleting this text. The Council cannot require households to provide replacement planting for trees which are not considered to be of amenity value. Similarly, we cannot require applicants to provide replacement planting when we agree that a tree can be felled (ie. in response to a S211 notice).

- Map BGI6 – in line with our comments above, the Council operates a systematic approach to tree retention – the Council cannot require all trees to be protected as per the National Planning Practice Guidance. It is unclear to what extent the "consented tree fellings" shows the loss of trees considered to be value and whether replacement planting has occurred, or been secured by the Council. The Plan needs to be clear that the Council does not have powers to protect all trees.

**BIODIVERSITY AND GREEN IN**

The Forum are keen that advantage should be taken at every opportunity to re-green streets and wish this policy to apply not only to applications in relation to front gardens which do not currently feature soft surface

"Detailed" has been removed

The Forum are concerned that the Conservatration Area has already been blighted by gap infilling and we are not aware of any remaining gaps where infill development would not be harmful.

The Forum are concerned that this is not always feasible (bins often have to be left on the street) and it has therefore been retained only as a recommendation.

A clearer picture of changes in tree numbers will be available from the purchase of ProximiTREE data

The Forum note that LB Islington has an objective (Tree Policy para. 8.1.1) "To increase the tree cover and species diversity across the Borough, both by planting trees on Council land and by encouraging planting on private land, such that there is an overall increase in the tree population."

BGI3 • Part (i) appears to suggest that trees should be protected where they are important for biodiversity alone. If the Council was considering whether a tree should be protected through a Tree Preservation Order, we have to follow advice set out in the National Planning Practice Guidance which state that trees should be protected based primarily on their amenity value: “Where relevant to an assessment of the amenity value of trees or woodlands, authorities may consider taking into account other factors, such as importance to nature conservation or response to climate change. These factors alone would not warrant making the order” (Paragraph: 008 Reference ID: 36-008-20140306). We suggest replacing “Development will” with ‘Development should’.

- Policy A3 of the Camden Local Plan advises that trees should be retained and planted in accordance with British Standards, taking a ‘right tree for the right site’ approach. The Neighbourhood Plan seems to suggest that trees with biodiversity value should always be protected. However, the Council also needs to take into account other important considerations, such as tree condition and future potential. BS:5837’s ‘Cascade chart’ is a widely recognised means of assessing tree quality. This considers longevity as well as “arboricultural qualities”, “landscape qualities” and “cultural values, including conservation”. We would also emphasise that the assessment process does not automatically mean that every Category A process should be protected – individual schemes have to be assessed on their planning merits taking all planning considerations into account, including any replacement planting that is proposed. The ‘Application’ should make clear that trees within development sites should be protected in accordance with the staged approach and methodology set out in Camden Planning Guidance – Trees. This document is expected to be adopted by the Council in March 2019.

- The approach would be more effective if it indicated where tree lines should be restored or identified, or focussed on, key biodiversity corridors. These need to be clearly shown on a map(s) at an appropriate scale. As set out in comments above, it would not be possible to protect all gardens on the basis they could form part of a biodiversity corridor; nor could the protection of a tree line be guaranteed if the trees concerned were not considered to be of value .

It is hoped London Plan Policy G7 will provide support for other factors to be considered for a tree’s retention (eg CAVAT, i-Tree Eco and biodiversity services)

The critical importance of the Plan Area’s gardens to the ecological network means that biodiversity should be a key consideration in the choice of species and that the right tree for the ecological network will be one that has a high value to biodiversity.

Bluesky will be asked if it is possible to map the current tree population

• Part (a) does not include provision of 'new', alongside protection and restoration. We suggest amending the text as follows: "...should include measures to protect and assist in the restoration of seek opportunities to create, strengthen or restore tree lines and biodiversity corridors..."

• Part (b) the Council can request justification for tree removal at planning application stage but details of tree planting may be secured as a planning condition. We would not be able to require this to be provided alongside the planning application itself. We suggest deleting: "included within the application".

• We don't support the approach that trees should always be reprovided on a '2 for 1' basis. This gives undue emphasis to quantity over the quality of trees and getting a development that follows a 'right tree for the right site' approach. We suggest deleting "by two or more"; this could be replaced with 'an optimal number', with the 'Application' providing more detail about how this might be established.

• Part (c) "notifications of intent to fell are to be accompanied by plans for replacement planting of trees with a high value to insects and lichens, from the list..." : this is beyond the Council's legal powers. When we receive a section 211 notice and don't object, we are not able to apply any conditions to require replacement planting. Similarly, we cannot require applicants to provide any justification or evidence for a tree's removal. By law, they are able to merely identify the location of the tree and ask for permission for it to be felled. This part of the policy should be removed.

• "15 times larger than the diameter of a veteran tree" – this should be 15 times larger than the stem diameter when measured 1.5 metres above ground level.

• "in exceptional circumstances" – this is likely to create confusion for applicants and decision makers as to what circumstances might qualify. The 'Application' should provide more explanation.

Para. 56, page 53 • "Trees should be retained and incorporated as part of any development" – this is too onerous and conflicts with an assessment of tree quality, eg. by reference to BS:5837. The Council cannot expect all trees to be retained, particularly if they have limited life potential. We will seek replacement planting, as the second sentence refers, however this should be qualified with "where possible". Site constraints may make this impossible. The Forum may wish to consider whether it would be possible to seek an 'offset' for the loss.

Para. 57, page 53 • "Tree planting is expected at all development sites" – this is an unrealistic requirement when there will be smaller/constrained sites where planting will not be feasible. We suggest amending as follows: "Trees planting is expected at all development sites should be planted wherever possible, with species..."

a) Amended accordingly

b) "included within the application" has been deleted. The 2 for 1 requirement has been replaced by "one or more trees "

c) Changed to notices of intent "are requested" to be accompanied by....."  
"Exceptional circumstances" removed and the text clarified.

"Where possible" added.

"Wherever possible" added.

- “With species selected on the basis of the trees high biodiversity value” – this is unnecessarily prescriptive and should not be the only consideration for planting schemes. Amenity value, aesthetics (e.g. ornamental trees) and sustainability are some of the other factors which should be considered to get the ‘right tree for the right site’. Suggest replacing with: selected on the basis of the trees’ high with” taking into account trees...’
- “Trees with a large canopy” – this should be trees which will ultimately have a large canopy size.

Para. 58, page 53 • We understand the desirability of having some trees with a long life, however expecting “the majority of trees” to be “capable of living at least 100 years” seems unduly onerous and could be a constraint on developing a more diverse tree canopy in Camden  
– an objective set out in the Council’s Tree Policy and the Camden Local Plan. This would mean trees which may have high biodiversity value but rarely reach 100 years, e.g. the birch could be ruled out. Suggest replacing with: ‘the planting should include an appropriate proportion of trees with a long life expectancy, ie. over 100 years, to ensure a diverse tree canopy’.

Para. 59, page 53 • “For soggy garden sites within 30 metres of an underground stream, as indicated....it is advisable to plant trees with a high water demand” – we strongly recommend the deletion of this text as it could lead to an increased risk of subsidence.

BGI 4 • We understand this policy is intended to act as guidance for applicants. However not all developments could be expected to follow this approach and we consider it is important it is clear this is ‘best practice’. We suggest the following change to the wording: “The Plan encourages all developments to follow ‘best practice’ measures support the Plan’s aims to foster biodiversity and minimise light pollution”

- Part (iii) c) “does not conceal or divert an underground stream or spring line” – If it can be shown that there are no significant impacts to stability or the water environment, we do not see why the diversion of an underground stream or spring line should not be permitted.

- Part (iii) d) “forming part of a rear garden tree corridor” – this does not need to be included – the point is already covered by the first part of this clause: ie. trees with an ecological or amenity. All trees have to be assessed for their quality/significance, including trees that form part of a rear garden tree corridor.

- Part (iii) e) this depends on the degree of impact – ie. which could be mitigated. Biodiversity assets should be protected according to their significance.

The policy is compliant with London Plan Policy G7 and is right for the RedFrog ecological network. Canopy size correction has been incorporated - thanks.

The concern is that it is the mature trees that are being felled, along with their greater CAVAT values and other environmental services. Mature, large canopy trees are key to the character of the Conservation Area. The text has been rewritten: "A majority of the trees selected should be have a long life expectancy, ie. over 100 years, to ensure a diverse tree canopy "

The Forum are not aware of such evidence and our understanding is that the Victorians expressly planted trees such as willow, poplar and oak to reduce the risk of surface water flooding. We do not have access to subsidence records but understand that the risk in RedFrog is "infinitesimally small" (source: Margaret MacQueen).

We consider the BGI 4 guidance may offer greater clarity.

The effects of diverting underground streams and spring lines are unknown. The likelihood is that it would have a negative impact which will not be disclosed by a BIA.

Retained to be on the safe side

The Forum are unaware of any successful enforced mitigation measures

• Part (iii) f) “loss of visual amenity to the character of the host” – it is not clear what visual amenity means here. We suggest amending to: ‘does not harm the appearance or character of the host...’

Incorporated, thank you

BGI 5: LGS **BGI 5 LOCAL GREEN SPACES Comment**

**Online**

LGS 7

Whilst agreeing that the CAC garden provides a valuable green space for the public and wildlife habitat, we would like the Plan under section BGI5 to make specific reference to the wider important use as a space for events, artists' residencies, performances and the exhibiting of art as part of the wider Centre programme. Additionally, it is utilised for our education projects, including our courses for all ages, schools projects (including for local disadvantaged and disabled young people), families and youth programmes. All of this programme benefits both local people, and attracts audiences and visitors from the UK and abroad, as specified in our charitable mission (charity number 1065829) and as an Arts Council England National Portfolio Organisation.

CAC has worked hard to maintain and enhance the value of this green space, including working with professional gardeners long-term, keeping an intentionally wild area, working with a tree specialist for safe upkeep of damaged trees and replanting new trees, all whilst ensuring an appropriate balance of artistic integration, including creative projects that have directly engaged with this habitat.

I will forward photos of the green corridor north of Platt's Lane behind Finchley Road mentioned above to Redfrog. In view of its mature trees and biodiversity value, it would be wonderful if this could be somehow recognised and given some level of protection.

The Green spaces for Redington Frogmal should be amalgamated with hampstead village area to form a cohesive plan.

Dont know anyof these locations in sufficient detail to pass comment

This is difficult to answer as I don't know most of the sites but they all sound worth preserving for one reason or another. The layout makes it complicated as one has continually to go up to the top to see which column is which

I don't personally know these sites

I overlook the gardens of Oakhill Park and the large wooded land used for their garden refuse

It is a wonderful place as a natural habitat

Each year frogs emerge from hibernation and foxes breed

Each year the heron visits

We should enhance protection of these open spaces

I am unfamiliar with some of these sites.

If they are renovated, it is essential that a budget exists for continued maintenance.

Unightly open spaces are just that!

'cattle trough' triangle between Platts Lane and Hermitage Lane could be enhanced to meet all these criteria

Private communal grounds of Oak Tree House at top of Redington Gardens (listed house)

I am in favour of all BGI 5 site preservation.

BGI 5: LGS **BGI 5 LOCAL GREEN SPACES Forum response**

**Online**

LGS 7

This text contained in the table at BGI 5 been amended to read: "Used by vistors as a quiet retreat and a lush green space in which to picnic, read and observe the wildlife. It is additionally used by CAC for events, artists' residencies, performances, art exhibitions and for education, including courses, schools projects (eg for local disadvantaged and disabled young people), families and youth programmes. It is maintained to incorporate a wild area, and has been used for projects that have engaged with this habitat."

Rear gardens and rear garden tree corridors are intrinsic to the ecological network and the character of the NP Area, as noted in BGI 1.

Local Green Spaces and the wider ecological network are being mapped by GiGL

No action needed

No action needed

Oakhill Park lies within the adjoining Hampstead NP Area

No action needed

A CIL project is under way to develop this site as a wild pocket park

This is within the adjoining Hampstead NP Area

No action needed

LGS 4	Frogna Lane Gardens " I live on a top floor flat that overlooks Frogna Gardens. It's a beautiful and peaceful space that is bounded by the A41 Finchley Road, Frogna Lane, and Langland Gardens, that forms a triangle of greenery in an urban setting. Finchley Road is a noisy and polluted 3-lane north and south highway. Frogna Lane and Langland Gardens fight to maintain the onslaught of urbanisation and traffic congestion. Residents living alongside those roads regard the Gardens as the heart and green lungs of the area, that provides social and community space. I support its designation as an essential green space to protect it from any form of development ."	LGS 4	No action needed
LGS 5	As a resident of Rosecroft Avenue; I pass these trees en route to Golders Hill Park and enjoy their shade and shelter in the seasons. The space is well worth conserving	LGS 5	No action needed
<p><b>BGI 5 LOCAL GREEN SPACES Camden comment</b></p> <p>Paragraph 70 • None of Camden meets the ANGSt standard. We do not consider this can be reasonably applied to boroughs in/near Central London. It would be better to refer to deficiencies in provision of open space identified in the Council's Open Space Study 2014. This is currently unavailable on our website but should be available to view shortly.</p>		<p><b>BGI 5 LOCAL GREEN SPACES Forum response</b></p> <p>All research affirms the importance of green space and it is one of the indicators used in BS ISO 37120: 2018 Sustainable Cities</p>	
LGS 1,2, 3	Para. 77, page 59 • The map needs to clearly distinguish the boundary of the site. It currently shows BGI1, BGI2 and BGI3 together.	LGS 1,2, 3	The Forum will commission maps that identify each space separately.
LGS 2	<p>BGI 12 – Kidderpore Reservoir • It is unclear whether this site can meet the criteria for Local Green Space set out in the National Planning Policy Framework. Para. 99 states that "Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period". However, paragraph 77 on page 58 suggests that the site could become "surplus to water supply operations" and potentially become a nature reserve. It is also unclear from the table on page 56 how the reservoir meets the tests set out in NPPF Para. 100.</p> <p>• National Planning Practice Guidance also states that a 'Local Green Space' should be "green areas of particular importance to local communities" (Paragraph 005 Reference ID: 37-005- 201540306). The reservoir is a built structure and does not seem to fit with the description of a green area.</p>	LGS 2	The Forum accept that the space may not currently meet designation requirements, but would like to preserve it as open space for future use as green space / a SINC, should the site become surplus to the requirements of Thames Water (as at Gondar Gardens nearby, which was sold for residential development).
LGS 1,2, 3	Para. 78, page 60 • The map needs to clearly distinguish the boundary of the site. It currently shows BGI1, BGI2 and BGI3 together.	LGS 1,2, 3	We'll commission maps that identify each space separately.
LGS 6	<p>LGS 6: Open Space at Studholme Court, para. 84, page 63</p> <p>• The open space does not seem to conclusively demonstrate that it meets criteria (b) of para. 100 of the NPPF. The amenity benefits of the open space are principally enjoyed by the residents of Studholme Court, rather than the wider community.</p> <p>Para. 89, page 65</p> <p>We suggest that all the "Recommendations" sections in the Plan are grouped together and form an appendix where they can all be seen in one place. This will avoid any confusion about their status; ie they do not form planning policy and cannot be used to bind the Council to take particular actions.</p>	LGS 6	Text added that the site comprises 53 family flats.
			Transferred to Appendix: Recommendations

LGS 9

LGS 9: Borough Grade II SINC • The title refers to the status of the land as SINC but the proposed LGS is larger, including elements that were not included in the 2003 notification. Further evidence is required to understand whether these additional areas would meet the standards expected of a SINC, given that is a substantive reason given in the Plan for the area's designation. The biodiversity value of these additional areas needs to be confirmed by appropriate professional advice – the cross-reference to a developer's marketing materials, which the table on page 56 refers, is not suitable evidence. The reference to students using the grounds in the past for relaxation and study is not relevant to the justification for designating the site as a Local Green Space now. We will seek further advice from the Council's Nature Conservation Officer on this matter.

LGS 9

The Forum would appreciate advice from Caroline

COMMUNITY FACILITIES Comment	COMMUNITY FACILITIES Forum response
<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p><b>GLA</b></p> <p>While we welcome the draft Plan's intention to promote and enhance culture in the area it restricts the provision of new facilities to music, ballet, art classes and tertiary courses such as those run by the University of the Third Age. The provision of new cultural uses should be broader and based on the needs of identified specific groups and uses in the local area, enhancing locally distinct cultural clusters. The Neighbourhood Plan should follow the guidance set out in Draft New London Plan Policy HC5.</p> <p>GLA officers welcome that Policy CF4 sets out the Plan's infrastructure priorities clearly. However, these priorities should be agreed in collaboration with the Council, taking into account draft new London Plan policy DF1, prior to the Neighbourhood Plan's publication.</p> <p><b>Online survey</b> <b>Camden Arts Centre</b></p>	<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p><b>GLA</b></p> <p>Objective 5 of the Vision and Objectives Statement notes that the area has a long-established use as a tertiary education and cultural hub , notably in Kidderpore Avenue and Arkwright Road. These important valued community facilities are consistent with the cultural interests of residents, as confirmed by responses provided to the Vision and Objectives survey of 2015. A question on potential uses for Kidderpore Hall (prior to its sale) found the greatest level of support (from a range of options) for educational use, eg by the University of the Third Age (79% agreement) and cultural events eg film screenings (78%), followed by a café (63% support), other entertainment (57%) and a crèche (57%). Additional sentence incorporated at the beginning of Policy CF1 Poliucy Intent: "An attempt to gain Asset of Community Value status for Kidderpore Hall was rejected."</p> <p>These have been agreed with ward councillors</p> <p><b>Online survey</b> <b>Camden Arts Centre</b></p>

COMMUNITY FACILITIES

We would like this section to make reference to the full public spaces available in the Centre, and therefore propose an update to:  
CF1 iii a). 'Camden Arts Centre (CAC) and its exhibition spaces, studios, education spaces, cafe and garden.'

We strongly welcome the forum's support in preserving these facilities as Asset of Community Value. We should like to suggest that the plan should also have flexibility for CAC to be reflected in section CF2 to support any future development of the facilities to continue to provide high quality arts and cultural activities for local and national audiences. This will be important to our future sustainability and ability to continue to offer our facilities free of charge.

We would also welcome working with the forum to create a specific sub-section under 'CF Cultural, Leisure and Tertiary Education and Community Facilities' which explains the full facilities and use of the Centre as listed above, and its status as a charity and Arts Council England National Portfolio Organisation. This could be repeated for other venues listed (b-g).

We would also like to liaise on the historical reference to the building use in appendices, to ensure accuracy.

It would be useful for this to be completed before the document is sent for local approval.

Important to have space for cultural activities

It would be fantastic to have an NHS GP

Equal attention should be given to all age groups, not only seniors, to foster a deeper sense of community.

Don't forget other community uses of UCS eg the Hampstead Chorus, a community choir.

"Protecting existing facilities" is too vague. It is grossly unfair, and likely to be impractical, to place special restrictions on privately owned properties such as churches, UCS or Craxton Studios. If you do so, you will discourage people from opening their properties up in the future.

Camden Arts Centre is a charity and should be allowed to operate in line with its purpose and constitution.

**Camden**

COMMUNITY FACILITIES

The outdoor café is highly valued by residents, especially those without their own gardens. It should be noted that there is no public green space in the Plan Area.

CF 1 iii a) amended to read "a) Camden Arts Centre (CAC) and its exhibition spaces, studios, education spaces, indoor and outdoor café and garden."

CF 2 iii has been added to read "Any future development of Camden Arts Centre, to enable the continued provision of high quality arts and cultural activities for local and national audiences. This is to ensure future sustainability and provision of facilities free of charge."

It has additionally been noted in Appendix CF 1 that CAC is a charity and Arts Council England National Portfolio Organisation.

No action needed

No action needed

The Plan seeks the retention and provision of facilities and activities for children

UCS Active is included within Policy CF 1, but schools have not been categorised as community facilities.

This is in accordance with Camden Local Plan Policies C2 and C3

**Camden**

<p>CF1 • Part (i) – this reads as a statement rather than policy, and would sit more comfortably within the ‘Intent’ section.</p>	<p>Moved to intent</p>
<ul style="list-style-type: none"> <li>• Part (ii) there should be an ‘and’ at the end of part (a)</li> </ul>	<p>Re-written</p>
<ul style="list-style-type: none"> <li>• Part (iii) It is unclear whether ‘greening’ of their setting is an appropriate objective for all of the facilities mentioned, which include heritage assets.</li> </ul>	<p>Re-written</p>
<ul style="list-style-type: none"> <li>• Part (iv) – it is unclear how the provision of these activities would be prioritised. Planning permission would not be required for changes within the D1 Use Class (Non-residential institutions).</li> </ul>	<p>Re-written</p>
<p>So a disused place of worship for example might become an art gallery without the need for planning permission.</p>	
<p>Paragraph 7 • This statement is misleading – the planning use runs with the land, ie. the arts centre and garden. It is not possible for the plan to state that the garden is a separate planning unit.</p>	<p>Re-written</p>
<p>Paragraph 8 • The policy can only protect the community use; it cannot require the facilities to continue operating in their current form, e.g. where they provide tertiary education facilities. Changes within the D1 Use Class and D2 Use Class (Assembly and Leisure) do not require planning permission.</p>	<p>Re-written as "This Policy aims to protect community use of the remaining cultural, leisure and tertiary education facilities...."</p>
<p>Policy CF2 New cultural, leisure, tertiary education facilities and GP Practices • “Cultural, leisure and tertiary education use classes” – these are not use classes. Most of the uses referenced in this section fall within Use Classes D1 (Non-residential institutions) and D2 (Assembly and Leisure).</p>	<p>Shared business / co-working space has been removed</p>
<ul style="list-style-type: none"> <li>• “shared business / co-working space” – the activities mentioned in i), ii) and iii) do not fit within this description.</li> </ul>	
<p>Page 82 • “New community facilities” – this might be achieved through the extension of existing community facilities to provide shared business/ co working space.</p>	<p>Not sure that Forum would wish the few existing facilities to be used in this way?</p>
<ul style="list-style-type: none"> <li>• ii) B1c and B2 relate to light industrial and general industry uses</li> <li>– it’s not clear that it is intended that such uses are intended to co-locate within a community facility.</li> </ul>	<p>Amended - thanks.</p>



We could do with more relatively lower cost housing. This is an expensive area and consequently we have an aging population. It would be great if we could get more young people living in the area and Branch Hill lodge/House

### Camden

Para. 3, page 86 • “strongly resist development” – as the sites have not been fully tested as part of a site assessment process (which includes a consideration of viability), it would not be possible for the Council to ‘strongly resist’ development if the site becomes available.

Paragraph 8 on page 87 notes that “further detailed design assessment” may be necessary for the sites, therefore the aspirational guidance could not be regarded as definitive. This statement will place undue pressure on the Council to refuse developments which might not be justified. We suggest deleting this paragraph as it goes beyond how ‘aspirational sites’ can be treated in the planning process. If this text stays in the Plan, it would trigger the need for a full Strategic Environmental Assessment (SEA) as identified in the Council’s screening opinion. This is because the wording implies the sites are ‘allocations’, rather than being aspirations that future development schemes should consider.

Para. 4, page 86 • The character of the built environment varies between the locations of the aspirational development sites. It is unlikely that an ‘average’ or hypothetical density is appropriate to all cases.

• “This density is deemed both suitable and viable for the area” – this suggests that this is the most appropriate density for all of the sites and that others may not be appropriate. However, detailed design assessment of the sites has not yet been undertaken. We suggest this is replaced with ‘It would appear this is an appropriate density for these sites’.

Para. 6, page 86 • As noted elsewhere in these comments, it would not be possible for the Council to retain the Arcadian and sylvan characteristics of every site. This should be qualified with ‘where appropriate’.

Page 87 • The term “high quality accommodation” is subjective.

• We do not consider it is beneficial to indicate a net gain/loss in numbers of persons, as it is impossible to accurately predict for the plan period. The need for homes of different sizes will inevitably change over time in light of evidence. We suggest that the table focusses on capacity for new homes, rather than people. It should be clear in the accompanying text this is ‘indicative’.

• There is no need for this section to include commentary on a previously permitted scheme. This should be deleted.

Some of the Aspirational Development Sites are likely to be developed as studio flats, eg RF 2 and RF 3, while RF 1 and RF 7 would also be suitable for young people

This is in the Hampstead NP Area

### Camden

Para. 3: changed to resist

Para. 8: “detailed design” removed

Amended accordingly

This has been retained, as it is a key vision and objective, which drives the Plan

This is based on the number of bedrooms and is important to show that larger units are also provided for, to accommodate high projected growth in the 19-29 age group (living at home) and elderly people (with live-in carers). “High quality” has been deleted. The Mount Anvil reference is important to explain the demand for larger units in the area and has been retained.

ASPIRATIONAL DEVELOPMENT SITES

Para. 7, page 87 • Not all of these developments would be expected to provide new community facilities, as they would be under the threshold set out in Camden Planning Guidance. They may, however, provide funding for local Community Infrastructure Levy priorities.

Suggest rewording as follows: "The eleven aspirational development sites identified by the Plan would help to meet GLA population growth projections for the Frognaal and Fitzjohn's ward to 2041 and to provide may provide funding for local infrastructure, including the community facilities, needed to support a growing population".

All aspirational development sites • There is no need to identify the owners/leaseholders of the sites/buildings concerned because they could change over the plan period and this is not a planning consideration. We suggest all of these references are removed.

Meridian House

- The aspiration does not consider the sustainability impacts of demolishing a relatively new building.
- "in accordance with" – this should be more flexible, as alternative design approaches could be justified. We suggest replacing with 'informed by'.
- It does not seem to be reasonable to expect "substantial greening and biodiversity measures", including a pond and hedgerows for a town centre/off town centre site. Suggest deleting the word 'substantial'.
- "It is possible that the site is available, and the Forum will need to liase with Network Rail" – all landowners / statutory undertakers affected by the proposal should be consulted on the draft Plan's proposals.
- "in brick or stone" – this is unduly prescriptive and should be removed. Paragraph 127 of the NPPF states that: "decisions should ensure that :developments (c) sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)".

27 Redington Gardens

- It is unclear that the daylighting of the stream is a necessary means of managing flood risk.
- "A new development would be expected to adhere to the Redington Frognaal Design Code" – this goes beyond a site aspiration. Suggest "would be expected to adhere to" is replaced by 'should be informed by'.

1 Platts Lane

- The site seems too small to support a new primary school, which would be expected to provide on-site open space. Information about the accommodation requirements of Camden's school service should be sought.
  - "the Neighbourhood Plan would support a development that adheres to the Redington Frognaal Housing and Development Policy and Design Code" – this goes beyond a site aspiration.
- Suggest: 'a development should be informed by...and maximise the oppotunity for....'

ASPIRATIONAL DEVELOPMENT SITES

"Where possible" added. The Plan Area no longer has any buildings which could be supported by CIL for community use, as buildings have been sold off for residential development.

References have been removed

"Although it is a relatively recent block, buildings dating from the 1960s have already been or are due to be demolished and replaced, eg in Redington Road and Redington Gardens." has been added. "Substantial" has been retained as residents are very eager to see substantial greening of Finchley Road and a wild pocket park is also planned. Brick or stone would be in keeping preserve and enhance the Conservation Area architecture of the surrounding mansion blocks and listed Victorian shopefronts.

Changed to "would be expected to be informed by....."

Changed to: "the Neighbourhood Plan would support a development that is informed by the Redington Frognaal Building and Development Policy and Design Code and maximises the opportunity for tree planting, to help counter current high particulate levels."

Garages (eight) on south side of Frogal Lane

- “This is not consistent with Camden’s land use and sustainable transport policies and” – the development may have been acceptable when tested against Camden’s previous planning policies. Suggest this text is removed. The issue is that garages don’t tend to use land efficiently – but there is a risk of the parking being displaced elsewhere and this would need to be considered.
- “which does not obscure the daylight to the house” – this could cause confusion. The test is whether the impacts would be acceptable: ie. whether harm would be created, and if so, whether this could be mitigated. Suggest replacing with: ‘subject to any impacts on amenity being satisfactorily addressed’.

Garages and land to rear of 23-27A Frogal

- “must not cause overlooking, loss of natural light and /or loss of privacy” – the test is whether the impacts would be acceptable: ie. whether harm would be created, and if so, whether this could be mitigated. Suggest replacing with: ‘subject to any impacts on amenity being satisfactorily addressed’.
- It is overly prescriptive to expect the site to provide a “substantial permeable soft surface” or pond.

Hampstead Gate, 1A Frogal, London

- The aspiration does not consider the sustainability impacts of demolishing a number of relatively new buildings.
- “The present ownership structure of the site could cause complications for a developer wishing to acquire the entire site” – the Council would not wish to see this site redeveloped in a piecemeal fashion.
- It is overly prescriptive to expect the site to provide a pond.
- “the Plan would support a scheme” – this wording is appropriate for a site allocation; it goes beyond an aspiration. Development ‘should be informed by...’ the Design Code.
- “Bleak area” – this is highly subjective – we suggest this is removed.

Rear of 166-200A Finchley Road

- The existing accommodation is not being tested against the current London Plan. Suggest this is reworded to a general observation about why the accommodation might be poor quality.
- Development ‘should be informed by’, rather than expected to adhere to the Design Code.
- “Amount of development: c.36 units” – it is unclear whether this figure is net or gross. What number of units would be gained by this proposal.

282-284 Finchley Road

- “It is possible, if offers were made, the owners might be pleased to sell” – the Neighbourhood Plan does not need to speculate on the intentions of landowners.

Changed to: "This is not an efficient land use, is not consistent with sustainable transport policies....."

Amended as suggested

The text has been clarified to note that redevelopment (rather than demolition) is sought. "Support" changed to "encourage" and "bleak" removed.

Re-worded

Amended accordingly

Kidderpore Hall

- It is not clear who the quote comes from in the 'Constraints' section – it is not necessary to include this information in a neighbourhood plan.
- The “sworn affidavits” appears to refer to an assessment of a previous scheme – it is unclear it is needed as part of this aspiration. Suggest general observation about how the Hall has been a long-standing community facility in the past.
- ACVs are assessed outside of planning legislation. This text should be deleted – it is not relevant to the aspiration.
- Alternative residential schemes – e.g. subdivision would need to be considered on their relevant planning merits and heritage impacts. The quote seems to pre-suppose that no other scheme is likely to be acceptable.
- It is extremely difficult to see how any part of the hall could come back into community use when there is a planning permission for it to be converted into residential accommodation.

24 Redington Gardens

- It is unclear whether the opening up of the river is necessary for managing flood risk.
- “The proposals are considered objectionable...” detailed objections to a previously consented scheme do not need to form part of a neighbourhood plan. The aspiration should focus on the outcomes anticipated from a revised scheme.
- Any scheme ‘should be informed by’ the Design Code.
- It is welcomed that this proposal could potentially increase the provision of homes on the site.

Para, 10, Page

105 • The role of this section is to identify ‘aspirations’ for potential development sites – not to consider schemes for applications.

- It is not clear what “it will address those which may not comply” is intended to mean. It should be clear that separate to the neighbourhood planning process, applicants can submit planning applications for these sites to the Council at any time.
  - “Presumption against demolition of heritage assets” – the Council has made comments above that heritage assets must be protected according to their significance and in line with relevant legislation and the National Planning Policy Framework. This means, for example, that we cannot insist on the retention of any neutral contributor to the conservation area.
  - “Overdevelopment of greenspaces” – the Plan already includes policies setting out exactly how greenspaces should be protected.
- It is not necessary to reference this again here.

Footnote reinstated. The aspiration for return to community use has been retained

The desirability of managing flood risk has been clarified. The reference to the previous scheme has been retained as it helps explain the need for the RedFrog design codes.

This text has been deleted.

FINCHLEY ROAD RESIDENTIAL AND RETAIL Comment	FINCHLEY ROAD RESIDENTIAL AND RETAIL Forum response
<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> FR1. We would suggest that policy FR1.i could be strengthened through providing an audit of shop-fronts of townscape merit which it is desirable to retain. This would have the advantage of identifying shop-fronts of merit which post-date the Edwardian period but may be of architectural merit, rather than imposing blanket policy on Victorian and Edwardian shop-fronts (although we acknowledge well preserved examples are likely to make a significant contribution to local character)..</p> <p><b>TfL</b></p> <p>The document lacks any mention of the Mayors Transport Strategy (MTS) which forms an integral part of Mayoral Policy</p> <p>The document contains multiple references to Cycle Superhighway 11(CS11). TfL is currently considering next steps for the rest of the CS11 route, from Swiss Cottage to the West End, following a recent judicial review hearing.</p> <p>Policy FR 2 (i) states the wishes of the forum if CS11 is constructed through the area. TfL welcome the opinion of the group and if CS11 is constructed TfL will look at the feasibility of these wishes if plans for CS11 progress through the area.</p> <p>It is welcomed by TfL that the plan acknowledges the need for cycle parking but not at the cost of reducing the width of the pavement, as stated in Policy FR 2 (vi).</p> <p>It is important that the plan should highlight that any proposed works on Finchley Road are required to be agreed with TfL.</p> <p>Appendix FR 2 (3) identifies the TfL Healthy Streets indicators. However the applicant should refer to the initiative being a TfL led approach as opposed to a campaign group.</p> <p>It is welcomed that the Neighbourhood Plan group acknowledges TfL's Streetscape Guidance in their proposals for Finchley Road and this should be strongly adhered to for all aspects of the TLRN.</p>	<p><b>Thames Water</b> No comments</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b></p> <p>Recommendation added "An audit should be undertaken to assess shopfronts of townscape merit which it is desirable to retain."</p> <p><b>TfL</b></p> <p>New paragraph added into Introduction: "The Mayor's Transport Strategy notes that "London's streets should be for active travel and social interaction, but too often they are places for cars, not people" and this is fully supported by Policy FR 1 and Appendix FR 2: Finchley Road Non-Planning Community Aspirations."</p> <p>No action needed</p> <p>No action needed</p> <p>This has been removed</p> <p>This has been added under Recommendations in APPENDIX FR 2: FINCHLEY ROAD NON-PLANNING COMMUNITY ASPIRATIONS</p> <p>This has been corrected</p> <p>No action needed</p>

Appendix FR 2 (9) relates to the desire of accommodating a common utilities duct. As previously stated, TfL would like to highlight that this approach may be unfeasible due to the difficulty of accommodating cables for different services within shared ducts. TfL Spatial Planning seeks clarification from the Neighbourhood Planning Group whether the feasibility of the common utilities duct has been explored in more detail. Further dialogue with TfL will be required in order to understand how the group think this will work.

FR2(iv) Where pavement width can be maximised, any proposed trees on the TLRN need to be agreed with TfL

TfL welcomes the plans commitment to improve cycling facilities in the area and welcome the reference to TfL's Healthy Streets initiative. However the document lacks any mention of the Mayors Transport Strategy (MTS) which forms an integral part of Mayoral Policy.

It is welcomed that the Neighbourhood Plan group acknowledges TfL's Streetscape Guidance in their proposals for Finchley Road and this should be strongly adhered to for all aspects of the TLRN.

FR2 (10), TfL would like to inform the Neighbourhood Plan Group that TfL use 'Thin Surface Course System' for their road surfacing. This is a form of quiet road surface which reduces road noise, improves drainage and reduces splash and spray in the rain.

Policy FR 2, paragraph 18 shows a number of proposed pedestrian crossing. Any new pedestrian crossing across Finchley Road will have to be agreed with TfL prior to approval as new crossings could interfere with other highway activities across the TLRN. TfL needs to balance the needs of all road users.

TfL recognise the importance of pedestrian safety across London and that is why we have created the Vision Zero initiative, to have no serious injuries or deaths on London's roads by 2041. Following this, TfL acknowledge that there is an issue on Finchley Road with pedestrian safety. Policy FR2 (18) shows the locations of the proposed four crossings. It is noted that two of the points already have crossings in close proximity to one another and these would raise concerns about the impact on bus journey times and other key impacts. The group should be reminded that TfL are unable to pay for these works at this time.

Albeit TfL note there is an issue and are being proactive to address this and have managed to secure funding for a feasibility study to be carried out to for a new crossing at the junction of Froggnal Lane, Westend Lane, Aveny Garden and Finchley Road. Feasibility work will be carried out and the group informed accordingly.

New text added: "It therefore supports the diversion and rationalisation of utilities to allow more space beneath the footway. This could be achieved....."

"This will need to be agreed with TfL." added to iv and v

New ;pafragraph added under Appendix FR 2 Intent :4. The Mayor's Transport Strategy aims for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041."

Policy text box iii changed from "supported" to " should be strongly adhered to".

Rext amenderd to "Notwithstanding TfL's use of 'Thin Surface Course System' for road surfacing, the Forum seek a quieter road surface, such as porous asphalt, which would serve to further reduce road noise, improve drainage and reduce splash and spray in the rain."

No action needed.

FR 2 paragraph 20, the loss of the 82 bus route in the area has resulted in reduced bus frequencies in an already overcrowded section of the 13 and 113 bus routes. TfL believe that there is sufficient capacity on the corridor with a peak hour frequency of 22 buses per hour on the corridor.

FR 2 paragraph 19 states that all bus shelters are to incorporate Countdown Boards, providing customers with live bus information. TfL are open to discussion about the possibility of these boards, however there are currently no funding available for this, so external contributions would be required.

### **Online survey**

We would like to highlight the inadequacy of pedestrian crossing points across the Finchley Road, especially at the junction with Fortune Green/Platt's Lane. This is an important entry point to the Redfrog area and is used by many school children (including those going to St Luke's School, Kidderpore Avenue). It is an exceptionally dangerous crossing and TFL/Camden need to be encouraged to take action.

Needs tree planting and other greenery

Finchley Road has become run down in recent years and this policy will hopefully lead to its regeneration.

Finchley Road is fairly ugly below the junction with Hermitage Lane/Cricklewood Lane. All attempts to improve it can only be positivd.

How did this happen? Finchley Road is filthy and run down

The whole of Finchley Rd is horribly degraded and will get infinitely worse if and when a cycle track is crammed into it

I think it's such a main thoroughfare that change is inevitable

I suspect that Finchley Road maybe well past saving.

In the first instance, it would help if unnecessary Street Furniture was removed. We have an excess of sign-posts, mobile phone boxes etc which could be removed

shopfronts are a disgrace

### **Camden**

No action needed.

### **Online survey**

This has been added as a recommendation to Appendix FR 2: "Major improvement is needed to the pedestrian crossing point across the Finchley Road at the junction with Fortune Green Road and Platt's Lane. This is an important entry point to the RedFrog area and is used by many school children (including those going to St Luke's School in Kidderpore Avenue). It is an exceptionally dangerous crossing and TFL/Camden should take urgent action to remedy this situation."

Dependent on action by TfL

An audit of shop fronts is to be arranged

Largely dependent on action by TfL

Largely dependent on action by TfL

Opportunities for tree planting and greening will be sought as mitigation measures when CS 11 is constructed

No action needed

Largely dependent on action by TfL

An audit of shop fronts is to be arranged

### **Camden**

FR1, Page 107 • “compatible with a Conservation Area” – footways vary throughout the conservation area. It may be better to say appropriate for the local character or streetscene.

- The Council cannot require development to use “common utilities ducts” – it is not a planning matter.
- It is unclear to what extent widening pavements is a realistic aspiration. Finchley Road is a major route into London and it would be unacceptable to widen pavements if this was at the expense of provision for cyclists.

Para.8, Page 109 • The term “original shopfront” is likely to cause confusion. We understand that the intention of the policy is to protect good examples of traditional Victorian/Edwardian shopfronts, not any shopfront.

- The Council could not require a traditional shopfront to be reinstated. This would be unreasonable and is likely to conflict with paragraph 55 of the NPPF states: “Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects”. We are more likely to be able to seek replacement shopfronts where traditional shopfronts predominant, ie. development would provide an opportunity to restore a cohesive group.

Footway suggestion has been amended, as advised and common utilities duct removed. There is an opportunity for the pavement to be widened through the aspirational development for Meridien House. The Plan is also anticipating a future where there will be fewer cars on the road:

<https://webcache.googleusercontent.com/search?q=cache:n0ibNrW7y0MJ:https://www.standard.co.uk/news/london/one-of-central-london-s-most-trafficinfested-streets-could-be-turned-into-green-boulevard-a3657986.html+&cd=7&hl=en&ct=clnk&gl=uk> and <https://www.dailymail.co.uk/news/article-4978362/Fleet-Street-traffic-free-green-boulevard.html>

"Original" has been changed to Victorian or Edwardian.

Heritage has been used to successfully regenerate Holloway Road and other defraded streets, eg: <https://historicengland.org.uk/content/docs/get-involved/translating-good-growth-london-historic-environment-120717-pdf/>

UNDERGROUND WATER FEATURES Comment	UNDERGROUND WATER FEATURES Forum response
<p><b>Thames Water</b> We also support Policies UWF1 and UWF2 which relate to basement development</p> <p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p><b>Online survey</b> Basement Excavation should be prohibited for all the reasons given against it in the Neighbourhood Plan. There is very little awareness of the water beneath the ground here and the many underground streams. I think this is extremely important given the amount of water running off the Heath. Basement excavation is not NECESSARY, but an indulgence of greed. Many years ago Camden council said it would cease granting planning permission for these schemes, because of their adverse impact.  Why has this still not be implemented? Too much damage has already been done. Cumulative impact needs to be taken into greater consideration.  (Where are the underground rivers diverted to? For example beneath Number 16 Hollycroft Avenue).  Generally supportive of the policy to protect underground water, however it needs to be implemented pragmatically. The construction of basements whilst temporarily annoying for neighbours, is a great way of increasing housing density without permanently harming the amenity, or character of the area. And with housing / basement construction costs materially less than the value per sq ft of a larger property, plus the very significant government stamp duty incurred if moving home, basement construction can permit families to grow and afford to stay in the area. Basement excavation damages the whole environment including neighbouring buildings and should never be encouraged STOP THE BASEMENTS - what has happened to planning control?  Excavations are ruining the lives of council tax paying residents and neighbours.</p>	<p><b>Natural England</b> No comments</p> <p><b>National Grid</b> No comments</p> <p><b>Historic England</b> No comments</p> <p>The NP must be in conformity with Camden Local Plan Policies, but they can be adapted to RF circumstances The Forum are developing the Watermark project to mark the direction and flow of underground streams No action needed</p> <p>The NP must be in conformity with Camden Local Plan Policies, but they can be adapted to RF circumstances</p> <p>The UWF Policy should help address these concerns and developers will be required to take account of the underground streams and springs, which have been mapped.</p> <p>The policy attempts to impose safeguards, and does not aim to restrict development, if responsibly undertaken</p> <p>The policy attempts to impose safeguards and responsible development</p> <p>The policy attempts to impose safeguards and responsible development.</p>

**UNDERGROUND WATER FEATURES**

Couldn't be more important

Whilst additional reports sound good, developers are adept at paying and sourcing the report they want. All too often they are the winner with the power of money behind them.

As a condition there should be a substantial fee for basement development of £25,000 which Camden or Redfrog should use to get a decent Independent assessment done and not rely on the developer doing the report.

Very strongly agree with this. Basement excavations do cause irreversible changes to the underground streams and damage not only the green spaces and trees but cause irreparable or extremely costly damage to the buildings and houses above them.

**Camden**

Para. 2, page 110 Party Wall Act matters are dealt with through separate legislation and cannot be dealt with through planning policy.

Para. 3, page 110 "The need to submit engineering calculations prior to the determination of a planning application was affirmed": the need for engineering calculations is application specific, but we concur that in almost all cases, structural engineering input will be required and this will usually include calculations. It would not be reasonable to expect all basement schemes to provide calculations as these will be secured through the Council's BIA process, commensurate with the scale and location of the scheme. This includes investigations, analyses and reports which are needed to identify the magnitude of any impacts on stability and the water environment and allow suitable mitigation measures to be determined.

The BIA's role at planning stage is to demonstrate that a subterranean development can be constructed on the particular site having regard to the site, existing structural conditions and geology. It is not meant to prescribe the engineering techniques that must be used during construction; for many basements, these cannot be known at planning stage. Reference to the widely adopted RIBA work stages shows that planning applications are typically made with "proposals for structural design". Technical design follows later.

No action needed

Legal advice will be sought

The UWF Policy should help address these concerns and developers will be required to take account of the underground streams and springs, which have been mapped.

**Camden**

Residents report that the BIA requirements have been insufficient to resolve all the matters that arise and, instead, neighbours are left having to resolve issues through the Party Wall Act. Camden's own survey of the impact of basement construction on Hampstead residents shows that, in the 26 cases where Party Wall Agreements were entered into, only 5 (19%) of neighbours achieved what they had wanted from the Agreement.

**UNDERGROUND WATER FEATURES**

Basements are not standard building work but often complex engineering processes (Eatherley v London Borough of Camden and another [2016] EWHC 3108 (Admin)) and that RIBA work stages will not be best practice for basement construction. Indeed, residents have found that these work stages have left their properties insufficiently protected and at risk of damage. The following sentence has been added, "The Forum note, however, that the need for engineering calculations is application specific, although in almost all cases, structural engineering input and calculations will be required." An additional point i) has been added to UWF 2 policy gtext box, "i. All engineering calculations and specifications that can be provided before commissioning a building contractor, should be made public at the earliest possible stage."

▷

UWF 1 part (v) "An assessment of current ground and geology conditions, topography and groundwater levels will be required. This should include details of the structure and foundations of the existing building and neighbouring properties" – It may not be possible for the applicant to determine details of the structure and foundations of neighbouring properties so we do not consider this can be made a requirement. The policy should be amended to state 'where possible'. Where this is pertinent, the applicant could make conservative defensible assumptions.

Para. 15, page 113 We welcome that the 'zone of influence' is now to be determined based on a scoping exercise, whereas previously the text referred to an arbitrary figure (ie. 100 metres). The text in part (i) of Policy UWF1 needs to be amended to reflect this approach.

Para. 21, page 114 "Moreover, the independent assessor does not always meticulously scrutinise the basement impact assessments" – this assertion should be removed from the draft Plan. It is not appropriate for the Neighbourhood Plan to critique the Council's advisers. We also do not agree that this harm is the result of the Council's planning process and this text should be removed.

Para. 22, page 115 We consider that Camden's requirements, especially now we have published our 'Scope of services' document and BIA proforma are very closely aligned with the RBK&C guidance. Reference to RBK&C should be removed because it is not something that the Council's Development Management Officers can be expected to consider.

UWF2 Part i) "Engineering design should be advanced to...." This has been superseded by a new set of stages in 2013 – 1 to 7. Planning applications are normally developed to RIBA Stage 3. This is the equivalent of RIBA Stage D. We would expect RIBA Stage 2 as a minimum.

UWF2 Part ii) c) This seems to repeat part b).

UWF2 Part ii) d) "An interpretative report will not be sufficient" – this needs to allow some flexibility. We suggest: "An interpretative report will not generally be sufficient".

UWF2 Part (iii) We are unclear what this means.

UWF2 Part (vi) BCPs are only requested by the Council in limited cases, as set out in Camden Planning Guidance: Basements. It is the purpose of the BIA itself to demonstrate that a basement can be constructed without unacceptable impacts on stability and the water environment.

▷

This is the wording used by Hampstead Neighbourhood Plan, policy BA 1 para 5.12 d), and has been retained

Text corrected to read ".....within the zone of influence, as determined by the scoping exercise...."

These criticisms, including by Dr. Michael de Freitas, are in the public domain and are important to explain the need for this policy. Dr. de Freitas has confirmed his criticisms in an email of 4.3.19. Camden's own survey of damage to neighbouring properties also confirms the considerable externalities of basement excavation.

This has been deleted

Corrected, thank you.

Corrected, thank you.

Amended accordingly

This has been replaced by Hampstead NP wording: "e. Hydrological modelling to show whether it will be possible through the inclusion of drainage systems to prevent any significant harm from changes to groundwater levels or flow. Hydrological modelling only needs to be done if it cannot be demonstrated through screening and scoping that there is no risk."

This has been amended to read: "vi. Where a BCP is requested (as set out in CPG: Basements), the BCP should be written by a structural engineer, and submitted alongside the BIA at the time of applying for planning consent. The BCP should set out ways in which potential problems arising from cumulative impacts on ground stability and underground water movements will be resolved."

Advice received from Hampstead NF to add sub policy on Basement Construction Plans

UWF 3 Basement Construction Plans has been introduced (copied from Hampstead NP) as follows.

#### UWF 3: BASEMENT CONSTRUCTION MANAGEMENT PLANS

Basement Construction Management Plans should include limits on hours of construction as set out in the policy text box below.

The Plan recommends that work on basements should be limited to 8am-6pm on Mondays to Fridays only.

#### Basement Construction Management Plans

i. High impact activities will be restricted to 9 am till noon and 2 pm till 5.30 pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays.

High impact activities include:

- a. Demolition, ground breaking and excavation works using percussive equipment.
- b. Percussive piling operations and percussive pile reduction and pile break-out works.
- c. Percussive and grinding power tools on party walls/floors of adjoining occupied properties.
- d. Removal of clay and sub soil during excavation by means of conveyor belts, lorries, etc.

POLICIES OVERALL	POLICIES OVERALL Comment	POLICIES OVERALL	POLICIES OVERALL Forum response
POLICIES OVERALL	<p><b>On-line survey</b></p> <p>Subject to our comments in relation to 1 Platt's Lane and the importance of protecting the green corridor north of Platt's Lane parallel to the Finchley Road, we are happy to endorse the policies.</p> <p>Conservation Area status has patently failed to preserve and enhance.</p> <p>The policies have been carefully prepared and evidence based and therefore merit widespread support.</p> <p>Policies need to be as robust as possible and unchallengeable!</p> <p>Priorities should be to maintain character of area without negating history of avant-garde architecture. The worst thing for the area would be to become a Hampstead version of the tedious monotony of Hampstead Garden Suburb.</p> <p>There is a lot of development pressure in this area and whilst of course things have to progress, its important that new developments enhance and improve the neighbourhood. Sadly in many cases development degrades those attributes that make this an attractive area to live.</p> <p>see above</p> <p>In order to keep the special character and beauty of this neighborhood an overall policy for developments are necessary.</p>	POLICIES OVERALL	<p><b>On-line survey</b></p> <p>Review aspirational development site RF 3</p> <p>No action needed</p> <p>No action needed</p> <p>Probably no further action possible</p> <p>The RF NP Area is very different from HGS with its modest 2-storey buildings and small / ornamental trees. The RF NPA Area is characterised by large houses by a variety of architects, mature vegetation and large-canopy trees.</p> <p>Design Codes should be beneficial</p> <p>No action needed</p>

POLICIES OVERALL - AGREEMENT / DISAGREEMENT - Online survey											
	Agree strongly		Agree		Don't know		Disagree		Total responses		Weighted average score
	%	No.	%	No.	%	No.	%	No.	Answers	Skipped	
BD: Do you support the policies overall to guide future development of the area?	77.94%	53	19.12%	13	1.47%	1	1.47%	1	69	4	3.64
BD 4: Do you agree with the introduction of design codes for new development?	79.71%	55	15.94%	11	1.45%	1	2.90%	2	69	3	3.72
BG1: Do you agree with this policy to guide future development of the area?	82.61%	57	14.49%	10	1.45%	1	1.45%	1	69	3	3.78
CF: Do you agree with these facilities to sustain future development of the area?	67.14%	47	24.29%	17	5.71%	4	2.86%	2	70	3	3.56
FR: Do you agree with this policy to guide future development of the area?	78.26%	54	20.29%	14	0.00%	0	1.45%	1	69	3	3.96
DS: Do you agree with this policy to guide future development of the area?	52.94%	36	38.24%	26	8.82%	6	0.00%	0	68	5	3.44
UWF: Do you agree with this policy to guide future development of the area?	84.06%	58	10.14%	7	4.35%	3	1.45%	1	69	3	3.77

LOCAL GREEN SPACES SUPPORT - Online survey														
	Supports trees, including mature trees		Provides habitat for wildlife (including foraging or commuting)		Visible from the street or from windows of nearby flats		Provides an area of tranquility in an urban setting		Historical significance		Promotes health and well being, exercise or social interaction		Total	
	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	No.	
LGS 1 West Heath Lawn Tennis Club	76.5%	39	56.9%	29	58.8%	30	70.6%	36	45.1%	23	92.2%	47	51	
LGS 2 Kidderpore Reservoir (behind Platt's Lane). In the event that this site becomes surplus to the needs of Thames Water, the Forum may wish to designate it as a nature reserve.	74.0%	37	74.0%	37	66.0%	33	86.0%	43	52.0%	26	44.0%	22	50	
LGS 3 Tennis courts to the rear of Windsor Court in Platt's Lane	47.5%	19	40.0%	16	57.5%	23	52.5%	21	25.0%	10	90.0%	36	40	
LGS 4 Froggnal Lane Gardens. This is a communal garden, which is designated as a Local Site of Importance for Nature Conservation	90.0%	45	90.0%	45	72.0%	36	86.0%	43	48.0%	24	64.0%	32	50	
LGS 5 Embankment between Platt's Lane and Telegraph Hill with mature / veteran trees. This was the site of an optical telegraph station constructed by the Admiralty during the Napoleonic wars as a means of communication with the fleet where the beacon was lit to carry the tidings of the Spanish Armada. Additionally, it marked the Anglo-Saxon boundary between Hampstead and Hendon.	92.2%	47	68.6%	35	60.8%	31	62.8%	32	68.6%	35	37.3%	19	51	
LGS 6 The entire lawned and planted area of Studholme Court (on Finchley Road). This includes many fruit trees and provides a green outlook for Studholme residents. The green area and the fruit trees were specified by Marie Studholme, the former actress and singer known for her roles in Victorian and Edwardian musicals.	92.0%	46	70.0%	35	74.0%	37	76.0%	38	46.0%	23	52.0%	26	50	
LGS 7 Rear garden at Camden Arts Centre, Arkwright Road. This is open to the public	94.4%	51	79.6%	43	72.2%	39	88.9%	48	46.3%	25	75.9%	41	54	
LGS 8 Copse to the rear of 17 Froggnal. This is the last remaining area of woodland behind Finchley Road and has a number of trees with preservation orders (TPOs). Bats and birds have been recorded there.	94.2%	49	90.4%	47	69.2%	36	73.1%	38	38.5%	20	46.2%	24	52	
LGS 9 Formerly a Site of Interest for Nature Conservation, this is located at the previous King's College campus in Kidderpore Avenue and had formed a green backdrop for properties in Finchely Road. Although currently a building site, the developer has undertaken to restore and enhance the site's value to nature.	89.6%	43	85.4%	41	79.2%	38	75.0%	36	54.2%	26	62.5%	30	48	

## APPENDIX 2: Redington Frogna! Neighbourhood Forum Redesignation

Consultation schedule of responses and Council comments (consultation ran from 6th August – 1<sup>st</sup> October 2019)

No.	Consultee	Consultee Comments	Council Response
1	Resident	I support the formation and continuation of the forum	Noted
2	Resident	I should like to support the redesignation of the Redington Frogna! Neighbourhood Forum for a further 5 years. It is very important that the much needed neighbourhood Plan is completed and monitored/implemented.	Noted
3	Residents	We support the re-designation of the above for the next five years.	Noted
4	Andrew Dismore AM	<p>I am writing to follow up on news that that the consultation for the re-designation of the Hampstead Neighbourhood Forum and the Redington Frogna! Neighbourhood Forum has been launched. Both Forums were established in 2014 and after five years in operation must now reapply to continue to be formally designated for a further five years.</p> <p>I support this re-designation and welcome the benefits, such as the importance of the Forum's work reviewing planning applications and monitoring the effectiveness of the Neighbourhood Plan. They will also be reviewing Camden proposals, working on traffic and transports issues affecting the area, revising the conservation area statements and, of course, helping local Councillors set CIL priorities by undertaking an annual consultation.</p> <p>If the Council approves the applications, the Hampstead Neighbourhood Forum will be able to formally amend the adopted Hampstead Neighbourhood Plan and the Redington Frogna! Neighbourhood Forum will be able to continue preparation of a neighbourhood plan in their area.</p> <p>I believe there is strong local support for re-designation, noting that the decision to seek redesignation was supported at their last AGMs.</p> <p>I therefore hope the Council will agree to re-designation.</p>	Noted

No.	Consultee	Consultee Comments	Council Response
5	Residents	<p>I write to express support for the designation of Redington Frogna! Neighbourhood Forum for a further five years and in support of Chairman Rupert Terry and Secretary Nancy Mayo for their outstanding contribution over the years.</p> <p>Furthermore, I strongly support the draft Redington Frogna! Neighbourhood Plan (Revised), which will no doubt make a real difference to preserving the Neighbourhood Plan area in this setting.</p>	Noted
6	Residents	This is to advise that we are in favour of a redesignation of the Redfrog Neighbourhood Forum for a further 5 years	Noted
7	Resident	I support the re-designation of the Redington Frogna! Neighbourhood Forum for a further 5 years.	Noted
8	Canal & River Trust	I can confirm that as the Canal & River Trust has no assets in the Neighbourhood Forum areas of Hampstead and Redington Frogna!, then we have no comments to make.	Noted
9	Residents	This is to confirm our support for the re-designation of the Redington Frogna! Neighbourhood Forum for a further five years.	Noted
10	Resident	I wish to add my support for the policies proposed by the Neighbourhood Forum and now currently being modified	Noted
11	Resident	We are emailing to express our support for the re-designation of the Redington Frogna! Neighbourhood Forum for a further five years.	Noted
12	Resident	I would like to express my support for the re-designation of the Redington Frogna! Neighbourhood forum for a further 5 years.	Noted
13	Resident	I would like to strongly support the re-designation of the Redington Frogna! Neighbourhood Forum.	Noted
14	Highways England	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.	Noted

No.	Consultee	Consultee Comments	Council Response
		Having examined the re-designation of the Hampstead Neighbourhood Forum and Redington Frogna Neighbourhood Forum documents, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time.	
15	Resident	I support for the re-designation of the Redington Frogna Neighbourhood Forum for a further five years.	Noted
16	Resident	I strongly support the applications for the redesignation of both the Hampstead Neighbourhood Forum and the Redington Frogna Neighbourhood Forum.  In my view they both are doing a good job in protecting the character of their neighbourhoods as well as enhancing their facilities and encouraging community engagement.	Noted
17	Resident	I should like to support the re-designation of Redington Frogna Neighbourhood Forum for a further five years. I strongly support the draft Redington Frogna Neighbourhood Plan (Revised), which will make a real difference to preserving the Neighbourhood Plan area and its setting.	Noted
18	Resident	Please note my support for the above. It is a vital part of Local Democracy.	Noted
19	Resident	I support the re-designation of the Redington Frogna Neighbourhood Forum for a further five years.	Noted
20	Resident	I would like to register my support for the re-designation of the Redington Frogna Neighbourhood Forum for a further five years.	Noted
21	Resident	I am writing to confirm my support for the re-designation of the Redfrog Neighbourhood Forum. The work undertaken by the RNF has a positive impact on our local community.	Noted
22	Resident	This is to confirm my support for the redesignation of the above Forum	Noted
23	Resident	This is such a valuable contribution to the neighbourhood- we really support it	Noted
24	Resident	I fully support the re-designation of Redington Frogna Neighbourhood Forum. I think they are doing an excellent job in getting the local plan through the consultation process.	Noted
25	National Grid	National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK.	Noted

No.	Consultee	Consultee Comments	Council Response
		<p>The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	
26	Resident	This is to support the redesignation of both the Hampstead and the Redfrog Neighbourhood Forum. The Forum is doing on-going work reviewing application and monitoring the effectiveness of the Neighbourhood Plan. The Forums would like to continue reviewing Camden proposals, working on traffic and transport affecting the area, revising the conservation area statements and input on CIL.	Noted
27	Resident	I can support the re-designation of the Redington Frogna Neighbourhood Forum	Noted
28	Resident	We support the re-designation of the Redington Frogna Neighbourhood Forum; it has been a very useful forum for promoting the needs of local residents.	Noted

No.	Consultee	Consultee Comments	Council Response
29	Resident	I fully support the redesignation of RedFrog Neighbourhood Forum. This forum is paramount to the future protection of our neighbourhood.	Noted
30	Resident	I support the re-designation of the Redington Frogal Neighbourhood Forum for a further five years.	Noted
31	Resident	This is to just support the re-designation of Redington Frogal Neighbourhood Forum for a further five years.	Noted
32	Resident	I should like to support the re-designation of Redington Frogal Neighbourhood Forum for a further five years. I strongly support the draft Redington Frogal Neighbourhood Plan (Revised), which will make a real difference to preserving the Neighbourhood Plan area and its setting.	Noted
33	Resident	As member of Redington we are supporting the re designation of the Redington Neighbourhood Forum for a further five years	Noted
34	Resident	I support the re-designation of the neighbourhood plan for Redfrog	Noted
35	Resident	It is vital that the Hampstead and Redfrog area be represented at all Camden Council meetings and that they should have a balanced, democratic voice.	Noted
36	Resident	As a resident of Platt's Lane for 29 years, I have greatly appreciated the valuable local engagement and contribution made by the Redington Frogal Neighbourhood Forum. I strongly support the Forum's re-designation for a further 5 years.	Noted
37	Resident	<p>I am writing to show our support for the re-designation of the Redington Frogal Neighborhood Forum.</p> <p>RedFrog provides an invaluable service and support for the local community in helping maintain the character and charm of the neighborhood. We need the Forum in order to have a coherent and unified voice when proposing or opposing ideas that directly affect the neighborhood and its residents.</p> <p>Nancy who works for Redfrog has been extremely supportive, giving excellent advice in our attempt to prevent the Listed James Gowan Swimming Pool from being demolished.</p>	Noted
38	Resident	I support Redington Frogal Neighbourhood Forum for a further five years.	Noted

Second Regulation 14 from 14.6.19 until 5.8.19 – Consultee Comments and Forum Responses		
SD	Camden comments, 5.8.19	Forum response
2.1.1 – Intent	<p><b>Sustainable Development</b></p> <p>Typo – “Sites of Interest or Nature Conservation”. They are ‘Sites of Importance for Nature Conservation’</p>	This has been corrected.
SD1 – Criterion i1	<p>G5: Urban Greening.</p> <p>The London Plan policy states that the UGF is to be applied to major developments and suggests target scores based on the size of scheme (for “predominantly residential” and “predominantly commercial” developments).</p> <p>The Redfrog Plan extends the approach to cover all development when not all development will impact on biodiversity. Where an impact would arise, it is not clear how the policy should be applied because the target(s) are not stated. For the avoidance of doubt, it should be stated that the ‘interim’ targets in the London Plan are to apply.</p> <p>The policy needs to be clear that UGF is intended to be applied to major schemes. The status of the LP also needs to be briefly mentioned because the implementation of UGF will be contingent on the Panel of Inspectors’ report.</p>	<p>Advice to government from the Natural Capital Committee is that a biodiversity net environmental gain approach should be developed as a priority and then introduced as soon as practicable.</p> <p>However, criterion i has reluctantly been changed to "All development must have no adverse impact on biodiversity and wildlife habitat" and ii to "The achievement of a net gain in biodiversity is encouraged".</p>
SD1 – criterion ii	<p>“assess and quantify the net increase in water and waste water to serve their developments”</p> <p>There is no evidence that the specific evidence requirements of this criterion are necessary for determining planning applications. Information on the scale and phasing of development is requested by Thames Water at the time a planning application is submitted. From this, Thames Water is able to establish whether there is a requirement for additional infrastructure. The supply of potable water/pressure levels is a matter for Thames Water. The supporting text to the policy (para. 2.1.3) acknowledges the role of Thames Water’s pre-planning service in advising applicants about any capacity issues, which is the mechanism by which additional infrastructure requirements are identified.</p> <p>Camden is a Lead Local Flood Authority, which means the Council has responsibility for managing flood risk from surface water and groundwater. Policy CC3 of the Camden Local Plan requires developers to utilise Sustainable Drainage Systems (SuDS) and conditions are attached to planning consents requiring submission of the system to be used. (link: <a href="https://www.camden.gov.uk/camden-local-plan1">https://www.camden.gov.uk/camden-local-plan1</a> )</p> <p>Requiring this additional information conflicts with paragraph 44 of the NPPF (Feb 2019) that states: “Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions...Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.”</p> <p>We consider this requirement should be removed as the matter is already addressed by liaison between applicants and Thames Water and Local Plan requirements for SuDS to be utilised (thereby helping to minimise flood risk).</p>	<p>This addition was requested by Thames Water in the October 2018 consultation but has now been removed.</p>
SD1 – criterion iii	<p>We suggest amending the period for assessing cumulative change from 2010 to changes that have occurred since 26th June 2006. This date has recently been referenced in the Council’s Interim Housing CPG, para IH5.9, which is when the Council first introduce policy to resist ‘de-conversions’. It would be simpler to apply an approach when both the Redfrog Plan and Camden’s own guidance use the same date. (link to Camden Planning Guidance: <a href="https://www.camden.gov.uk/web/guest/camden-planning-guidance">https://www.camden.gov.uk/web/guest/camden-planning-guidance</a> )</p> <p>We suggest replacing 2010 with 26th June 2006</p>	Amended accordingly

SD1 – criterion iv	<p>We broadly welcome the approach. However, the Local Plan (para. 3.78) only supports the loss of units where the existing dwellings are 20% or more below residential space standards and provided the loss of dwellings is no greater than needed to meet the standards.</p> <p>The rider 'no greater than needed' avoids the situation of 6 flats being amalgamated to form 1 house when only 2 are substandard.</p> <p>We suggest the following rewording: "Apartments that do not meet are 20% or more below the London Plan private internal space standards may be amalgamated to provide form fewer units provided the reduction in units is no greater than necessary to meet the standards."</p>	Amended accordingly
SD1 – criterion v	<p>We support the aim of increasing green cover in the Plan area and maintaining the Conservation Area's character. It appears unreasonable to expect all new development and building extensions outside of the conservation area to deliver "substantial urban greening measures" as individual site and building constraints may mean this is not possible. It is also not likely to be reasonable to expect applicants building extensions within the conservation area to deliver substantial greening in every instance.</p> <p>We consider this conflicts with paragraph 55 of the NPPF (Feb 2019): "Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects".</p> <p>We suggest adding the following text "contribute substantial urban greening measures where possible" "felling of existing trees and hedges...will not be permitted for the purpose of facilitating development": this would mean that any tree or hedge should be protected, therefore preventing development from taking place. We consider that this conflicts with para. 16 of the NPPF because it would unduly stifle the delivery of development. It also does not take into account the merits of the individual/group of trees or vegetation being considered; whether the trees have a Tree Preservation Order, their life expectancy or health, or proposals for replacement planting. Finally, it prevents the decision maker from considering other potential benefits of a proposal.</p> <p>The text needs to acknowledge that while the unnecessary loss of trees/hedges should be avoided, trees and vegetation will be protected according to their individual value/significance.</p>	<p>Significant urban greening is possible through small measures, eg native hedge planting along front, side and rear garden boundaries, creating wildflower areas, deadwood piles, replacing hardstanding with natural soft surface. Proximitree data show a <b>37% loss</b> in the number of trees between 2010 and 2016. This is clearly unsustainable.</p>
SD1 – criterion vi	<p>The Council has no powers to require applicants to plant certain trees along rear garden boundaries. The Council cannot refuse a scheme where an applicant chooses to use other trees.</p> <p>This criterion should be amended to 'encourage' rather than 'require' applicants to consider the list of trees.</p> <p>"Front garden boundary walls and hedges are to be preserved or reinstated for new developments and refurbishments of existing housing stock"</p>	<p>Rear garden tree corridors are key to enable species to move around. Can the Neighbourhood Plan "require" even if Camden does not?</p>
SD1 – criterion vii	<p>Permitted development rights apply, e.g. the demolition of front boundary walls, gates and railings below one metre in height is permitted development in conservation areas, except where these rights have been removed through an Article 4 Direction (as has occurred for a number of properties in Froggnal Way for example). Planning cannot prevent householders from removing a hedge.</p> <p>We suggest adding 'where appropriate' and including recognition of 'Permitted Development' rights in the 'Application' section, except where these have been removed by an Article 4 Direction. The NP may encourage the retention of hedges.</p>	<p>Agree suggestion to add "except where Permitted Development rights apply. An Article 4 Direction has been requested since 2010.</p>
2.1.3 – application	<p>Title: "Protection of Undesignated Heritage Assets"</p> <p>We consider it would be better to use the term 'non-designated heritage asset(s)' rather than "undesignated". The term NHDA is the one used by the National Planning Policy Framework and national Planning Practice Guidance so it would be consistent and avoid confusion.</p>	Changed accordingly.

	<p>This section of the Plan is focussed on the protection of NDHA, however the policy and supporting text also refers to designated heritage assets. We consider it would be clearer if this section either focussed purely on NDHA or considered heritage assets as a whole with separate sections/policies on NDHA and designated assets. Assuming that section 2.2 of the NP applies only to NDHA then the reference to para. 194-196 of the NPPF is not relevant as these refer to designated heritage assets.</p> <p>It would be helpful if this section provided definitions/explanation of NDHA (and designated assets if relevant) for clarification as the terminology is not currently used consistently across the Plan and supporting documents. The appendix refers to a designated heritage asset incorrectly as including local listing; the correct definition is included in the NPPF Glossary (link: <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a>.) A building on the Council's Local List would be an NDHA.</p> <p>The quotation of paragraphs 194-196 of the NPPF relate to designated assets and the four tests refer to substantial harm. The neighbourhood plan implies that these four tests can be applied for any level of harm (be it substantial harm or not). The cross-reference to para. 194 also misses the second part of this test leading to a potential misunderstanding of how it should be applied. Para. 194 of the NPPF advises that "any harm to, or loss of the significance of a designated heritage assets" should require clear and convincing justification and that substantial harm should be exceptional or wholly exceptional. It is important that the intention of the NPPF is set out in full rather than paraphrased.</p> <p>We suggest focussing this policy on NDHAs, providing a clear explanation of what they are. Text taken from the NPPF referring to designated assets should be removed or moved to a separate policy relating to these assets. References to statutory tests described in the NPPF should be set out in full and not paraphrased to avoid confusion about how they should be applied.</p>	<p>Changed to focus solely on non-designated heritage assets</p>
<p>Para. 2.2.1 – Intent</p>	<p>It seems rather unfair and intrusive to include a critique in the Plan of someone's private home. It would be better if the points could be illustrated with a more generic image. At the very least, it would be better if the address of the homeowner is removed.</p> <p>We suggest removing critique of permitted schemes in the Plan.</p>	<p>This has been removed to Evidence Base document (20) Sustainable Development and Redington Froggnal Character and only the street indicated.</p>
<p>SD2 criterion (ii)</p>	<p>This test taken from the NPPF refers to designated heritage assets. We do not consider that it can be applied to cover NDHAs.</p> <p>We consider this requirement should be removed from a policy relating to NDHA. It could be moved to a separate policy dealing with designated heritage assets.</p>	<p>Criterion ii has been developed with Historic England</p>

SD2 criterion (iii)	<p>the list of heritage assets, for which the Forum requests local listing” The list includes heritage assets, NDHAs and “Buildings for designation as Non-Designated Heritage Assets” – this list should refer only to buildings or structures which the Forum wish to see added to the local list.</p> <p>Many of the buildings on this list are already noted in the Conservation Area Appraisal as making a positive contribution to the conservation area. Local Listing does not give any added protection to buildings already in a conservation area. As a result, the Council does not include buildings that are positive contributors to a conservation area on the Local List.</p> <p>We also note that while the list refers to some positive contributors, it does not mention all of them. Omission of these buildings gives the impression that the Forum consider these to be of lesser importance. This might inadvertently weaken the Council’s position where proposals are being considered affecting such buildings.</p> <p>We strongly suggest that this list is reviewed to identify assets that the Forum considers should be added to the Council’s Local List. This should only refer to buildings and structures that have not already been identified as positive contributors by the Council in the Conservation Area Appraisal.</p> <p>“preserve and enhance the character” – Camden’s Local Plan only requires development to “preserve or enhance” and this is in line with the relevant statutory test. This issue was recently considered by the Examiner for the Dartmouth Park Plan in his report (para. 4.17): <a href="https://www.camden.gov.uk/dartmouth-park-neighbourhood-forum">https://www.camden.gov.uk/dartmouth-park-neighbourhood-forum</a></p> <p>We suggest amending the text “preserve and enhance” to ‘preserve or enhance’.</p>	<p>The list has been amended to cover all non-designated heritage assets only.</p> <p>"Preserve and enhance" has been changed to "preserve or enhance".</p>
Para. 2.3.1 – Intent	<p>Please do not refer to specific Council officers in this section; the job title will suffice</p>	<p>All names have now been redacted.</p>
SD.3 / SD 2.3.2	<p>The Council strongly supports car-free development; however, we also consider that the approach set out in Policy T2 of the Local Plan and Camden Planning Guidance (CPG): Transport (2019) appropriately balances the need to prevent the unnecessary creation of additional parking spaces and allowing existing homeowners to undertake works to their property without having to give up their existing parking provision.</p> <p>We do not consider the NP’s approach complies with the tests for imposing planning controls via a condition or planning obligation, as set out in paras. 55 and 56 of the NPPF (Feb 2019). For example, if a householder extended their home to provide a larger kitchen and dining area, with no increase even in household size, there would be no impact on private car ownership.</p> <p>Policy T2 of the Local Plan and CPG only seeks to make development car-free when there is a change of use or occupier. The NP goes notably further. Para. 10.20 of the Local Plan makes clear that we will apply the requirement in a fair and balanced way by ensuring rights of existing occupiers can be protected. The lack of flexibility in the Neighbourhood Plan is in direct conflict with Camden’s policy on this point.</p> <p>Camden’s approach was carefully calibrated with detail set out in the CPG on how any exceptions are intended to be applied; the extension of the car-free approach to the whole of the Borough is still relatively new and bedding in. We do not consider there is justification for having a separate car-free approach in one part of the Borough and no evidence has been presented to support this approach.</p> <p>Para. 31 of the NPPF (Feb 2019) states: “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.</p> <p>We suggest this policy is deleted.</p>	<p>The Neighbourhood Plan aims to provide clarity to Local Plan policy T2, which has proved open to interpretation (eg 5 Templewood Avenue and others).</p>
2.4.1	<p>Reference to “preserve and enhance”.</p> <p>This should be ‘preserve or enhance’ which is the wording used in the Camden Local Plan as well as legislation</p>	<p>Amended to "preserve or enhance".</p>
SD2.4 criterion (i)	<p>The impact of loss and light and shading to properties will need to be considered to establish whether it is acceptable; it would not be reasonable to resist a development where the loss of light or shading was minimal.</p> <p>Suggest rewording final sentence as follows:</p> <p>“Mid-rise development of up to six storeys will be considered for sites fronting Finchley Road, provided it does not cause unacceptable loss of light and shading to the properties and gardens behind”.</p>	<p>Changed to, "ii. Mid-rise development of up to six storeys will be considered for sites fronting Finchley Road, provided that there is no significant detriment through loss of light or increased shading to neighbouring properties and gardens."</p>

SD2.4 criterion (ii)	<p>This will not be achievable on every site and should allow greater flexibility. Suggest rewording to recognise the variety of built form: “Where possible, development should reinforce the Plan area’s verdant character of streets and spaces through additional planting and use of setbacks or enclosures to establish front and rear gardens”</p> <p>The specification of gaps for the whole Plan area seems overly prescriptive and doesn’t allow what might be appropriate for individual streets, including narrower plots. To ensure the policy can work adequately across a range of different circumstances, we suggest expressing these gaps as an indicative minimum rather than a requirement that must be applied in every case.</p>	x
SD2.4 criterion (vi)	<p>Suggest rewording as follows: “The spacing of houses must allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. <b>The Forum</b> This includes providing a <b>considers</b> a minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this <b>must should</b> be reflected in the spacing of new development”.</p>	<p>Changed to "vii The spacing of houses must allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. A minimum gap of 4 metres will be appropriate between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this will be appropriate in the spacing of new development."</p>
SD2.4 criterion (vii)	<p>Typo – word “use” in final sentence.</p>	Corrected
2.4.3 – Application	<p>“Biodiversity net gains are to be set out and quantified using the GLA Urban Greening Factor for London” – as for Policy SD1 above, it needs to be clarified that the Mayor’s emerging UGF approach applies only to major schemes and the targets for “predominantly residential” and “predominantly commercial schemes” are set out in the London Plan. The NP should indicate that Urban Greening Factors are an emerging approach in the new London Plan. Also, that they are intended to be applied to major developments and the London Plan sets interim targets for predominantly residential and predominantly commercial schemes. “A very high urban greening score is likely to be appropriate” – this entirely depends on the size and nature of the site and the range of greening options available”. Without further evidence of what UGF scores might be achievable in the Redfrog area, we consider the statement urging a very high urban greening score should be modified: “Applicants should seek to achieve high urban greening scores in the Redfrog area recognising the wide range of urban greening opportunities likely to be achievable on many sites” “Full landscaping details should be submitted with planning applications, including landscaping of front and back garden space”: as with para. 2.1.3 above, the Council only requires landscaping schemes to be submitted for major developments. We do not consider this should be extended to any planning application impacting on a front or rear garden for the reasons set out earlier in this response. The text should clarify that the Council requires landscaping schemes for major developments. We do not consider that it is helpful for a neighbourhood plan to contain critiques of schemes that the Council has previously permitted. Making an assumption that such developments would be refused if the NP was in place, pre-empts the role of the decision maker in taking all material considerations into account.</p>	<p>Changed to "Applicants should seek to achieve high urban greening scores in the Redfrog area recognising the wide range of urban greening opportunities likely to be achievable on many sites” Applicants should set out plans for biodiversity net gain and demonstrate how this is to be achieved, referencing the GLA Urban Greening Factor for London. The local planning authority should consider conditioning planning applications to prevent erosion of character from the replacement of front gardens with hard-surfaced parking space and the hard surfacing of rear gardens."</p>
SD5	<p>The reference to outbuildings and swimming pools in a policy entitled “Extensions” creates a degree of confusion about how it is intended to be applied. The current title and first para. suggest that the policy may only cover extensions to outbuildings and swimming pools. The title and policy text needs to clear what requirements apply to new outbuildings and swimming pools. By its nature, an outbuilding would not normally be considered to be an extension to a building and swimming pools will often not be joined directly to someone’s home.</p>	<p>The title of policy SD 5 has been changed to "Dwellings: Extensions and Garden Development"</p>

SD5 criterion (i)	<p>What is the non-designated heritage asset being referred to here? This would only be relevant if there was an NDHA in proximity to the proposed scheme. The same point applies to the Plan area's green space – only developments in certain locations are likely to have an impact. It would not be reasonable to expect such evidence to be provided if these assets were unlikely to be affected.</p> <p>We suggest rewording as follows: "Where appropriate, extensions should be designed to conserve or enhance the setting of a non-designated heritage asset or green spaces designated by the Local Plan or neighbourhood plan".</p>	The policy has been reworded
SD5 criterion (v)	<p>As with SD4 above, we consider there should be some flexibility to ensure the policy can work adequately across a range of different circumstances. We suggest expressing the gaps as an indicative minima.</p> <p>We suggest rewording as follows: "The spacing of houses must allow for maintenance and retain the verdant, biodiverse character of the area by allowing views through the built frontages. <b>The Forum</b> This includes providing a <b>considers</b> a minimum gap of 4 metres <b>will be appropriate</b> between the ends of terraces and a minimum gap of 2 metres between semi-detached or detached houses. Where the established character includes wider gaps, then this <b>must should</b> be reflected in the spacing of new development".</p>	This now incorporates the same wording as SD 4.
2.5.3 – application	The Council has no control over the removal of hedges. Their retention should be encouraged.	"should be retained" added to the end of criterion vii.
2.6.1. – second para SD6	<p>Typo – "sense place"</p> <p>Typo – "to support the policy" – this is the policy and the text is not required. Suggest delete text as follows:  <i>Development is encouraged to support the policy to minimise the impact on key views A to S, identified in Appendix SD</i>  <i>Key Views, and to retain the rhythm of mature trees and hedges and picturesque roof lines.</i></p>	Corrected
	<p>We welcome that commentary now accompanies each of the views in the supporting document to explain what the main elements of the view are. It would be helpful if the introduction to this document briefly described how it is intended to be used – i.e. as guidance to support decision making.</p> <p>We remain concerned that key view K shows a hard surfaced gap between buildings; rather than a view and suggest this s deleted. We also suggest that the views are listed alphabetically as per the policy since having both numbers and letters for each view will potentially cause confusion.</p>	The policy on key views has been deleted, ad it was unlikely to be effective.
<b>Historic England response</b>		
General	<p>As we previously stated we are pleased to note the strong emphasis on local historic and architectural character within the draft plan, and the identification of policies to protect and enhance the historic environment</p> <p>The demolition policies would still benefit from clarification and minor revision to ensure that these are in conformity with the NPPF and do not impose levels of protection on undesignated heritage assets analogous to national policy for designated heritage assets.</p>	<p>Historic England uses the phrase "protect and enhance"</p> <p>The NPPF wording has now been copied in full.</p>

<p>SD 2 2.2.1</p>	<p>The revised draft states at SD 2 2.2.1</p> <p>The NPPF also notes in paragraphs 194-196 that planning applications causing “any harm to, or loss of the significance of a designated heritage asset”, or substantial harm, should be refused, unless all of the following tests are met:</p> <p>The wording of NPPF Para 195 states:</p> <p>Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <p>We would recommend including this in its entirety as the tests are applied in the event that the substantial public benefit cannot be demonstrated to outweigh the harm or loss. This makes clear that the requirement for the application of the tests is in the event of failure to demonstrate public benefits which outweigh significance. The significance of an undesignated heritage asset will be less than that of a designated heritage asset. In the event of demolition of an undesignated asset in conservation area it is the impact of loss on the designated asset (the conservation area) that must be assessed (this may be considered substantial harm in cases where the undesignated asset is of sufficient importance to the wider significance of the conservation area)</p> <p>We are pleased to note the removal of the previously proposed “medium” marketing requirement at 2.2.2 iv which we would consider problematic.</p>	<p>The NPPF wording has now been copied in full.</p>
<p>2.2.2 iv</p>	<p>SD6 Key View Designation. We would reiterate that it is not clear why certain views have been identified. We would therefore recommend this section is supported by a clear methodology for defining the views corridors . We would suggest the possibility of addressing a number of the proposed views through broader development policies, such as avoiding in-filling between plots or where the character of the street is defined by the rhythm of mature trees, secluded paths, or where the character is defined by picturesque roof lines. You may wish to consider whether views are focused on landmarks, panoramic and whether these are kinetic.</p>	<p>No action needed.</p>
<p>SD 6</p>	<p>SD6 Key View Designation. We would reiterate that it is not clear why certain views have been identified. We would therefore recommend this section is supported by a clear methodology for defining the views corridors . We would suggest the possibility of addressing a number of the proposed views through broader development policies, such as avoiding in-filling between plots or where the character of the street is defined by the rhythm of mature trees, secluded paths, or where the character is defined by picturesque roof lines. You may wish to consider whether views are focused on landmarks, panoramic and whether these are kinetic.</p>	
<p><b>GLA response</b></p> <p>General</p>	<p>The Neighbourhood Forum set out their primary objectives from the outset, and this is welcome, underpinning the overall approach to the neighbourhood plan and builds on key components of the Mayor’s Good Growth policies GG1 building strong and inclusive communities and GG3 creating a healthy city.</p> <p>Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While the officers consider that the Neighbourhood Plan would positively contribute towards environmental sustainability, it should help contribute more positively towards the implementation of Camden’s Local Plan in meeting housing needs and the delivery of affordable housing.</p> <p>The Neighbourhood Plan, at the very start, should include a map/maps, illustrating the entire extent of the Neighbourhood Plan and how it relates contextually to the wider area beyond its boundaries. It would also be useful if a map was included showing the distribution of proposed site aspirations.</p>	<p>Camden has its own very clear policies on affordable housing.</p> <p>Maps have now been added.</p>

<p>Housing targets</p>	<p>Since the previous consultation on the Redington Froggnal Neighbourhood Plan, in January 2019, new updated national guidance on neighbourhood planning has been published and should be taken into account. The guidance reinforces some elements of our earlier response to the Redington Froggnal Neighbourhood Plan especially with regard to setting a housing target for the area. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authorities local housing need as a starting point. If Camden Council are unable to provide a housing requirement figure or set out an indicative figure the Redington Froggnal Neighbourhood Forum should instead use the neighbourhood planning toolkit on housing needs assessment for this purpose. Neighbourhood Plans are encouraged to meet or exceed housing requirements. A housing requirement figure would demonstrate a positive and proactive approach to neighbourhood planning and would be welcomed and supported by officers.</p> <p>Presumption in favour of small housing development The Draft New London Plan's presumption in favour of small housing development applies to small sites that fall within 800m of town centres and stations and in areas with a PTAL of between 3 and 6. For the neighbourhood plan this will include the Hampstead, West Hampstead and Swiss Cottage/Finchley Road town centres and Hampstead Underground Station and Finchley Road and Frognal Train Station. The neighbourhood plan should recognise that the presumption in favour of small housing development as set out in Draft New London Plan Policy H2 relates to different types of development including infill development, residential conversions and extensions, demolition and/or redevelopment of existing houses and/or ancillary buildings, infill development within the curtilage of a house and the redevelopment or upward extension of flats, non-residential buildings and residential garages to provide additional housing and should avoid policies that would prevent small sites development from coming forward</p> <p>The neighbourhood plan presents an opportunity for the forum to develop suitable and appropriate residential design codes for small housing development types in appropriate locations within the neighbourhood area in accordance with Draft New London Plan Policy H2. Officers would also support the forum's intention to explore suitable small housing development in the area in order to contribute towards the delivery of Camden's small housing sites target of 376 new homes a year as set out in Table 4.2 of the Draft New London Plan.</p>	<p>The table providing estimates of units deliverable from the Possible Redevelopment Opportunities has been removed.</p> <p>The Conservation Area has recently accommodated some major developments, totalling over 300 flats. There are now no remaining available sites and the Forum have struggled even to identify the nine Possible Redevelopment Opportunities. It is important that the Plan Area also includes workspace and provision for community and cultural facilities. The Possible Redevelopment Opportunities provide a degree of flexibility in how the sites are utilised</p> <p>Accompanying document 8.2 Guidance Notes for Developers provides design guidance, including for Possible Redevelopment Opportunities.</p>
<p><b>TfL response</b></p>	<p><b>SD 2.3.2</b></p> <p>Car free TfL is supportive of Policy SD 2.3.2 committing to car-free development in the Neighbourhood Plan area. However we seek clarification that the support for Electric Vehicle Charging Points (EVCs) will not encourage or allow any new additional car parking spaces.</p> <p><b>General</b></p> <p>Healthy Streets &amp; Mayor's Transport Strategy We request that the Neighbourhood Plan sets out an explicit aspiration for traffic reduction like the Mayor's Transport Strategy (see Proposal 22). We also encourage you to include the Healthy Streets 'wheel diagram' (see Appendix A) in the Neighbourhood Plan to fully embed the Healthy Streets Approach into planning decisions in the area. A previous draft document contained references to the Healthy Streets approach, which now seem to have been removed.</p>	<p>"Allocated spaces for shared electric vehicles are encouraged, along with on-street electric vehicle charging points, as long as these do not result in new, additional car parking" has been added into the Application section of policy SD 3</p> <p>"TfL Healthy Streets for London" is included as Evidence Base document (120), but the policy on Finchley Road - A Healthy Street has been deleted as it falls outside the remit of the Neighbourhood Plan.</p>

	5.8.19 Camden comments	Forum response
<b>BGI</b>	<b>Biodiversity and Green Infrastructure</b>	
BGI 1 criterion v	<p>There may be circumstances where the size of the site and/or uses on adjacent land prevent a tree being replanted. Suggest rewording text as follows:</p> <p>"where tree removal is unavoidable, such as the removal of dead, dying, unsafe trees or invasive species, they must be replaced within the site by a similar or other native species <b>unless it can be demonstrated to the Council's satisfaction this is not possible</b>".</p>	Changed accordingly
3.2.3 – Application	<p>The Council supports the principles of the policy to maximise soft landscaping and minimise soft landscaped areas. As stated above for paras. 2.1.3 and 2.4.3, we do not consider there should be a policy requirement for all schemes to provide landscaping plans. For the same reasons as set out earlier in this response, we do not consider this additional evidence requirement is reasonable. Suggest rewording as follows:</p> <p><i>"Development applications are to map and quantify <b>The design process should consider the quantum of the existing and proposed areas of soft natural surface. Decking, patios, lightwells and artificial grass are deemed to be hard surface. Wherever possible, additional areas of soft surface and greening measures are encouraged to offset the loss of soft garden space</b>".</i></p>	Changed accordingly
3.3.1 – Intent	<p>There should be acknowledgement that the ability to deliver all of the policy's aspirations will be dependent on the scope of permitted development rights. Suggest in the final sentence on page 26:</p> <p><i>"BGI 2 seeks to re-green streets, to preserve traditional front boundary treatments and to enhance the street scenes, <b>subject to permitted development rights that may apply to certain proposals</b>".</i></p>	This has been included.
BGI 3 criterion iv. c	<p>The Council is unable to require applicants to provide plans for replacement planting where notifications to fell are issued because the information that forms part of any notification is set by legislation at a national level. We suggest that this requirement is removed as the Council would not be able to enforce it.</p>	The requiremet for replanting has been retained.
Application, para. 3.4.3	<p>It would be helpful if the evidence requirements requesting maps instead referred to the tree surveys/arboricultural assessments already sought by Camden through its Local Area Requirements (i.e. the validation list). This will avoid confusion for applicants regarding what is required to support a planning application and reduce potential duplication of material.</p>	<p>Hampstead Conservation Area Advisory Committee finds that the locations of trees are frequently not indicated. The words "include justification, by an Arboricultural Association approved consultant, of ...." have been added to coordinate with Evidence Base document (126) Camden Local Area Requirements.</p>
Para. 3.6.1 - Intent	<p>As stated above, please share the Guidance Notes to Developers with the Council so we can comment on the species proposed in the tree list.</p> <p>ANGSt standard – This standard considers the level of accessible greenspace as a national (England) average. It has limited applicability to urban environments where it is extremely difficult to provide new areas of open space. It would be more relevant to compare accessibility to open space across different wards in Camden or with the Camden or London average. Data for Camden is set out in the Council's Open Space Study: <a href="https://www.camden.gov.uk/evidence-and-supporting-documents">https://www.camden.gov.uk/evidence-and-supporting-documents</a></p>	<p>The Forum seeks tree planting to support wildlife. This is in accordance with the London Plan.</p> <p>Reference to Evidence Base document (127) Camden Open Space Study, 2013, has been added</p>
BGI 5 – evidence compliance with NPPF Para. 100 Tests	<p>The justification under the heading "Is it local in character and is it an extensive tract of land?" is not addressed in some of the comments for individual sites, e.g. LGS5 says "The musical comedy actress and picture postcard beauty, Marie Studholme, lived and died at Croft Way"</p>	The justifications have been revised.
Local Green Spaces	<p>The comments in the far right column of this table need to be reviewed to ensure they relate to the header. This will avoid possible challenge to the designations.</p> <p>Not all of the proposed local green spaces are accompanied by a map. To avoid any doubt about the extent of the boundaries, the submission draft plan must map the boundaries for each proposed LGS. This will ensure that the designations can be applied effectively in decision making. With no map, the LGS may be removed by the Examiner.</p>	Thank you very much for this advice
		Maps have now been prepared and added.

<p>LGS 8: Kidderpore Gardens</p>	<p>"The natural pond, planned for the north-western corner of the SINC...is expressly included within this designation, on account of its high value to biodiversity."</p> <p>It is only possible to propose a LGS that already provides value to the local community and meets the tests set out in paragraph 100. The SINC designation pre-dates the implementation of the Mount Anvil scheme; therefore, the boundary The SINC designation pre-dates the implementation of the Mount Anvil scheme; therefore, the boundary today differs to what is designated on the Council's Policies Map (which itself is based on a London Wildlife Trust survey undertaken in 2013/14). The precise boundary of the LGS needs to be assessed to reflect that some of the SINC has been lost and new wildlife areas created. This should be based on what has actually been implemented and therefore has an existing community value, and not any land that has still to be provided. It would be possible for the LGS to be extended through a future review of the neighbourhood plan.</p> <p>The LGS should be named "Kidderpore Gardens", removing the SINC designation from the title. This is because the boundary on the Council's current Policies Map does not yet take into account the implementation of the Mount Anvil scheme. This boundary will be reviewed by London Wildlife Trust in the future and it would be confusing if the neighbourhood plan and Policies Map showed different areas for the same SINC. The biodiversity value can still be described in the supporting text.</p>	<p>The pond has now been instated. Text to be changed to past tense.</p> <p>The site is now open to the public and has been re-named "Hampstead Manor Gardens".</p>
<p><b>GLA response</b></p> <p>General</p>	<p>Officers welcome the overall approach to the preservation and enhancement of green spaces and biodiversity in the draft Redington and Frogna Draft Neighbourhood Plan.</p>	
<p><b>Thames Water response</b></p>		

LGS 1: West Heath Lawn Tennis Club	<p><b>Objection:</b> West Heath Lawn Tennis Club is located on land owned by Thames Water with a lease granted which runs until 2022. The site is located adjacent to Kidderpore Reservoir and is a secure site with only members of the tennis club and Thames Water as the land owner having rights of access. It is understood that the tennis club currently has membership of around 140 with non-members only able to play at the club accompanied by members and then only on a limited number of occasions each year. The lease agreement with Thames Water requires the tennis club to not allow any persons other than the lessee's members, servants, agents, workmen and invitees to enter upon the said land for any purpose whatsoever. The site is not a green area that is demonstrably special to the local community and as such a Local Green Space designation is not considered appropriate. This is set out with respect to the designation criteria identified in the NPPF, as follows.</p> <p><b>Recreational Value.</b></p> <p>While the site is leased to a tennis club it is a private members club with limited membership which does not provide facilities for the wider community. As set out above public access to the site is restricted with the site gated and secured. Consequently, in terms of the sites recreational value, the site is not considered to have sufficient value to warrant a Local Green Space designation.</p>	The site is on Camden's Local List and Schedule of Open Spaces: <a href="https://www3.camden.gov.uk/planning/plan/udp/Appendix%205.pdf">https://www3.camden.gov.uk/planning/plan/udp/Appendix%205.pdf</a>
LGS 2: Tennis Courts to the Rear of Windsor Court, Platt's Lane	<p><b>Historic Significance.</b></p> <p>The land contains three grass tennis courts and two hard courts together with a small pavilion building and lies adjacent to the Kidderpore Reservoir which was reconstructed through the provision of a replacement roof structure in 2013. The site lies within the Redington/Frogna Conservation Area, the Conservation Area Statement states that the Tennis Club is identified in the UDP as a Private Open Space situated either side of a covered reservoir. Thames Water does not consider that the heritage value of the site is sufficient to warrant a Local Green Space designation particularly as the site is also designated as part of a Conservation Area and is also designated as Private Open Space in the Camden Local Plan.</p> <p><b>Beauty and Tranquillity.</b></p> <p>Given the location of the tennis club adjacent to an existing service reservoir and that half of the site is covered by hard tennis courts, it is not considered that the site is sufficiently beautiful or tranquil to warrant designation as a Local Green Space.</p> <p><b>Wildlife</b></p> <p>Objection: LGS 2: Tennis Courts to the Rear of Windsor Court, Platt's Lane as Local Green Space we object to the proposed designation which shows the site to cover both Kidderpore Reservoir which is an operational asset and the West Heath Lawn Tennis Club subject to proposed designated as Local Green Space under LGS 1.</p> <p>It is considered that the plan within the policy is incorrect and the proposed allocation is likely to relate to the tennis courts to the northwest of the reservoir. If so then this is on land that is no longer owned by Thames Water.</p> <p>If the allocation is proposed to relate to the land as shown in the plan in the policy then the name of the proposed allocation is considered to be misleading and Thames Water object to the allocation on the same grounds as set out above. In addition, the inclusion of the operational reservoir would include land which has no recreational value and no historic or wildlife significance and as such would not meet the requirements for designation as Local Green Space.</p>	The plan has been redrawn. LGS 2 has been deleted from the list of proposed Local Green Spaces.

	Camden comments, 5.8.19	Forum response
<p><b>CF</b></p> <p>4.1.2 – Community facilities</p> <p>4.1.3 – Application</p> <p>CF 2</p>	<p><b>Community Facilities</b></p> <p>The policy does not consider circumstances where it is no longer viable to continue providing a community facility. We do not support reference to “the Plan area’s population” because a more relevant consideration for community facilities is the catchment of their users. This varies depending on the nature and type of community facility, e.g. a college will normally have a much wider catchment than a post office. It will also be difficult for applicants and the Council to reliably gauge the impact on users specifically in the Plan area, potentially requiring additional evidence to be gathered, on top of information that may be requested at a catchment level.</p> <p>It may also not be reasonable to expect a facility to be reprovided within walking distance from the centre of the Plan area. Some community facilities can be provided outside of the Plan area and still be accessible for their users; the co- location of facilities can also be an important means of improving service provision and allowing existing services to continue running successfully (for example where existing premises are outdated or expensive to maintain).</p> <p>The policy approach conflicts with Camden Local Plan Policy C2 which provides more flexibility in terms of how community facilities and services are delivered. We suggest rewording as follows:  “i. there is no loss in the community value of the site to the Plan area’s population; or  ii. evidence has been presented to the Council’s satisfaction to demonstrate that a community use is no longer viable; or  iii. an alternative and comparable facility is provided in a suitable location for its existing users, nearby location within walkable distance from the centre of the Plan area.</p> <p>We do not support the reference to walkable distances to community facilities. This will vary according to the nature of the community use. While a children’s playspace for example should be provided within an easy walking distance, more flexibility should be provided for larger uses such as health centres or schools. We suggest deleting this text or stating ‘where appropriate’ based on the type and nature of the community use.</p> <p>Community infrastructure priorities  Officers welcome the neighbourhood plans recognition that 25% of CIL receipts collected from development within the neighbourhood area will be given to the forum for the purposes of delivering the neighbourhood plan. The neighbourhood plan sets out in the broadest of terms its infrastructure priorities. However, it is considered that these priorities could be more detailed and area specific and should be agreed in collaboration with Camden Council and infrastructure providers such as TfL where necessary. The plan refers to Evidence Base document CF3 Community Infrastructure Priorities, but the infrastructure priorities should either be included in an appendix as part of the draft Neighbourhood Plan or made more clear and easily accessible on the website.</p>	<p>A large proportion of the Forum population are elderly and much of RedFrog does not enjoy good public transport links. Walkability is important for health and well being and will become of even greater importance as Camden’s car-free development policy takes effect. The wording has been changed to “III. an alternative and comparable facility is provided in a suitable, nearby location within the neighbourhood”.</p> <p>Under Application “nearby” is defined as “within maximum walkable distance” of 1.2 km from the centre of the Plan Area.</p> <p>Forum members are surveyed to gauge expenditure priorities and projects have already been agreed with Camden and are underway. Future projects will evolve during the Plan period. The table of CIL priorities is provided in Evidence Base document (117) CF 2 Community Infrastructure Priorities. Greater prominence is being given to CIL priorities on the Forum website. The Forum wishes to work with TfL to enhance the environment of Finchley Road.</p>

	<b>DS Aspirational Development Sites (now re-titled Potential Redevelopment Opportunities)</b>	
	<b>5.8.19 Camden comments</b>	<b>Forum response</b>
General	we are concerned that some of the wording in the aspirational sites section goes beyond what would be understood to be aspirational, becoming instead firmer requirements that development 'must meet', ie. how a 'site allocation' is expressed. If the aspirational sites/site briefs are to be treated as site allocations, we consider that in line with the National Planning Practice Guidance a Strategic Environmental Assessment would need to be undertaken.	The DS section is no longer a Policy and it has been emphasised that that the Neighbourhood Plan does not make any site allocations. It is included only as guidance and it has been retitled as "Potential Redevelopment Opportunities".
General	The Council can only use planning conditions/obligations in line with the National Planning Policy Framework: specifically mitigation must have regard to the type and size/scale of development being proposed, for example we cannot seek 'substantial' greening measures for any development.	Natural Environment Planning Practice Guidance (21.7.19) p12 "Plans.....can be used to set out a suitable approach to both biodiversity and wider environmental gain, how it will be achieved....." "...local biodiversity opportunity or ecological network maps.....strategic flood risk assessments....." . "Consideration may also be given to local sites where communities could benefit from improved access to nature." P.13 "It will also be important to consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change....."
General	Please could you confirm whether they were invited to comment on the latest Regulation 14 document.	No changes have been made since the first consultation and further letters were sent only to statutory consultees. Thames Water has now objected to LGS designation for WHLTC and Windsor Court tennis courts. Windsor Court has been removed as proposed LGS, but WHLTC is retained. LGS owners were re-contacted, resulting in objections / queries from Telegraph Hill and one director of Froggnal Lane Gardens.
General	the Plan contains reference to individual Council officers, critique of people's homes (including identification of the address) and unsubstantiated comments about the quality of Campbell Reith's work (the Council's basements advisor). The Council will request the Examiner to remove these elements from the Plan because we do not consider this content to be relevant to the determination of planning applications. Campbell Reith has also indicated that they may seek further action if the comments about their work remains in the Plan. This could result in the successful adoption of the Plan being delayed.	All names have now been redacted and their reference to Campbell Reith deleted.
5.1 – Intent	As previously advised in response to the first Regulation 14 consultation, aspirations can only be treated as indicative guidance. They cannot be used as a basis for refusing particular schemes. While it is understood that the role of the Forum is distinct from the Council the paragraph beginning "If the sites, described briefly below..." potentially causes confusion about how the sites should be treated through the planning process and raises an expectation that they should be refused if all the aspirations are not met.  This issue was recently considered by the Examiner of the Dartmouth Park Neighbourhood Plan. He contended that the Forum's "specific neighbourhood sites" needed to be made clearer, that they do not form part of the development plan. The Examiner has proposed modifying the Plan to state: "These aspirations do not form part of the development plan  The Neighbourhood Plan should also be positively worded setting out what applicants should do in order for development to be approved; rather than resisting/refusing development being the starting point. This approach is promoted by the NPPF. A further minor point is that the text needs to be clear what the "Redington Froggnal design policy" refers to.  We suggest rewording as follows: If the sites, described briefly below, were to become available, the Forum would support resist development unless where it accords with the Redington Froggnal design policy (please name) and BGI policies and aspirations for the sites as set out below.	This has been noted and the DS section is no longer a Policy and it has been emphasised that that the Neighbourhood Plan does not make any site allocations. It is included only as guidance. The Design policy has been clarified as Policy SD 4 Sustainable Design and Redington Froggnal Character.  The wording has been amended to "If the sites, described briefly below, were

<p>5.2.1 – Intent</p>	<p>As with the comment above, aspirations set out what might be desirable. They cannot be used as a basis for determining individual development proposals. The word “must” imposes an absolute requirement that developers would be expected to meet. Inclusion of this “must” would also in the Council’s opinion trigger the need for the Plan to be subject to an SEA/Strategic Environmental Assessment. We strongly advise that this is removed. We suggest rewording as follows: “</p> <p>“Development, redevelopment or improvement of the following sites is encouraged. This <b>must should</b> take account of the development principles <b>aspirations</b> set out below”.</p>	<p>The wording has been amended to, “the sites, described briefly below, were to become available, the following options could be considered.”</p> <p>This has been changed to, “Development, redevelopment or improvement of the following locations is encouraged. They are not intended as site allocations, but guidance, in the event that any of the sites RF 1 to RF 9 come forward for development. Development should take account of the development principles set out below”.</p>
<p>5.2.2 – Aspirational development sites</p>	<p>The policy cannot include specific “requirements to be achieved” – this goes beyond an aspiration – rather it becomes a series of site allocations and we consider this is likely to trigger the need for the Plan to be accompanied by an SEA.</p> <p>Para.046 Ref ID:11-046-20150209 of the National Planning Practice Guidance sets out 3 situations where neighbourhood plans may require an SEA: one of these is where the plan allocates sites for development. (link: <a href="https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal">https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal</a> )</p> <p>It is also inconsistent and potentially misleading to have a policy entitled as being aspirational and use the site briefs as a basis for refusing or approving individual development schemes. The phrase “requirements to be achieved” should be modified.</p> <p>We suggest deleting the text: : “For each of the sites below, other factors to be considered, in addition to the BD and BGI policies, are set out in short site briefs in the separate document...” The Site Briefs cannot be “other factors to be considered” because they are not policy.</p> <p>We also suggest rewording as follows:</p> <p>“Specific requirements to be achieved, in addition Developers should take into account to the SD and BGI policies of the <b>Neighbourhood Plan, and refer to the guidance set out in accompanying site briefs – shown in Appendix X to the Plan/Design Briefs for Aspirational Development Sites document (or Guidance Notes to Developers). This guidance does not form part of the development plan</b> . are set out in further detail in the separate document entitled Aspirational Development Site Briefs”.</p> <p>In line with the Dartmouth Park NP Examiner’s report, we consider that the Regulation 14 Plan and Appendix X/Design Briefs for Aspirational Development Sites document/Guidance Notes for Developers should make clear that the aspirations do not form part of the development plan. We have provided comments on the supplementary document at the end of this table – this includes identifying where the guidance itself reads as policy requirements.</p>	<p>This text has been deleted.</p> <p>The title has been changed to DS Possible Redevelopment Opportunities and the text amended to, “Guidance (not policy) is provided for each of the following potential of redevelopment opportunities, with site references”.</p> <p>For site reference RF 8, the wording has been changed to “RF 8 282-284 Finchley Road: a mid-rise mansion block of up to five storeys, taking account of policies SD and BGI</p> <p>This has been clarified.</p>
<p>GLA response</p>	<p>Housing and aspirational site identification</p> <p>The overarching objective of the current and Draft New London Plan and Camden’s Local Plan is to deliver more homes that Londoner’s need whilst protecting green space/MoL/GB and industrial land. Site allocations and neighbourhood plans that would prevent this from happening should be avoided at all costs. Camden’s housing target as set out in Table 4.1 of the Draft New London Plan is for 1,086 new homes a year and the neighbourhood plan should set out how it will contribute towards achieving this. The Redington and Froggnal Neighbourhood Plan should adopt a more proactive and positive approach towards development in the area in accordance with the Mayor’s Good Growth policies GG2 and GG4 and Policy D6 of the Draft New London Plan which sets out guidance for optimising development should also be followed.</p> <p>A neighbourhood plan such as this, which plans for the meagre delivery of only 35-39 new dwellings up to 2050, as set out in Table DS1 can only be considered to be negative and will not positively contribute towards Camden’s or London’s housing needs in the longer term. Officers encourage and support development positive site allocations that could realise potential uplifts in associated land values and provide certainty and clarity that are more likely to incentivise appropriate, sustainable and suitable development in the area and the associated benefits that this can bring.</p>	<p>The Conservation Area has recently accommodated some major developments, totalling ober 300 flats. There are now no remianing available sites and the Forum have struggled even to identify the nine Possible Redevelopment Opportunities. It is important that the Plan Area also includes workspace and provision for community and cultural facilities. The Possible Redevelopment Opportunities provide a degree of flexibility in how the sites atre utilised. Table DS 1 has been removed.</p>
<p>Table DS 1</p>		

	<p>The neighbourhood plan presents an opportunity for the forum to develop suitable and appropriate residential design codes for small housing development types in appropriate locations within the neighbourhood area in accordance with Draft New London Plan Policy H2. Officers would also support the forum's intention to explore suitable small housing development in the area in order to contribute towards the delivery of Camden's small housing sites target of 376 new homes a year as set out in Table 4.2 of the Draft New London Plan.</p>	<p>The Design Codes developed for the Forum were considered harmful to the Conservation Area and have been downgraded to accompanying document 8.2 Guidance Notes for Developers.</p>
<p><b>Thames Water comments</b></p> <p>General</p>	<p>In light of the changes which took effect in April 2018, and which are set out above, and as the sites are currently not allocated in the Local Plan, we would request that a paragraph is included in the Neighbourhood Plan which states:  <b>"Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</b>  <b>Thames Water encourages developers to use our free pre-planning service <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>).</b>  This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't.</p> <p>The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes."</p>	<p>The Application of Policies SD 1 and SD 4 includes the text, "Developers are encouraged to use Thames Water's free pre-planning service: <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>  This service can tell developers at an early stage if Thames Water will have capacity in its water and / or waste water networks to serve their development, or what Thames Water will do, if it does not. The developer can submit this as evidence to support a planning application and Thames Water can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes."</p>

	Camden comments, 5.8.19	Forum response
<p><b>FR</b></p> <p><b>Finchley Road Shopfronts</b></p> <p>6.2 Finchley Road: Shopfronts criterion ii</p> <p>6.2 criterion iii.</p> <p>6.2 criterion iv</p> <p>6.2 criterion vi</p> <p>6.3 application</p>	<p>It is not reasonable nor a contextually-based approach to expect shopfronts on all 20th and 21st century buildings to incorporate all of these elements, especially corbels and pilasters. The Council's Design CPG expects new shopfronts and alterations to existing shopfronts to be sensitively designed and in keeping with the character of the host building or surrounding area. Achieving this is likely to depend on factors such as:</p> <ul style="list-style-type: none"> <li>• Designing the shopfront as part of the whole building, ensuring it relates well to the scale, proportions and architectural style of the building and surrounding facades;</li> <li>• Vertical or horizontal elements that respond to the rhythm or symmetry of upper floors or adjacent buildings;</li> <li>• Careful attention to the type and quality of materials used, to their detailing and the execution of any finishes.</li> <li>• Avoiding large areas of unarticulated glazing.</li> </ul> <p>We suggest removing overly prescriptive requirements from the NP.</p> <p>This goes beyond what planning is able to control. We cannot be this prescriptive in terms of materials that are used</p> <p>We suggest rewording as follows: "Shopfronts <b>must should</b> use a pallet of materials similar to <b>which complement</b> the original Victorian frontages, including...."</p> <p>This is extremely prescriptive and goes beyond what planning is able to control. We suggest deleting this criterion.</p> <p>It is not reasonable to expect schemes to follow this requirement in all cases. The approach also does not distinguish between traditional and more modern shopfronts. We suggest rewording as follows: <b>Examples of original s</b>Shopfronts <b>must should</b> be retained where shops change to alternative uses, such as offices.</p> <p>The references to additional planting and greenspaces are not included in this policy. It would be helpful if there was cross-reference to policies in the NP that deal with setbacks for planting, tree planting and greening measures.</p>	<p>This is a Victorian parade, which may even be listed</p> <p>The policy relates to traditional Victorian and Edwardian shopfront only. NW Leicestershire provides similarly detailed conservation advice: <a href="https://www.nwleics.gov.uk/files/documents/shop_fronts_and_advertisements_spd/Shop%20fronts%20and%20advertisements%20SPD.pdf">https://www.nwleics.gov.uk/files/documents/shop_fronts_and_advertisements_spd/Shop%20fronts%20and%20advertisements%20SPD.pdf</a></p> <p>The policy is now limited only to shopfronts, as other elements fall under the jurisdiction of TfL and it was advised that this be removed. Accompanying document 8.2 Guidance Notes for Developers notes that Policy SD 4 applies in respect of the relationship to the street.</p>

<p><b>TfL response</b></p> <p>General</p> <p>6.1</p>	<p>TfL previously responded to the draft Neighbourhood Plan on 23 January 2019. Our previous comments are still applicable and you should continue to take them into consideration. However the latest Neighbourhood Plan draft has clearly addressed many of our previous suggestions and requests, which is very much appreciated.</p> <p>Generally, the transport related policies in the 'Revised Draft Redington and Frognal Neighbourhood Plan' (RFNP) are supported, as they align well with the draft London Plan (DLP), Mayors Transport Strategy (MTS) and our Healthy Streets and Vision Zero approaches to planning and transport in London.</p> <p>Policy 6.0 (FR Finchley Road: Shopfronts) includes community plans for this area, which are acceptable to TfL in principle.</p> <p>Finchley Road The A41 Finchley Road forms part of the Transport for London Road Network (TLRN) for which TfL is the highway authority. It is good that the Plan clearly states that any proposed works on Finchley Road would need to be agreed with TfL (para 6.1).</p> <p>However the plan appears to have removed references of the TfL Streetscape Design Guidance. This should be reintroduced as any changes to the TLRN must follow the guidelines in that document.</p>	<p>No action needed.</p> <p>TfL Streetscape Design Guidance is included as Evidence Base document (119), but the policy on Finchley Road - A Healthy Street has been deleted as it falls outside the remit of the Neighbourhood Plan. TfL were invited to draft a planning policy for Finchley Road, but did not respond.</p>
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	5.8.19 Camden comments	Forum response
<p><b>9.2 Guidance notes for developers</b></p> <p>Appendix SD Design Codes, 5.5.19</p>	<p>There are various references to these notes in the Plan but we couldn't find these on the Forum's website. As this hangs off a number of policies, it is important that the Council has an opportunity to review the guidance and provide a response. Other stakeholders may also wish to comment when this is available.</p> <p>It is also important to recognise that a considerable number of planning applications – particularly smaller-scale schemes are not made by developers but by individual householders. We suggest referring to 'applicants' where appropriate in the Plan and supporting documents as this more accurately captures 'who' is responsible for making planning applications.</p> <p>We note that the design code now forms a separate appendix to the Neighbourhood Plan. It is not referred to as such in the Regulation 14 document and therefore its status and how it should be applied is not entirely clear. Is this intended to form a part of the Guidance Notes to Developers?</p> <p>We suggest that there is an introduction to the design codes appendix (or section if it is to be included as part of the "Guidance Notes" explaining how it is intended to be used in decision making. It cannot have the same status as policy because it does not form part of the Plan – we understand the content is guidance and it would be helpful if this could be set out in the introduction.</p> <p>The Council still has some concerns about the effectiveness of the design codes – particularly the need for commentary to accompany photos &amp; drawings so the reader will be aware what they are showing. If the codes are not policy, then rewording of the text needs to be made where this reads as policy, ie. 'development must...'</p> <p>Further detailed feedback on this document after our comments on the main draft Plan.</p> <p><u>Comments on "Design Briefs for Aspirational Development Sites"</u></p> <p>Please insert an introduction setting out how the document is to be used in decision making.</p> <p>Page 5: "The Forum will need to liaise with Network Rail" – this will be the responsibility of the Council</p> <p>Page 10. "If the development does not begin within three years of the date of consent" – this is potentially confusing without further context.</p> <p>Page 11. "New residential units are to be complemented by..." this reads like a policy requirement: we suggest changing to 'should be complemented by'</p> <p>Page 13. "The entire site is therefore able to be designated only as an aspiration for the neighbourhood forum" – this statement is confusing because all the sites in this document are aspirations – we suggest this text is removed.</p> <p>Page 13. "the Plan would encourage a scheme" – this document is not part of the NP. We suggest changing "the Plan" to 'the Forum'.</p> <p>Page 15. "The accommodation is unlikely to provide accommodation of an acceptable standard" – without further evidence explaining why, this comment cannot be substantiated. We suggest removing this statement.</p>	<p>Forum response</p> <p>This was incorrectly titled on the website as Appendix SD Design Codes, 5.5.19 instead of Guidance Notes for Developers (now 9.2 Design and Landscape Guidance). It is the same document.</p> <p>Agree</p> <p>Further to these comments, Appendix SD Design Codes have been downgraded to Guidance (9.2 Design and Landscape Guidance).</p> <p>This is now section 9.3 Design Guidance for Possible Redevelopment Opportunities. Its purpose has been clarified with an introductory paragraph.</p> <p>This has been corrected.</p> <p>This has been removed.</p> <p>Changed accordingly.</p> <p>This has been deleted.</p> <p>Changed accordingly.</p> <p>The sentence has been deleted.</p>

DS 13	It's unclear how the refurbishment of this accommodation would make it "highly desirable" for key workers unless rents were capped.	Changed to "all age groups".
	"This must include the retention of the entire Finchley Road façade" – this goes beyond guidance, we suggest amending as follows: "This <del>must</del> <u>should</u> include the retention..."	This is an intact Victorian façade for which the Forum requests Local Listing. The wording has been changed to "should".
Page 16	Page 16: "Any replacement building must conform to the Redington Frognal BD and BGI policies" this goes beyond guidance, we suggest amending as follows: "Any replacement building <del>must</del> <u>should</u> conform to the ...."	Changed accordingly. Changed accordingly.

	Camden comments, 5.8.19	Forum response
<b>UD</b>	<b>Underground Development</b>	
7.3 application	As previously advised, the actual nature of any investigations/surveys/monitoring campaigns should be determined by the screening and scoping stages of the Basement Impact Assessment (BIA). In some instances, the Plan introduces requirements which would only be relevant for certain basement works, potentially with the result that unnecessary evidence is gathered.	
7.1.3	The statement about the Council's independent assessor must be removed from the Plan. It is injurious to their reputation and not substantiated. The Council will request the Examiner to remove these remarks from the Plan. We have asked the Forum to remove these comments on several previous occasions. We also strongly disagree with the inference that the Council/Campbell Reith do not already require "rigorous site investigations". Over recent years, the requirements of both the Local Plan and guidance have been regularly reviewed to ensure they mirror 'best practice' approaches for managing this type of development. The Council has reviewed and updated its basements CPG, most recently in 2018. We consider the approach mirrors RBK&C in all principal respects and therefore reference to the RBK&C document should be removed as it does not reflect the current situation	The statement relating to the independent assessor has been deleted.
7.2 UD criterion (iv)	"This includes ensuring that an underground stream or spring line is not diverted or concealed"- this does not recognise that a diversion may not have an unacceptable impact on the water environment. We suggest the text is amended as follows: "This includes ensuring that any diversion of an underground stream or spring line does not have an unacceptable impact". We don't understand why underground streams are at risk of being concealed – are they not concealed already (?)	This has been changed to "must have no adverse impact on:...iv Undergroud streams or spring lines, including through cumulative impact. This includes ensuring that an underground steam or spring line is not diverted."
7.3.1	The text should clarify the circumstances in which the Burland Scale damage level assessment will be required. We suggest rewording this paragraph as follows: "Justification for the assessment of the Burland Scale damage level assessment is also to be provided where there are properties within the likely zone of influence".	This amendment has been incorporated.
Bottom of page 60	"It is encouraged that the number, type and expected position of cracks to neighbouring properties are indicated, at the earliest possible stage". The building damage assessment should be able to say which parts of the structure are most at risk; however, the ability to pinpoint potential cracks in the way suggested is not feasible. We suggest this sentence is removed because this is not considered to be achievable.	This has been changed to "Evidence must be provided, at the earliest possible stage, that damage to neighbouring properties will be less than or equal to 1 ("very slight") on the Burland Scale."
Top of page 61	"This should include details of the structure and foundations of the existing building and neighbouring properties" This may not always be possible – a neighbour may not give permission for any inspections or investigations. We suggest the following rewording: "Where possible, tThis should include details of the structure and foundations of the existing building and neighbouring properties".	Amended accordingly.
7.3.1 criterion iv	Contours of predicted vertical settlement Like other aspects of the BIA, the need for their inclusion should be determined on a case by case basis depending on the results of the screening and scoping exercise. It is accepted that for some basement techniques they can be difficult to generate and where predicted movements are small, they are not always necessary. They should not therefore be required in on cases as suggested in section 7.3.1 – "the calculations must include..."	The text has been changed to "developers are encouraged to..."
7.3.2 criterion c)	"does not conceal or divert an underground stream or spring line; and..." This should depend on the impact on the water environment. We suggest the following rewording: "does not conceal or divert an underground stream or spring line which would lead to an unacceptable impact".	This has been changed to "must have no adverse impact on:...iv Undergroud streams or spring lines, including through cumulative impact. This includes ensuring that an underground steam or spring line is not diverted."
7.3.3	"based on ground characterisation provided by a qualified geologist" – a hydrogeologist is the right person for this. We suggest replacing "geologist" with 'hydrogeologist'	Amended accordingly.

<p>Page 62 2nd para; criterion ii.</p>	<p>"may need to be conducted in periods of contrasting rainfall and over a period of several months covering wet and dry seasons"</p> <p>This text seems to suggest that every summer is pretty wet and every summer is pretty dry. We agree that groundwater levels might only reach equilibrium over a few months and support gaining <i>representative</i> groundwater levels where pertinent to evaluating impacts. It's unclear what should happen if the investigation happened to coincide with six months of a really dry winter – in this instance would further monitoring be considered necessary?</p> <p>"The following information must be provided as a minimum and provide evidence that the ground will withstand underground development without causing any adverse impacts And iii. As a minimum, BIAs must incorporate the following information and data"</p>	<p>This now reads, "b) .....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, to gain representative groundwater levels. c) In some cases, when boreholes measurements show a groundwater risk, an automatic log water measurements recorder may need to be left activated in the boreholes over a sustained period of contrasting rain cycles....."</p>
<p>Page 62 2nd para; criterion iii. and criterion iv</p>	<p>This section includes detailed evidence requirements but does not allow any flexibility to reflect the nature of the basement scheme or what is achievable for each individual case. The text should allow for the possibility of exceptions replacing "must" with 'should' in the two paragraphs quoted.</p> <p>"iv The BIA must include appropriate drawings..." - this should be qualified by the outcomes of the screening and scoping stages of the BIA: "Depending on the outcomes of the screening and scoping stages, tThe BIA <b>must should</b> include appropriate drawings..."</p> <p>"In some cases, when borehole measurements show a groundwater risk, an automatic log water measurements recorder may need to be left activated in the boreholes over a sustained period of contrasting rain cycles to demonstrate local groundwater and water table levels and the local extent of groundwater surges during and immediately following storms."</p>	<p>Amended accordingly.</p>
<p>Page 62 criterion b)</p>	<p>This requirement is largely repeated by criterion c). We consider that the scope of investigation and monitoring should be determined by the scoping stage of the BIA and not pre-determined at the start of the assessment process. We suggest this is removed as a requirement or qualified by text stating "where this is required by the scoping stage of the BIA".</p> <p>"groundwater surges" – we understand that this term is not widely used and therefore needs to be defined/clarified further.</p> <p>"Bore holes data, ground movement and ground water flow calculations must be included..."</p>	<p>This was advised by Dr. Michael de Freitas and has been retained. "Groundwater surges" has been changed to "groundwater suirges / flooding".</p>
<p>Page 62 criteria d)</p>	<p>This should only be required where it is a necessary part of the BIA process. We suggest this is reworded as follows: "Where relevant, bBore holes data, ground movement and ground water flow calculations <b>must should</b> be included as part of a factual report..."</p> <p>This goes beyond what the BIA requires at present. We agree that the impacts should be assessed and any necessary mitigation incorporated but it is unreasonable to impose a blanket ban protecting any tree from being felled by a basement development. This takes no account of the value or significance of individual trees.</p>	<p>This was advised by Dr. Michael de Freitas and has been retained.</p>
<p>Page 63 criterion v)</p>	<p>We suggest this is reworded as follows: The BIA <b>must also demonstrate that trees will not be felled or liable to die. The BIA process should consider the impacts of basement development on trees and ensure that these are minimised. The Council will seek the protection of trees with significant amenity or biodiversity value and where the loss of a tree cannot be avoided, appropriate replacement planting.</b></p>	<p>This has been changed to "v. The BIA must also demonstrate that trees of category A or B, or included in the list of trees with a high value to insects (shown in accompanying document 8.2 Guidance Notes for Planning Applicants) will not be felled or liable to die."</p>
<p>Page 63 criterion ix)</p>	<p>The qualifications of individuals present at planning meetings is not something a neighbourhood plan is able to address. The Council's current requirements for chartered status and suitable experience are considered to be adequate. This criterion goes beyond what a neighbourhood plan is able to control. We suggest it should encourage these professional qualifications instead.</p>	<p>This was advised by Dr. Michael de Freitas and has been retained.</p>
<p><b>Thames Water response</b> 7.3.3 part vii</p>	<p>We support Policy 7.2 (UD Underground Development and Basements) and paragraph 7.3.3 part vii which relate to basement development.</p>	<p>No action needed.</p>

	Camden comments, 5.8.19	Forum response
<p><b>KR</b></p> <p>7.2 Kidderpore Reservoir</p> <p>7.2 Kidderpore Reservoir</p>	<p><b>Kidderpore Reservoir</b></p> <p>In the absence of a heritage statement confirming the Reservoir’s actual architectural or historic interest, we consider it is premature to have a planning policy which seeks to resist a “significant adverse impact on its architectural or historic interest”.</p> <p>The structure is unlisted and largely underground. Its main impact on the conservation area is creating a distinctive area of flat, open land on an area of high ground. The internal structure is generally not visible and the degree of alteration that might be appropriate can only be established through further detailed assessment. We suggest the first paragraph is reworded as follows:</p> <p>“Development proposals affecting Kidderpore Reservoir must have no significant adverse impact on its <b>will be expected to appraise the architectural or historic interest</b> of the reservoir structure and or on <b>,including</b> the contribution it makes to the special architectural or historic interest of the Redington Frogna Conservation Area”.</p> <p>As set out in para. 3.6.1 we do not consider that the ANGSt is particularly relevant to the circumstances of a largely built- up area such as Camden. We suggest the reference to ANGSt is replaced by a generic reference to the desirability of increasing access to public open space.</p>	<p>A Heritage Statement has been commissioned and this will also be useful for the update of the Redington Frogna Conservation Area appraisal. Confirmation of historic interest is also provided in the Evidence Base.</p> <p>The requirement to appraise the architectural or historic interest has not been incorporated and the wording "must have no significant adverse impact on ....." has been retained.</p> <p>The Vision and Objective aim is for "a community-supported nature reserve, on the site of the covered water reservoir in Platts Lane, in the event that the reservoir should be declared redundant."</p>
<p><b>Historic England response</b></p> <p>General</p>	<p>In respect of the inclusion of the policy to promote sensitive adaptation of the Kidderpore Reservoir in the event of this becoming redundant we would recommend clearly stating the contribution and significance of the reservoir to the character and appearance to the conservation area. We note the intention to recommend the structure for inclusion in the list of non-designated assets however it would seem appropriate to set out the wider contribution to the conservation area and if the intention is to identify the structure as a community asset to consider whether this may qualify under the Assets of Community Value process (Localism Act 2011). We would suggest the local planning authority would be best placed to advise you in this respect.</p> <p>However, Historic England does publish a range of advice in respect of Neighbourhood Planning (including Assets of Community Value) which you may find helpful in finalising your Draft Plan  <a href="https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/</a>  <a href="https://historicengland.org.uk/advice/hpg/har/crb/">https://historicengland.org.uk/advice/hpg/har/crb/</a></p>	<p>The structure is below ground and not currently visible.</p>

**Camden Comments on Design Guidance Appendix**

**NB this is now included in 9.2 Design and Landscape Guidance**

Page 1. “follow the roofline” – we suggest this is deleted as it is too prescriptive.

Page 2. In line with our comments on Policy SD2.4 we don't consider that a requirement for minimum gaps is justified because this does not take into account the circumstances of each individual site/location. We suggest rewording as the plot proportions text as follows: “Where appropriate, a minimum gap of 4 metres....”

Appendix BD 4.1 “Proportions must match adjacent houses of the same building type” It needs to be clearer what this means/what is intended, for example as part of the ‘façade style’ do all of the windows need to be in the same position and the same size? “Must match” is overly prescriptive – we suggest replacing this text with ‘should respect’.

Page 3. “is not acceptable” – as this is not a policy document, we suggest this text is replaced with “is unlikely to be not acceptable” – this allows discretion for a decision maker to consider the merits of a proposal.

Page 4 and 5 – we suggest removing the phrase “A medium to high levels is expected” because it is highly subjective and may not be the most appropriate design approach in all cases. We also consider this to be in conflict with the design objectives of para. 127 of the NPPF i.e. “while not preventing or discouraging appropriate innovation or change”. It would be helpful if some/all of the photos were accompanied by commentary setting out what is considered to be good/bad about the features shown.

Page 6 – “to match” – we consider this to be too prescriptive and suggest rewording as ‘should respond to the existing building’. As with the comments for pages 4 and 5, it would be helpful if some/all of the photos were accompanied by commentary setting out what is considered to be good/bad about the features shown.

Page 7 – to provide greater flexibility we suggest rewording as follows: “Any Where appropriate, a new detached house shall respect the existing height and roofline of adjacent houses”.

It is not clear what the two diagrams at the bottom of page 7 show – please provide commentary.

Page 8 - In line with our comments on Policy SD2.4 we don't consider that a requirement for minimum gaps is justified because this does not take into account the circumstances of each individual site/location. We suggest rewording as the plot proportions text as follows: “Where appropriate, a minimum gap of 4 metres....”

BD Policy 4.2 “must match” – we consider this is too prescriptive and should be replaced with ‘should respond to’.

Page 9. "is not acceptable" – as this is not a policy document, we suggest this text is replaced with "is unlikely to be not acceptable" – this allows discretion for a decision maker to consider the merits of a proposal. The second sentence should be reworded for the same reason as follows: "Original porches ~~must~~ should be retained and balconies are likely to be resisted ~~may not be added~~ where they are not an original architectural element'.

Page 10 we suggest removing the phrase "A medium to high levels is expected" because it is highly subjective and may not be the most appropriate design approach in all cases. It would be helpful if some/all of the photos were accompanied by commentary setting out what is considered to be good/bad about the features shown.

Page 11 "to match" - we consider this is too prescriptive and should be replaced with 'should respond to'. It would be helpful if some/all of the photos were accompanied by commentary setting out what is considered to be good/bad about the features shown.

Page 12 "must not exceed that of adjacent buildings" – this is overly prescriptive and not appropriate for a guidance document. We suggest rewording as 'Development should respect the prevailing heights in the area'. We think the intention is to influence height (which is what the photos show) rather than numbers of storeys. If this is the case, references to storeys should be removed.

It is not clear what all of the diagrams at the bottom of page 12 show – please provide commentary. Page 13 – "must indicate" – to allow flexibility we suggest rewording as follows: "should indicate"

Page 15 we suggest removing the phrase "A medium to high levels is expected" because it is highly subjective and may not be the most appropriate design approach in all cases. It would be helpful if some/all of the photos were accompanied by commentary setting out what is considered to be good/bad about the features shown.

Page 16 "to demonstrate a respect" – we suggest rewording as 'should respect

Page 17 and 18 – we consider it would be helpful for some commentary explaining why these developments are considered to be positive in design terms. As these schemes have not been assessed against a design code, we consider that the phrase "local conformity" should be removed.

Page 19 – we don't consider that a planning document should be used to promote a particular architect.

Page 20 - "Building heights must not be increased" and "heights must not exceed six storeys) this is overly prescriptive and not appropriate for a guidance document. We suggest rewording as 'Development should respect the prevailing heights in the area', removing reference to a storey limit as this goes beyond what this document can influence.

Page 21 – "must retain" – to allow flexibility we suggest rewording as 'should retain'. Also "are to be retained" (x2) we suggest is replaced with 'should be retained'.

Page 23 "The proposed proportions, materials and details shall reinstate or maintain the original design between each building". This is not entirely clear – we suggest rewording as follows: 'Proposals should be informed by the original design of the building where relevant and where good examples exist of original shopfronts and materials these should be retained/ restored'. We also suggest replacing "as a whole" with 'where appropriate'.

Pages 25-27 – some commentary about the positive attributes of these shopfronts would be helpful.

Page 28 – it is not clear why this image reappears. We don't consider that a planning document should be used to promote a particular architect.