

Reference	Comment by Local Borough of Camden	Reason	Forum Response
Para. 3.7a	Recommend replacing 'Neighbourhood Plan' with 'Appendix 2'.	For clarity and consistency if supporting text specifically referred to Appendix 2 rather than the Neighbourhood Plan. This would improve clarity for decision making and ensure conformity with paragraph 17 of the NPPF.	Agree
Para. 3.7 d	Recommend that this criterion asks applicants to set out their reasons for the proposed massing and elevational elements regardless of scale.	As presently worded, this suggests that proposals only need to be justified if they are “larger” or “smaller” than surrounding buildings and appears to exclude schemes which are the same or similar. We assume this is unintended. This would improve clarity for decision making and ensure conformity with paragraph 17 of the NPPF.	Agree
Para. 3.7 d & h	Recommend that references to 'building' are replaced with 'the 'proposal' (as per criteria b. and g.) or 'development' to make the policy clearer and easier to understand.	The references to 'building' could be confusing as there could be more than one building within a site and the term may be read as referring to standalone structures rather than, for example extensions.	Agree.
DH3 (3)	Recommend that the policy includes considerations that may be applied by the Council when assessing the suitability of such developments.	We support the intention behind this approach but concerns that this reads as a blanket restriction. It would be helpful if the criterion identified the considerations against which these proposals will be assessed.	

<p>NE2 (3)</p>	<p>Recommend that this criterion requires tree We agree this is something that should be encouraged in all developments where it is planting in major developments where site conditions allow. We note that encouragement of tree planting is also addressed by Policy NE4 criterion 1(b).</p>	<p>We agree this is something that should be encouraged in all developments where it is possible to plant additional trees, however it is likely to be much harder to deliver on smaller, constrained sites and it is not likely to be reasonable, or viable, to expect applicants to plant trees in conjunction with householder extensions. As drafted the policy conflicts with paragraph 206 of the NPPF which states “planning conditions should only be 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 believe this is reasonable for the future. We are asking for space for <i>FUTURE</i> planting, not that the developer or householder plants trees now, since if they are not there at the time of development this cannot be enforced. Every property that has a form of garden though could have space left for a tree/trees however small (trees in pots don't count), even if this is not the wish of the current owner. This is looking after the interests of future owners and enabling the CA to retain its integrity against the stated and entrenched beliefs of some developers that all house purchasers hate trees. We frequently experience extensive hedge clearance and submissions of Section 211 Notices of Intent requesting tree clearances by developers soon after purchase and prior to their submission of planning applications. When trees are not spectacular, particularly when these trees are not in front gardens, it is hard for Camden Tree Officers to refuse and place TPOs on them with the current legislation. With this point inserted in the HNP, Camden Tree Officers can rule on what is appropriate for the plot and its immediate surroundings in the CA e.g. town centre or backing onto the Heath or a biodiversity corridor. Precise is hard, but a lot of planning is subjective.</p> <p>Commenting on the Camden Local Plan 6.69: We are proposing a third category in addition to 'retained' and 'proposed' trees for 'leafy' Hampstead, namely future space for trees. The messages here are: leave space for trees in the future even if you don't want them now; 'local conditions' means that this doesn't have to be huge or unreasonable.</p> <p>Two strategically important landscape corridors meet up in Hampstead: the Hampstead Ridge, Nash Ramblers Link, and North London Line Link.</p>
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			Points 4.25-4.28 in HNP, Camden Local Plan 6.51; 6.56; it is one step further than the CLP A3 Biodiversity policies but adds some future-proofing to these policies that support Hampstead's particular qualities, biodiversity values and the settings for its buildings.
NE2 (4)	Recommend that the word "strictly" is deleted	The word strictly is unnecessary as the policy's objective will be met where veteran trees are protected.	We added the word for emphasis.
NE2 (4)	Recommend that the "exceptional circumstances" (canopy reduction) are clarified in the supporting text.	Without further explanation, the criterion will be difficult to apply when assessing planning applications contrary to the NPPF para. 17.	<p>We could clarify by adding the following language: <i>"Exceptional circumstances would include cases where canopy reduction is required to provide access where machinery is vital to allow construction or to protect neighbours' property and there are no other alternatives. Evidence should be provided that alternatives do not exist."</i></p> <p>We do not believe that cost and viability are exceptional factors in these circumstances.</p>
NE3 (4)	Recommend cross reference in the supporting text to Camden Planning Guidance to explain when the Council will require biodiversity surveys ("subject to their scale and location...")	It is currently unclear in the plan the thresholds for when these surveys will be sought, contrary to the NPPF para. 17.	<p>We suggest the following revised language:</p> <p><i>4. "Applicants should show in their proposals how they plan to enhance both biodiversity and habitat."</i></p> <p>Habitat is a critical word here. While of course, like Camden, we are keen to protect endangered species, we are keen to protect wildlife habitat in general. The lack of an endangered species is not an argument for removing all wildlife habitat.</p> <p>There is no use putting in bird and bat boxes if the bats have nothing to feed on because all habitat has been removed.</p>
NE3 (5)	Recommend that	We support the proposal in relation to Veteran Trees.	Who would this be extremely onerous for? Each development only has the possibility of one historic

	reference to biodiversity corridors and historic tree lines is removed to allow the effect of proposals to be considered on a case-by-case basis. We also suggest moving this criterion to the Plan's chapter on basements.	Applying this policy to all biodiversity corridors and historic trees lines would be extremely onerous and would prevent sustainable development from being delivered, contrary to the NPPF, para, 16. The Plan does not set out sufficient justification for resisting basement development in these areas.	tree line or biodiversity corridor to account for. This is supporting the CA setting. We would not object to moving this criterion to the basement section.
NE4 (1c)	Recommend replacing the criterion with wording that seeks the use of surfaces that will deliver gains in biodiversity.	As worded, the criterion may not lead to an increase in biodiversity as "permeable surfaces" can include harder landscaping forms such as permeable paving. The policy also needs to be flexible because biodiversity is one consideration that has to be taken into account in the planning process, alongside matters such as ground conditions, effectiveness and cost.	This is a good point. We need to include permeability to help with run off, but there are some more up-to-date ways of improving biodiversity, even for parking areas. We suggest new language: <i>'In order to enhance biodiversity, development proposals will be encouraged to:</i> <i>c. Increase the area of permeable surfaces, particularly those that incorporate biodiversity-enhancing features such as gravel turf (e.g. Schotterrasen)'</i>
Policy BA1 and BA2		The Council appreciates that the control of basement development is an important issue for residents in Hampstead and other parts of the borough. In response, the Council has developed a robust policy approach in its Local Plan supported by detailed supplementary guidance and based on expert evidence, within the context of the powers available to it under planning legislation and policy. The comments on the basement policies therefore relate to consistency with national planning policy and the Council's basement policy and are intended to ensure that the approach in the neighbourhood plan can successfully operate	For responses to all the comments on the basement section, please refer to pages 113 to 122 in the Consultation Statement.

		alongside the Council's approach.	
Para. 5.12 (a)	Recommend that the criterion is reworded so that these measurements are only sought where this can be justified according to a basement scheme's risk assessment.	<p>It is unclear why this is necessary and should apply to all basement schemes or what the justification is for this approach. It does not allow an assessment of issues that would specifically relate to the proposed basement scheme. As a result, the approach is too onerous and not in line with para. 193 of the NPPF and contrary to the approach in the adopted Camden Local Plan.</p> <p>In the "Geological, Hydrogeological and Hydrological Study" undertaken for Camden (link to Arup Study), it is presumed that a sitespecific ground assessment is provided in almost all cases. The principle of impact assessment is that a staged process is followed with the appropriate scope of any investigation (i.e. depth and number of boreholes, type and duration of water monitoring) being informed by the screening study and the basement proposals.</p> <p>Prescriptive guidance runs counter to the Council's established principles of iterative assessment, as required by Local Plan policy A5 and Camden Planning Guidance.</p> <p>Guidance on the scope of a ground investigation is set out in the standard 'Eurocode 7' (the European Standard for design of geotechnical structures), which states that in competent strata (in Camden this could mean the Bagshot sand, river terrace gravel or London clay), samples should be obtained to a depth of 2 metres below the proposed foundation. It is possible there are cases where a lesser depth is sufficient for the impact to be correctly assessed.</p>	See above.
Para. 5.12	Recommend that the	It is unclear why this would be required in all	See above.

(b)	<p>critterion is reworded so that these measurements It is unclear why this would be required in all cases, particularly if the risk assessment has not found any groundwater risk. The approach are only sought where this can be justified according to a basement scheme's risk assessment.</p>	<p>cases, particularly if the risk assessment has not found any groundwater risk. The approach does not allow an assessment of issues that would specifically relate to the proposed basement scheme. As a result, the approach is too onerous and not in line with para. 193 of the NPPF and contrary to the approach in the adopted Camden Local Plan. Whilst this may be required in some situations, the groundwater regime in much of the Borough is straightforward and can be assessed and mitigated against without the need for extensive monitoring. For example, where foundations bearing on the London Clay are being deepened to create a basement (a very common situation), the basement proposals have no bearing on the groundwater regime and contingency measures such as waterproofing and temporary dewatering can be designed without this regime of monitoring.</p>	
Para. 5.12 (c)	<p>Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.</p>	<p>This is a duplication of Camden's existing policy and seeks the same things as the Council's 'Basement Impact Assessment' (BIA). This will be confusing to applicants and planning officers.</p>	See above,
Para. 5.12 (e)	<p>Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.</p>	<p>This is not sufficiently specific and will be difficult to apply for development management purposes. The Plan does not indicate what these documents might contain. This is contrary to paragraph 154 of the NPPF which states that "Only policies that provide a clear indication of how a decision maker should react to a development should be included in the plan". Moreover, the Council already</p>	See above.

		requires information on flooding and hydrological issues to be provided in a BIA.	
Para. 5.12 (f)	Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.	<p>“Identification of the location and distance of the property from areas identified as flood risk in the Strategic Flood Risk Assessment prepared for Camden by URS in July 2014.”</p> <p>No evidence has been presented to justify why these are required in addition to the requirements of the Council’s detailed and professionally developed methodology for assessing the impacts of basement schemes. It is also unclear whether these are intended to be included as part of Camden’s BIA or as separate documents. These requirements are not considered to be “relevant, necessary and material” to all basement applications, contrary to paragraph 193 of the NPPF.</p>	See above.
Para. 5.12 (g)	Recommend that this should not be included as a requirement but replaced with a statement that it is desirable or would be encouraged.	<p>“A cross section of ground geology should be reported and drawn through comprehensive cross sections, reports and graphs”.</p> <p>Camden Planning Guidance 4 (July 2015) requires a ‘conceptual ground model’ which should give a clear description of the ground and groundwater conditions and show how they relate to the basement proposals. In much of Camden, the ground and groundwater conditions are very straightforward (made ground over London clay or river terrace gravels over London clay) and ground levels vary little. Whilst cross-sections can be helpful in some cases, they should not be mandatory for all schemes.</p>	See above.
Para. 5.12 (h)	Recommend that this should not be included as	This is already covered by Camden’s BIA process which requires hydrological modelling, where hydrological issues are identified as a	See above.

	a requirement but replaced with a statement that it is desirable or would be encouraged.	risk. The Council requires, where identified as a risk, a conceptual ground model, which contains all the known geological (encompassing hydrological and hydrogeological as well as stratigraphic) information about the site and the physical processes which affect it. The ground model is an explanation of how the site works.	
Para. 5.12 (i)	Recommend that the criterion is deleted	Planning policy cannot require a Schedule of Condition Survey for third party land or buildings; this is covered by the Party Wall Act. Because it relates to another legislative regime it cannot be dealt with through a planning policy.	See above.
BA 2 (1)	Recommend that the policy is reworded to clarify that Basement Construction Plans will only be required when the BIA has indicated one is necessary, as stated in para 5.14 of the neighbourhood plan.	<p>Basement Construction Plans should only be required when a need has been identified, not in all</p> <p>The criterion conflicts with the wording in para. 5.14 of the Neighbourhood Plan. While we support the latter, the criterion, if applied as worded, is too onerous and contrary to the NPPF, para. 193.</p> <p>It is unreasonable to require Basement Construction Plans on all schemes irrespective of their size and likely impact. These have only been found to be necessary in Camden on a small number of basement developments. Camden's adopted policy is that "Basement Construction Plans may be required when a instances regardless of need.</p> <p>Basement Impact Assessment shows acceptable estimated effects but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring</p>	See above.

		properties. If a Basement Construction Plan is required this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation. (Local Plan paragraph 6.127)	
BA2 (2)	Recommend that the criterion is deleted.	These matters set out in Policy BA2 (2) are already covered by the Council's existing Basement Impact Assessment process as set out in the Camden Local Plan and supplementary guidance. The requirements in the neighbourhood plan introduce unnecessary duplication and confusion. The approach is contrary to paragraph 193 of the NPPF which states "Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question"	See above.
BA2 (4)	Recommend that the criterion is restricted to the matters referred to in Camden Local Plan Policy A5.	"All issues" is insufficiently precise and potentially too onerous, contrary to the NPPF, paragraph 193. "The fullest extent possible" is also open to interpretation. As a result, this could be difficult for development management officers to apply. To gain planning permission for a basement a developer needs to demonstrate to the Council that the proposal would not cause harm to neighbouring properties, the structural, ground, or water conditions of the area, the character and amenity of the area, the architectural character of the building, and the significance	See above.

		<p>of heritage assets (Local Plan policy A5). These are the main relevant planning issues for basements, and they need to be resolved before a permission for basement development is granted. A developer can only secure a planning permission for basement development where these impacts have been demonstrated to the satisfaction of the Council, using appropriate evidence, in line with the Local Plan policy, Camden Planning Guidance, and the ARUP methodology.</p>	
BA2 (5)	<p>Recommend that criterion states that the need to provide Basement Construction Plans is determined through the BIA process, in line with Camden's adopted Local Plan. The reference to Party Wall matters should be deleted as this cannot be addressed by planning policy.</p>	<p>The need to provide basement construction plans in accordance with the Council's policy is not dependent on whether a basement scheme has predicted levels of damage above Burland Level 0 (which is likely to result from any construction works, basement or otherwise). In any event it is not practical for the Council to request that basement construction plans require that Party Wall Agreements are in place before approving it. Party Wall matters are covered by other legislation and are therefore not a material consideration in planning matters.</p>	See above.
TT1 (1)	<p>Recommend that the criterion states that the applicant will need to demonstrate that proposals will not have an adverse effect on local air quality. The supporting text should</p>	<p>As worded the policy implies that a TA or TS would be needed even if there was likely to be one additional vehicle movement. This is contrary to the NPPF para. 193 which states: "Local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals</p>	<p>For responses concerning Traffic and Transport, please see two other documents: "Part 2 - HNF Responses to comments from LBC and TFL- January 2018 – Traffic & Transport Section –v3" and " Part 3 - Assessment of Neighbourhood Policies against Emerging London Plan – December 2017"</p>

	clarify that assessments will be sought in line with Camden Planning Guidance.	and reviewed on a frequent basis. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question”. A local justification for requiring this evidence in these circumstances has not been provided. We note that the policy wording recommended by the Health Check report did include a threshold. The criterion creates a degree of confusion. Air Quality Assessments focus on pollution issues but TAs/TSSs and DSMPs do not. The latter address number of vehicle movements/’trips’ and the impact of traffic on residential amenity.	
TT1 (3)	Recommend that the criterion states that the applicant will need to provide Construction Management Plans where appropriate. The supporting text should then clarify that assessments will be sought in line with Camden Planning Guidance	As worded the policy implies that a CMP would be needed even if there was likely to be one additional vehicle movement. This is contrary to the NPPF para. 193. A local justification for this approach is not provided. Camden Council currently seek these documents for major schemes and other applications where there are likely to be significant impacts, e.g. sites on narrow lanes or constrained sites. CMPs principally address impacts of construction traffic such as noise, vibration, obstruction of the highway etc. rather than air quality.	
TT2 (2)	Recommend “and charm” is deleted from the criterion.	This is difficult to define or measure. For clarity and predictability in decision making in line with NPPF para 17 the term charm should be removed.	
TT2 (3)	Recommend that reference to speed limits is	Planning policies cannot deal with speed limits as this is covered by other legislation.	

	removed from the policy.		
TT2 (5)	<p>Recommend that the reference to additional crossing points clarifies that this is subject to a need being generated and viability. The design of crossing should take into account the character of the area. References to aesthetics and being mindful of others should be removed.</p>	<p>It would not be reasonable to expect all schemes to provide crossing points as these would be sought by the Council subject to the level of need arising from a proposed development and viability. The criterion is contrary to paragraph 204 of the NPPF which states that planning obligations should be directly related to a development.</p> <p>It is unclear what is meant by “aesthetic appeal” and no guidance is provided on how the potential tension between public safety and effect on an area’s aesthetics might be managed; road crossings have to conform to national standards for the purposes of safety and visibility. The approach is likely to be difficult to implement contrary to paragraph 17 of the NPPF.</p> <p>It is also not clear what measures might be required for users to “regard the street as a shared space”, or where this might be delivered. Shared surfaces are a particular type of highways scheme that involves removing separation between pedestrians and motorists (e.g. Exhibition Road, London). It is unclear whether this is what is being sought by the criterion. “Hence be mindful of others” cannot be assessed when considering a scheme.</p>	
TT2 (6)	<p>Recommend that the criterion is reworded to aid implementation. It should be focussed on minimising</p>	<p>This raises a similar issue in terms of how the potential tension between public safety and effect on an area’s aesthetics might be managed. The criterion could seek the minimisation of street clutter to improve permeability and legibility and where additional</p>	

	<p>street clutter and where additional street furniture is required, this should be sympathetic to the streetscene. Reference to "width restrictions" should be removed.</p>	<p>street furniture is necessary, this should be sympathetic to the character and heritage of the area. Width restrictions cannot be controlled through planning policy.</p>	
<p>TT2 (7)</p>	<p>Recommend that the criterion should be subject It will only be appropriate to secure these measures for certain developments, i.e. where sufficient need arises from the proposed to the needs generated by a scheme and viability.</p>	<p>It will only be appropriate to secure these measures for certain developments, i.e. where sufficient need arises from the proposed scheme. The approach conflicts with paragraph 73 of the NPPF "Ensuring viability and deliverability" and paragraph 204 which sets out the statutory tests that must be met where planning obligations are secured.</p>	
<p>TT3 (1a)</p>	<p>Recommend that references to care homes and medical establishments are removed. The policy should allow applicants the ability to submit evidence to the Council relating to the particular accessibility of their site/premises if they</p>	<p>The policy would be overly onerous in relation to medical uses and care homes as it would impose a blanket restriction on these uses in all but a small part of the neighbourhood area, i.e. where the PTAL rating is 5 or above. Consequently, it would not be possible to provide a new doctors surgery (or extension of an existing facility) or care home in most of the neighbourhood area. Doctors surgeries and care homes have different travel patterns and peaks compared to educational establishments. The policy is not supported by</p>	

	<p>consider it is well served by public transport.</p>	<p>evidence to justify taking such an approach. We do, however, recognise there is a significant impact on Hampstead relating to the school run and the issues are identified in paragraph 4.33 of the adopted Camden Local Plan and therefore we would support this part of the policy.</p> <p>PTAL levels are arranged according to a grid and cannot accurately predict accessibility for every site/premises. Within each grid square, actual accessibility can vary. The policy should allow applicants to submit additional supporting information to the Council so the accessibility of the site can be clarified, recognising that PTAL has some limitations.</p>	
TT3 (1b)	<p>Recommend that the policy has a presumption of steering development towards PTAL5 which generates the number of trips mentioned but retains flexibility for other sites when applicants are able to successfully demonstrate that the impacts can be mitigated.</p>	<p>We support the intent as the Council already seeks to direct development to sites proportionate to the numbers of trips a scheme generates. However, we have a concern about its implementation as worded. PTAL 5 or above covers only a minority of the designated Hampstead Town Centre. The rest of the Town Centre is within PTAL 3 and 4. The policy would effectively be applying a different approach to uses within different parts of the designated Hampstead Town Centre. Town centres are by their nature suitable in principle for new retail development. Paragraph 9.3 of the adopted Camden Local Plan states that the Council will ensure that “such development takes place in appropriate locations, having regard to the distribution of future retail growth and the hierarchy of centres established by this policy”.</p>	
TT3 (2)	<p>Recommend that the criterion is reworded as it</p>	<p>If this criterion is applied with criterion 1 as worded, it could make potential developments unviable as the cost of elevating a site from</p>	

	would not be realistic to expect applicants to undertake these measures. It would also not be reasonable to restrict medical uses or care homes to areas within PTAL 5.	lower PTAL levels may be prohibitive and therefore, Criterion 2 is unlikely to be effective. The approach conflicts with paragraph 73 of the NPPF “Ensuring viability and deliverability” and paragraph 204 which sets out the statutory tests that must be met where planning obligations are secured. For example, the most accessible locations in London are in proximity to London Underground stations which it would not be possible for developments to provide.	
TT4	Recommend that references to “apartments” is replaced by residential development	The policy refers to “all residential developments” and “apartments”. We believe it is intended to apply to all residential developments and this should be used consistently throughout in line with the NPPF, para. 17.	
TT4 (1 & 2)	Recommend that the policy requires cycle parking to meet these characteristics unless the applicant can demonstrate to the Council’s satisfaction that there are circumstances why it is not appropriate or possible.	“within the curtilage of the building” & “under cover” and “step-free access” – while these are desirable, it will not be possible to secure these in every case. As worded, the approach is too restrictive and the Council would have to resist new cycle parking which did not meet these requirements, potentially reducing the amount of cycle parking that can be delivered. Due to the range of different sites, buildings and cycle users, it would not be reasonable to impose any of these requirements to every scheme. The Council’s Camden Planning Guidance on Transport (link to Camden Planning Guidance) already provides detailed advice on cycle parking facilities. It states that cycle parking should be provided off-street, within the boundary of the site. It also states that cycle parking needs to be accessible and secure. The full details are set out in paragraph 9.8.	
TT4 a. b. &	Recommend that the	The approach has the effect of simplifying the	

c	policy is brought into line with the London Plan to ensure that there is no under-provision of cycle parking.	approach set out in the London Plan cycle parking standards (Table 6.3) and is likely to reduce the overall amount of cycle parking that can be secured by the Council, contrary to the Neighbourhood Plan's objectives. The London Plan seeks the provision of both <i>short stay</i> and <i>long stay</i> cycle parking spaces, which means that together the overall number of spaces sought may be greater than the Neighbourhood Plan requires.	
EC1 (4)	Recommend that the policy and supporting text is reworded to clarify that The policy refers to "businesses located directly above shops" and the supporting text refers to the importance of retaining "ancillary the policy seeks the retention of both retail and office floorspace.	The policy refers to "businesses located directly above shops" and the supporting text refers to the importance of retaining "ancillary space, such as storage or workrooms". It is believed that the intention of the policy is to protect any Class A or B1a uses at first floor level or above.	Agree.
HC1 (2)	Recommend that the policy allows flexibility for the amalgamation of dwellings or a change of use where the accommodation is substandard. The supporting text should clarify what constitutes a 'small' dwelling in terms of floorspace.	There appears to be overlap / duplication between criteria a. and b. as both seek to resist the loss of small self-contained dwellings, which may cause confusion. Also, the policy approach does not allow any flexibility, for example where existing small dwellings do not provide satisfactory accommodation, e.g. poor outlook or excessively small. The policy does not provide guidance on what constitutes a small dwelling – there are dwellings with 1 or 2 bedrooms that are significant in terms of their floorspace.	The Forum's intention is to reduce the loss and encourage the provision of studio and one bedroom flats in both public and private sectors. We suggest the omission of 'small' throughout and where necessary the introduction of 'studio and one bedroom flats having areas up to those required by CPG2'. The claim of 'substandard' should not be allowed as a reason for loss, but as a reason for upgrading and improving a dwelling. Agree that 'affordable housing' be defined throughout HC1(2) as including:

			<p>social and affordable rented housing, intermediate housing, and community-led housing. (See Camden's draft CPG2 and the Community Land Trust comment of 21.11.17).</p>
<p>HC2 (3)</p>	<p>Recommend that the policy acknowledges the continuing viability of the facility to ensure the approach is in line with Policy C2 of the adopted Camden Local Plan</p>	<p>It is not possible to use a planning policy to require the Council or another body to provide a community service if that service is no longer viable. As worded, the approach is not in conformity with part g (ii) Policy A2 of the adopted Camden Local Plan that states existing community facilities are retained...unless "the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area". Viability should therefore be acknowledged as a consideration.</p>	
<p>HC3 (1)</p>	<p>Recommend that the plan is clearer about how the improvements might be implemented through the planning process and in particular, what might be improved in these spaces.</p>	<p>This criterion could potentially be misconstrued by giving the impression that development of the named spaces themselves will be supported to deliver environmental improvements. The policy approach is vague as it does not clarify the existing environmental qualities of these spaces and how each one might be improved. It is understood these spaces have been identified as the potential beneficiaries for CIL funding or Section 106 planning obligations.</p>	

Response by	Comment	Forum response
Rajvinder Matharu, Asset Strategy and Valuations, LBC	Argues that a small section of land within the curtilage of Branch Hill House as shown in Appendix 2 is designated as open space which we contend is an error in the original designation, if the designation is not corrected, and the land excluded from the sale, it will be landlocked and incapable of beneficial use.	
Historic England	No detailed comments.	
TfL	Makes a number of comments (Clyde, how do you want to handle these?)	
Sanya Polescuk, Community Land Trust	Offers alternative wording to HC1	Agreed See comment to `HC1 Housing Mix`
Stephen Ainger, Downshire Hill Residents Association	Comments on description of Character area 4, 19 th century expansion; writes in support of BA1, BA2 (4) and BA2 (5); Suggests that vision of a shared space scheme for South End Green would only be supported if there were no diversion of traffic to other side streets.	Appendix 2 (Character Areas) has been amended: reference to `Victorian` omitted in the first line of `Character Area C` & description of Downshire Hill and Keats Grove introduced. The first paragraph now reads: “The suburban neighbourhoods developed on the original estates and landholdings south and east of the village core and can be clearly distinguished by their planned appearance and typical urban streets lined by rows of houses. A number of development types can be found in this wider area from dense terraced streets (e.g Willoughby Road) to rows of semi-detached or paired terraces (e.g Hampstead Hill Gardens) to detached houses (e.g Frognal, Keats Grove). The Downshire Hill and Keats Grove area was the first to be developed from about 1815 with elegant Regency stucco villas and brick flat-fronted late Georgian terraced houses. This area is more spacious than the later higher density, mainly brick, Victorian areas.”
Thames Water	Suggests that the Plan adopt language requiring proposals demonstrate that there is adequate waste water capacity and	We have no objection in adopting language similar to that in the Kentish Town NP if Camden thinks this subject is not adequately covered by the

