

Hampstead Neighbourhood Forum responses to comments on the
Submission Draft, January 2018

Traffic & Transport Policies TT1 to TT4

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Comments received in black

Hampstead Neighbourhood Forum Response in blue

Amendments recommended by Hampstead Neighbourhood Forum in red.

Introduction

Origin	Subject	Comments
TfL	London Plan Para 6.3	<p>Para 6.3 notes the strength of local feeling on matters of congestion and pollution. It is important to note that a highly effective way of tackling those issues is the promotion of alternative sustainable and active modes of transport. The Forum may wish to highlight that point prominently and explicitly reference the new London Plan (draft available from https://www.london.gov.uk/what-we-do/planning/london-plan/newlondon-plan).</p> <p>Noted. Whilst the Neighbourhood Plan supports the mode shift promoted by the draft London Plan, the Forum also recognises that a significant proportion of vehicle journeys relate to start and end points which are outside the Plan area and that the mode shift required is common to all parts of the London area. In view of this it would suggest that it would be preferable to limit the Plan to policies which are specific to the Plan area.</p>

Policy TT1 - Traffic Volumes & Vehicle Size

Ref	Origin	Subject	Comments
1	TfL	Offset Para 6.16	<p>Para 6.16's statement that where development which may generate new car trips is consented in the plan area, "it may be necessary to offset any increase through other measures so that a development does not lead to an overall increase in traffic volumes within the Plan Area", is strongly supported by TfL Planning.</p> <p>Effective measures can include DSPs, CLPs and Travel Plans secured by condition and/or in Section 106 agreements, where appropriate with a financial bond payable to the Council should the share of car trips generated by the development stay the same or increase in the early years of occupation. Furthermore a car free development should generate very little traffic and thus should be promoted at the planning stage.</p> <p>Funding for more specific sustainable and active travel promotion measures targeting new residents or other users can also be secured, for example giveaways of free Oyster credit, cycle purchase vouchers and the Cycle to Work scheme, Cycle Hire memberships and events and initiatives such as personalised travel planning, walk and/or cycle to work weeks, rewards (e.g. free breakfast) for switching away from cars, cycle training, guided walks, marketing of local public transport, and physical improvements such as cycle parking and traffic calming measures in the vicinity of a development site (although these should be secured upfront at planning stage wherever possible). The above is additional to Travel Plans for school mentioned above and the TfL workplace initiatives to which I have also already referred TfL will be issuing new Travel Planning guidance by late 2018 or early 2019, also linked to adoption of the new London Plan, as Policy T4 part B states: "Travel plans, parking design and management plans, construction logistics plans and delivery and servicing plans will be required in accordance with relevant Transport for London guidance." The current London Plan similarly states (Policy 6.3 part C) that "Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance.</p> <p>Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be coordinated with travel plans."</p>

Ref	Origin	Subject	Comments
			Noted
2	TfL	Offset Para 6.17	In line with the above comments, Para 6.17 is also strongly supported by TfL Planning.
			Noted
3	TfL	Traffic & Pollution Para 6.7	<p>In response to Para 6.7's statement on community concern about the wide catchment areas of some local schools resulting in high volumes of traffic coming from outside the Plan Area, TfL Planning would point out that the catchment areas of schools are outside the remit of a neighbourhood plan. It may instead be worth highlighting the need for sustainable and active travel planning by local schools. The TfL schools travel planning programme, STARS, replaces 13 million miles' worth of car journeys each year with walking, cycling and scooting (see https://stars.tfl.gov.uk/). The Forum and Council should encourage local schools to sign up to the STARS scheme and promote sustainable and active travel amongst pupils and staff in order to achieve a Bronze, Silver or Gold STARS accreditation, as this would help to reduce car traffic in the plan area.</p> <p>Improvement of wayfinding signage by the introduction and expansion of Legible London (https://tfl.gov.uk/info-for/boroughs/legible-london) into the plan area could also help encourage more linked trips to schools on foot from local LU, Overground and bus stops/stations. Likewise the Neighbourhood Forum could support in the Plan improvements and extensions to the walking and cycling network in the area which would encourage local people to make the school runs on foot or cycle rather than by car.</p>
			<p>It should be noted that Paragraph 6.7 merely contains supporting rationale to set Policy TT1 in context, explain why traffic congestion and pollution is a major issue in the Plan area and why the congestion and pollution impact of a development needs to be fully assessed at application stage.</p> <p>STARS Scheme</p> <p>The Forum have concluded that whilst TfL's STARS scheme is an extremely useful initiative, its value is relevant to all schools, and not merely those making development applications, and so is more appropriately promoted through more broadly-based TfL and Camden programmes.</p> <p>Wayfinding Signage</p>

Ref	Origin	Subject	Comments
			<p>Hampstead’s attractiveness to visitors means that signage has already received attention, from both Camden Council and most recently the newly formed Business Improvement District. The absence of signage was not highlighted during community consultation as an issue in the Plan area and the provisions of the London and Local Plans regarding new signage are therefore felt adequate for the Neighbourhood’s needs. The Neighbourhood Design policies do however include specific provisions regarding the style and location of signage to ensure that it complements and does not detract from the heritage and architectural features of the local centres.</p> <p><u>Walking and Cycling Network</u></p> <p>Policies TT1, TT2 and TT4 of the Neighbourhood Plan contains specific policies designed to make walking and cycling within the Plan area more attractive. Paragraph 6.52 notes the community’s support for the Northern extension of TfL’s Cycle Hire Scheme to cover the Plan area.</p>
4	CAMDEN	Air Quality	<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 clarify that assessments will be sought in line with Camden Planning Guidance.</p>
			<p>Policy TT1 has been reviewed in the light of this recommendation. The policy makes clear that an AQA must be completed and should demonstrate that development (after mitigating measures have been implemented) will not have an adverse effect on air quality in the Plan area.</p> <p>Nevertheless, whilst paragraph 6.19 specifically refers applicants to Camden’s Planning Guidance for further information on Transport Assessments and other required documents, no similar advice is provided for Air Quality Assessments.</p> <p>The Forum would therefore suggest addition of the sentence “Guidance on Air Quality Assessments can be found in Camden’s Local Plan”.</p>
5	TfL	Application where there is no traffic impact.	<p>TfL Planning objects to Para 6.24’s clarification on additional motor vehicle use, stating that paragraph 1 of Policy TT1 will not apply if existing premises are refurbished or redeveloped in a way which does not increase motor vehicle use or pollution.</p> <p>Policy T6 (Car parking) of the draft new London Plan states clearly at part I that “Where sites are redeveloped, existing parking</p>

Ref	Origin	Subject	Comments
			<p>provision should be reduced to reflect the current approach and not be reprovided at previous levels where this exceeds the standards set out in this policy.”</p> <p>Therefore any refurbished or redeveloped premise will need to conform with new parking standards once the new London Plan is published (adopted), and also Camden Council’s own stringent local car free planning policy. In the vast majority of cases they must therefore provide no car parking once refurbished or redeveloped</p> <p>Furthermore, as all new developments in Camden will be car free for the foreseeable future, it is very difficult to argue that any will generate significant amounts of new car traffic. As a result, in order to reduce car traffic and travel in the plan area, a far more useful approach would be to consider filtered permeability, timed access, and car free zones around schools. Such measures would be more likely to encourage mode shift away from cars, as they would target existing residents and visitors to Hampstead who are causing the area’s current traffic problems, not new development which should not with the car free policy.</p>
			<p>The Forum support this comment, but note that the purpose of Policy TT1 is to promote sustainable development by ensuring that the impacts of each application on pollution and air quality are appropriately considered and (where appropriate) mitigated at the earliest possible stage.</p> <p>It is therefore directed at additional vehicle movements (particularly those of customers, visitors, and service vehicles) and it is not concerned with parking controls or car ownership, where the draft London and adopted Local plans contain clear guidance. The plan makes reference to the local schools, many of which have limited or no parking facilities, but which nevertheless generate considerable volumes of motor vehicle traffic in the Plan area.</p> <p>To avoid any inference that this policy relates to car ownership, the Forum would recommend that paragraph 6.24 is reworded as follows :- <i>“It should be noted that paragraph 1 of Policy TT1 is concerned with additional motor vehicle journeys and its objective is to prevent additional vehicle traffic and pollution. Therefore, if an existing premises are refurbished or redeveloped in a way which does not increase motor vehicle journeys or pollution then paragraph 1 of this Policy will not apply.”</i></p>

Ref	Origin	Subject	Comments
6	CAMDEN	Transport Assessments	<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 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”.</p> <p>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.</p> <p>The criterion creates a degree of confusion. Air Quality Assessments focus on pollution issues but TAs/TSs and DSMPs do not. The latter address number of vehicle movements/’trips’ and the impact of traffic on residential amenity</p>
			<p>Policy TT1 has been reviewed in the light of this recommendation.</p> <p><u>Relevant, Necessary & Material</u></p> <p>The purpose of Policy TT1 is to promote sustainable development by ensuring that the impacts of all developments on pollution are appropriately considered and mitigated at the earliest possible stage.</p> <p>As with any risk assessment process, it is only by considering and noting impacts in a structured way, without exceptions, that all parties can have confidence that the genuine impacts of a development have been fully considered.</p> <p>Assessing the impact of only certain developments, (whether by de minimis limits or otherwise) would complicate the process and increase the likelihood that significant impacts were left unrecognised.</p> <p>It would also make it impossible to assess the cumulative impact of development. NPPF paragraph 6.24 makes clear that in relation to air quality, “Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.” As number of small impacts can over time pose a significant threat, selective application of this Policy would make it impossible for the overall impact of development to be understood.</p>

Ref	Origin	Subject	Comments
			<p>Paragraph 6.20 makes clear that such assessments should be <i>proportionate</i> and in line with NPPF Paragraph 193 need only contain material which is relevant, necessary and material to the application in question.</p> <p>This approach is consistent with the implementation of Local Plan Policy 8.77 that “In order to help reduce air pollution and adhere to London planning policy, developments must demonstrate that they comply with Policy 7.14 of the London Plan (to be at least air quality neutral).”</p> <p>It should be noted that Policy TT1 originally included a ‘de minimis’ limit of ‘50 additional person trips per day’. This was however removed on 29th September on the recommendation of the Healthcheck examiner, who suggested that all developments generating vehicle traffic should come within the scope of this policy for the following reasons :-</p> <ol style="list-style-type: none"> 1. In view of the imperative to reduce pollution in the Plan area and 2. Because the Policy makes clear that the information requirements should be proportionate and not burdensome. <p><u>Transport Assessments</u></p> <p>The need for Transport Assessments (which is supported by TfL) arises from the unusually challenging nature of the road network in the Plan area, meaning that relatively small issues, such as an oversized delivery or construction vehicle can have disproportionately large impacts on the fabric of the surrounding area, on vehicle congestion (with resulting pollution impacts) and on the experience of visitors and residents. In the interests of simplicity, Policy TT1 therefore addresses both matters of Air Quality and Transport Impact together.</p>
7	TfL	Pre-application Stage	<p>Para 6.20’s statement that “Transport Assessments, Transport Statements and Delivery & Servicing Management Plans (DSMPs), while being essential planning tools, should not be burdensome and need only be proportionate to the scale of development” is accurate and accepted.</p> <p>However TfL Planning would add that it is best practice if the required content, scope and key issues to be covered by any such document are discussed and agreed at pre-application stage. This helps to avoid abortive work by applicants and planning officers, as well as the inclusion of unnecessary elements in TAs eventually submitted with planning applications or documents which require significant revision post submission.</p>

Ref	Origin	Subject	Comments
			The Forum concurs with this recommendation and previous versions of the draft Neighbourhood Plan included a paragraph encouraging developers to discuss and agree documents before an application is submitted. It was removed because it appeared to be a generic requirement, affecting all applications and was therefore not specific to the needs of the Plan area.
8	TfL	Monitoring Reports	TfL Planning requests Policy TT1 (Traffic Volumes and Vehicle Size (part B) is rewritten to specify that a TfL approved methodology should always be used for monitoring surveys, as we wish to create a London-wide mode shift database and the use of diverse inconsistent and sometimes self-reported survey methodologies across the capital currently hinders our efforts. Data sharing of travel plan monitoring survey results is essential for strategic planning purposes. This will have benefits to the Forum in creating a body of consistent data which can be used for planning and monitoring.
			<p>Policy TT1 has been reviewed in the light of this recommendation. While the Forum recognises the value of making mandatory the approach which TfL proposes, it is nevertheless mindful of NTPP guidance that neighbourhood plans should “shape and direct sustainable development in their area” rather than duplicate generic policies which are not neighbourhood-specific.</p> <p>As TfL’s recommendation applies to all travel plan monitoring across the London region, the Forum would propose that this guidance can more appropriately appear in the Local Plan.</p>
9	TfL	Servicing & Delivery Vehicles	<p>Para 6.13 is interesting feedback from the Forum and has been noted by TfL Planning in advance of publication of our own new TfL Transport Assessment guidance to accompany the new London Plan in 2018.</p> <p>The majority of issues highlighted as not required by Camden Council TA guidance are generally dealt with in Deliveries and Servicing Plans (DSPs), which the Council can secure by a planning condition discharged in consultation with relevant stakeholders and thereafter becoming enforceable by the local authority across the life of the development should the approved servicing approach and practices in the DSP not be followed.</p> <p>TfL guidance on DSPs is available here: http://content.tfl.gov.uk/deliveryandservicingplans.pdf</p>
			Noted
10	CAMDEN	Construction Management Plans	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

Ref	Origin	Subject	Comments
			<p>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.</p>
			<p><u>Relevant, Necessary and Material</u></p> <p>The purpose of Policy TT1 is to promote sustainable development by ensuring that the impacts of each development on pollution are appropriately considered and mitigated at the earliest possible stage.</p> <p>As with any risk assessment process, it is only by considering and noting impacts in a structured way, without exceptions, that all parties can have confidence that the genuine impacts of a development have been fully considered.</p> <p>Given the special challenges posed by the Plan area it is also important to understand of the <u>cumulative</u> impact of development in accordance with NPPF paragraph 120, which states that “planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.”</p> <p>Applying this policy selectively would make it impossible to assess the cumulative impact of development. In the context of the Plan area a number of small impacts can over time pose a significant threat, meaning that selective application, (whether by de minimis limits or otherwise) would complicate the process and increase the likelihood that significant impacts were left unrecognised.</p> <p>As indicated in the Plan, the specific features of a development or the area immediately surrounding a development site are not the sole considerations in assessing transport impact because additional vehicle traffic will necessarily have to move across other streets in the Plan Area (the vast majority of which are narrow and residential) in addition to the street on which development is taking place.</p> <p>Nevertheless, paragraph 6.25 makes clear that such Construction</p>

Ref	Origin	Subject	Comments
			<p>Management Plans should be proportionate and in line with NPPF Paragraph 193 need only contain material which is relevant, necessary and material to the application in question. Policy TT1 makes clear that an <i>outline</i> Construction Management Plan is also acceptable at an appropriate level of detail to allow a robust assessment of the impact of the proposal on air quality and levels of pollution in the Plan area.</p> <p><u>Pollution and Air Quality</u></p> <p>It should be noted that pollution is not limited to air quality and the NPPF defines pollution as <i>“anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.”</i></p> <p><u>Local Justification</u></p> <p>The draft neighbourhood plan includes specific local justification at paragraphs 6.3, 6.11, 6.12 which set out both the specific local issues and the degree to which these were raised during community engagement. A further document “Service and Construction Vehicles – Impact Assessment” is included in the Evidence Base.</p> <p>Forum considers that the formulation of construction management strategies at the earliest stage is an essential tool in promoting development by ensuring that the negative impacts of construction are appropriately considered and mitigated. The closure of East Heath Road in September 2016 as a result of development and the need for a local councillor to intervene to ensure it was partially re-opened is one example of an instance where lack of clarity at the application stage led to conflicting understandings and significant disruption to residents and to the local transport system.</p> <p><u>The Local Plan Context</u></p> <p>The adopted Camden Local Plan includes various provisions which indicate the strategic importance attached to the preparation of Construction Management Plans and the cumulative impact of development :-</p> <ul style="list-style-type: none"> ➤ Paragraph 6.13 states that Construction Management Plans <i>“may be sought for developments with poor or limited access on site, those which are accessed via narrow residential streets, and those that could cause significant disturbance due to their location. Paragraph 6.15 states that “there are many instances where smaller schemes can have very significant impacts, particularly within predominantly residential areas”.</i>

Ref	Origin	Subject	Comments
			<ul style="list-style-type: none"> ➤ Policy A1 states that the Council will “resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network” and indicates that Construction Management Plans may be considered in this context. ➤ Paragraph 11.32 notes that “development schemes can individually or cumulatively introduce a range of issues, requirements and impacts that may justify the use of planning obligations alongside the Camden Community Infrastructure Levy.” <p>Policy 6.3 of the adopted London Plan makes clear that “Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.”</p> <p>Policy T4 of the draft London Plan states “The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated”.</p>
11	TfL	Transport Assessments	Part C of the same policy is supported by TfL Planning. The Forum and Council may wish to add a link to the TfL Transport Assessment guidance website, where new guidance will be uploaded in 2018 to support the new London Plan (see https://tfl.gov.uk/info-for/urban-planning-and-construction/transportassessment-guidance).
			Noted
12	TfL	London Distributor Road A502	Para 6.27’s promotion of “Downgrading the A502 London Distributor Road given its unsuitability for heavy vehicles north of Hampstead village” is not supported by TfL Planning due to its important role as a bus route served by the 46, 268 and N5 services. It should be removed from the plan in conformity with current London Plan policy 6.7 (Better Streets and Surface Transport).
			<p>The above recommendation proposes that the A502 should continue to be classified as a major road because three day-time and one night-time bus routes run along it. It should be noted that only one day-time bus route runs along the most narrow stretch of the A502 Heath Street to the North of Hampstead Underground Station.</p> <p>In considering this recommendation, the Forum have taken into account</p>

Ref	Origin	Subject	Comments
			<p data-bbox="639 282 655 304">:-</p> <ul style="list-style-type: none"> <li data-bbox="639 344 1428 450">➤ that there is no specific dependency between bus routes and major roads, with many buses running along streets which are not classified as 'A' roads or distributor roads. <li data-bbox="639 490 1428 595">➤ that roads are classified based on their physical capacity to support volumes of traffic (and the impact of traffic) rather than by reference to bus routes. <li data-bbox="639 636 1428 846">➤ the extreme narrowness of the A502 (Heath Street), North of Hampstead Underground Station and the significant issues which this creates for delivery vehicles and buses, which are documented in the Plan and in the additional document "Service and Construction Vehicules – Impact Assessment" which can be found in the Evidence Base. <li data-bbox="639 887 1428 1032">➤ designation of this road as an 'A' road and a distributor road means that satellite navigation systems currently direct through traffic along it in volumes which are not sustainable given the narrow width of both the road and adjoining pavements. <li data-bbox="639 1072 1428 1178">➤ the impossibility of road widening or other measures given the density of surrounding buildings and the impact on the area's heritage. <p data-bbox="639 1218 1428 1386">In these circumstances, the Forum have concluded that removing the designation of this road as a major thoroughfare (distributor road) will contribute to London Plan Policy 6.7, by reducing the flow of private vehicles and lorries along this highly congested route, so promoting bus transit and thereby encouraging more active forms of travel.</p>

Policy TT2 - Pedestrian Environments

Ref	Origin	Subject	Comments
13	TfL	Policy TT2	Policy TT2 (Pedestrian Environments) is strongly supported by TfL in conformity with the Healthy Streets Approach promoted in the new draft London Plan (see policies GG3 and T2) and also policy 7.5 (Public Realm) of the current London Plan.
			Noted.
14	CAMDEN	Speed Limits	Recommend that reference to speed limits is removed from the policy. Planning policies cannot deal with speed limits as this is covered by other legislation.
			<p>The Forum have reviewed Policy TT2 in the light of this recommendation, but have concluded that limitation of vehicle speeds is an essential factor both in reducing the dominance of motor vehicles and enabling other neighbourhood specific policies including those dealing with crossing types. A speed limit above 20 mph would lead to a very different street environment in the Plan area which in the view of the Forum would significantly impair delivery of the Plan's objectives.</p> <p>The Forum notes that reducing the dominance of motor vehicles is a requirement of both the adopted Local Plan and the London Plan and that a reduction in vehicle speed is regarded as a key driver towards this objective. By way of example, Policy GG3 of the draft London Plan requires local planning authorities to <i>"use the Healthy Streets Approach to prioritise health in all planning decisions."</i> TfL's document "Healthy Streets for London" states :-</p> <ul style="list-style-type: none"> ➤ <i>"We can enhance our streets with seating, shade and greenery, and reduce the dominance of vehicles by designing for slower vehicle speeds."</i> ➤ <i>"A successful transport system encourages and enables more people to walk and cycle more often. This will only happen if we reduce the volume and dominance of motor traffic and improve the experience of being on our streets."</i> <p>TfL's sixth Healthy Street Indicator states <i>"Making streets easier to cross is important to encourage more walking and to connect"</i></p>

Ref	Origin	Subject	Comments
			<p><i>communities. People prefer direct routes and being able to cross streets at their convenience. Physical barriers and fast moving or heavy traffic can make streets difficult to cross."</i></p> <p>Having carefully considered the most appropriate public realm measures which can support the Plan's objectives the Forum considers that those listed in Policy TT2 offer the best way of shaping and directing the strategic policies set out in the London Plan and Local Plan in the context of the Neighbourhood and are in close conformity with TfL's Healthy Streets Approach.</p>
15	TfL	Traffic Modelling and Safety	<p>Paras 6.34 and 6.35 on Zebra crossings are tentatively supported by TfL Planning to encourage more walking.</p> <p>However it is important to emphasise that any new pedestrian crossings introduced in the plan area must be subject to traffic modelling analysis to ensure they do not create unacceptable levels of bus journey time delay. Therefore TfL may oppose specific zebra crossing proposals on a case by case basis depending on local streetscape and traffic conditions, and operational requirements for the ongoing efficient, economical and effective management of the public transport network to serve Londoners and as a key element of sustainable and active travel to support public transport, walking and cycling and encourage mode shift from the car.</p>
			<p>The Forum recognise that it is implicit in both the Local Plan, London Plan and Neighbourhood Plan (and in TfL's own Healthy Streets Approach) that their purpose is to shape development and that the judgement made by traffic planners will always have regard to both individual circumstances and national standards of safety and visibility.</p>
16	CAMDEN	Need and Viability	<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>

Ref	Origin	Subject	Comments
			<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>
			<p>The Forum have reviewed Policy TT2 in the light of this recommendation.</p> <p><u>Need</u></p> <p>The Forum took particular note that the objectives of both the London Plan and Local Plan are to promote sustainable transport choices by prioritising the needs of walkers, cyclists and users of public transport :-</p> <ul style="list-style-type: none"> ➤ Local Plan Policy T1 states that “In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments improve the pedestrian environment by supporting high quality public realm improvement works” ➤ Policy T2 of the draft London Plan states that Development proposals should: 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. 2) reduce the dominance of vehicles on London’s streets whether stationary or moving. 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.. ➤ Policy 6.10 of the current London Plan states that “Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space” ➤ Policy D7 of the draft London Plan states that pedestrian crossings should be “regular, convenient and accessible” and that

Ref	Origin	Subject	Comments
			<p>“Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.”</p> <p>Over time the inevitable outcome of these policies will be to promote more pedestrian-friendly environments including better provision of pedestrian crossings.</p> <p>The Forum have therefore carefully considered the most appropriate public realm measures which can support these objectives and consider that those listed in Policy TT2 are those which offer the best means of supporting these objectives of the London and Local Plans in the context of the Plan area.</p> <p><u>NPPF Paragraph 204</u></p> <p>The preamble and text of Policy TT2 makes clear that it applies merely to public realm improvement works which are associated with development. It does not require public realm improvements to be performed in order for each development proposal to proceed and therefore is not in conflict with NPPF paragraph 204.</p> <p>For the avoidance of doubt, the Forum would recommend that the wording “associated with Development” is amended to “resulting from Development”</p> <p><u>Tension between Safety and Aesthetic Appeal</u></p> <p>The Plan refers to evidence that the type of zebra crossings already employed in the Plan area (and those which are most suited to it) offer safety benefits, particularly in view of the 20 mph speed limit which now covers the Plan area. The supporting documents are included in the Evidence Base.</p> <p>Having reviewed the Neighbourhood priorities listed in Policy TT2 the Forum have concluded that these are in close conformity with the objectives of the Local Plan, the draft London Plan and TfL’s Healthy Streets Approach.</p> <p>It is nevertheless implicit in all these plans that their purpose is to provide guidance and that the judgement made by traffic planners will also have regard to individual circumstances and national standards of safety and visibility.</p> <p><u>Mindfulness</u></p>

Ref	Origin	Subject	Comments
			<p>The use of the term 'mindful' is supported by paragraph 6.24 of the Neighbourhood Plan, which explains how the use of crossing points which do not rely on traffic lights improves the interaction between road users. This is in alignment with Camden's Naked Streets principle, set out in its 2011 Transport Strategy, which states <i>"The absence of signs and signals therefore compels people to pay more attention to what other people are doing: as behaviour is often unpredictable, this requires everyone to be more vigilant of what is happening around them and move with caution. This results in lower traffic speeds and a safer and more pedestrian friendly environment."</i></p> <p>This conclusion is supported by the Forum's own survey of pedestrian crossings at South End Green, conducted on 17th May 2017, which found that in over 50% of cases, pedestrians acknowledged drivers when crossing.</p>
17	CAMDEN	Street Clutter	<p>Recommend that the criterion is reworded to aid implementation. It should be focussed on minimizing 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>Policy TT2 has been reviewed in the light of this recommendation.</p> <p>This policy does is not limited to pavement clutter, which is dealt with separate in Policy DH3 of the Neighbourhood Plan (Urban Realm).</p> <p>It also focuses on those road transport measures which if poorly planned can have a material effect on both the pedestrian and visitor experience in the Plan area by creating a more congested or more complex street environment. In doing so its objective is to apply the strategic objectives set out in the London Plan and Local Plan to the specific challenges of the Plan area and the desires of the community.</p> <p>To this end paragraph 6.33 makes it clear that where it is necessary to consider additional traffic calming measures, deployment of additional crossing points and enforcement of the 20mph speed limit should be considered as a first-line measure in preference to the use of barriers, signs, furniture and segregation. This is consistent with the three 'shared space principles' set out in Policy 6.10 of the current London Plan <i>"promoting simplified streetscape, decluttering and access for all"</i>.</p> <p>TFL's sixth Healthy Street Indicator also states <i>"Making streets easier to cross is important to encourage more walking and to connect</i></p>

Ref	Origin	Subject	Comments
			<p>communities. People prefer direct routes and being able to cross streets at their convenience. Physical barriers and fast moving or heavy traffic can make streets difficult to cross.” Paragraph 10.2.7 of the draft London Plan states that “New developments and public realm schemes should deliver improvements against the Healthy Streets Indicators”</p> <p>The policy nevertheless states that this relates to “unnecessary” measures and therefore measures which have an over-riding safety or traffic management justification, are perfectly acceptable.</p>
18	CAMDEN	“Charm”	<p>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</p>
			<p>Policy TT2 has been reviewed in the light of this recommendation.</p> <p>While ‘charm’ cannot be calibrated, the Forum notes that under Policy TT2 public realm improvements merely need to be “consistent with the objective” to “complement the character and charm of the areas’s streets, pavements and sightlines”. The Forum’s research indicates that this objective is consistent with the Local Plan, which indicates that “charm” is a material consideration.</p> <p>Paragraph 6.7 of the Camden Local Plan states <i>“The overall quality of a building is also a consideration as buildings with character and charm are more likely to be retained and adapted.”</i></p> <p>Policy D1 of the Camden Local Plan states that development designs should “comprises details and materials that are of high quality and complement the local character”.</p> <p>Given the widespread recognition of the specific features of the Hampstead area, the Forum have concluded that the objectives of Policy TT2 are readily understood and its current wording is consistent with the strategic objectives of the Local Plan.</p>
19	CAMDEN	Viability	<p>Recommend that the criterion should be subject to the needs generated by a scheme and viability. It will only be appropriate to secure these measures for certain developments, i.e. where sufficient need arises from the proposed scheme. The approach</p>

Ref	Origin	Subject	Comments
			<p>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>NPPF Paragraphs 173 and 204</p> <p>The preamble and text of Policy TT2 makes clear that it applies merely to guide the design of agreed public realm improvement works which are associated with development. It does not require public realm improvements to be performed in order for each development proposal to proceed and therefore is not in conflict with NPPF paragraphs 173 or 204.</p> <p>It is noted that both the London Plan and Local Plan both include clear indicators (either directly or in their supporting guidance) regarding the design and layout of streets and other matters relating to the public realm.</p> <p>For the avoidance of doubt, the Forum would recommend that the wording “associated with Development” is amended to “resulting from Development”</p>
20	TfL	Shared Use	<p>Para 6.36 on community support for a potential “Shared Use Road Scheme” at South End Green is noted by TfL Planning. For inspiration, the Forum may wish to consult Sections 3.3 (Enhancing a Cultural Heart), 3.4</p> <p>(Changing the purpose of a street) and 3.5 (Rebalancing user needs) of the TfL Streetscape Guidance (available from https://tfl.gov.uk/corporate/publications-and-reports/streets-tookit), which include case studies that are particularly relevant to the local context. Also, Better Streets Delivered 2, a collection of case studies recently published by TfL & Urban Design London (https://tfl.gov.uk/cdn/static/cms/documents/better-streets-delivered-2.pdf), in particular the Bexleyheath Town Centre case study (p. 48).</p> <p>As with new pedestrian crossings, TfL reminds the Council and Forum that bus operations must not be worsened by any new streetscape proposals in the plan area. Furthermore any proposed changes to the local street environment must accord with the new TfL Healthy Streets approach and be subject to the recently published Healthy Streets Check for Designers (see</p>

Ref	Origin	Subject	Comments
			<p>https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets).</p>
			<p>The Forum note this comment. Having reviewed the Neighbourhood priorities listed in Policy TT2 the Forum have concluded that these do achieve the objective of shaping and directing the strategic policies set out in the London Plan and Local Plan in the context of the Neighbourhood and are in close conformity with Tfl's Healthy Streets Approach.</p> <p>It is nevertheless implicit in all these plans that their purpose is to provide guidance and that the judgement made by traffic planners will always have regard to both individual circumstances and national standards of safety and visibility.</p>

Policy TT3 – Public Transport

Ref	Origin	Subject	Comments
21	TfL	Need	<p>Finally, para 6.39 notes the percentage of people in Hampstead Town ward living in areas with a PTAL score of 3 or less is 70% of the total population, compared to only 29% across the borough as a whole and describes Hampstead ward's PTAL as "a relatively low PTAL score at 4.0". It is worth stressing to the Forum and Council here that TfL opposes the characterisation in the document of a PTAL 4 as low, this PTAL has always been described as good and furthermore the new draft London Plan policy is for housing to be delivered at optimum densities in close proximity to stations and town centres, including areas of PTALs 3- 6 (see Policy D6 on Optimising Housing Density, and also Policy GG2 on Making Best Use Of Land). We would therefore be interested to understand from the Forum what proportionate of Hampstead residents live in areas of PTAL 0-2, as referring to the percentage in PTAL '3 or less' may have given a false impression that 70% of local people live in areas of low public transport accessibility when in fact the majority do not.</p>
			<p>In seeking how best to promote sustainable development, the Forum first took into account the relatively poor transport provision over the Plan area as a whole of 4.0 compared with a Borough average of 5.6</p> <p><u>Relative Public Transport Provision</u></p> <p>To explore the reasons for this discrepancy , the Forum compared the low connectivity in the wards of Hampstead Town and Gospel Oak (which form the Plan area) compared with those of adjoining and nearby wards which have equivalent urban characteristic, using the analysis of PTAL values by Borough and Ward produced by TfL in 2014.</p> <p>In Gospel Oak and Hampstead Town wards, 69% and 70% respectively of the population live at locations which have the lowest PTAL accessibility scores of 0 to 3. This compares with :-</p> <ul style="list-style-type: none"> ➤ 40% Frogna & Fitzjohns ward. ➤ 48% in Haverstock ward. ➤ 10% in Swiss Cottage ward ➤ 51% in Mapesbury ward (Brent) ➤ 13% in Kilburn ward. ➤ 2% in West Hampstead ward. <p>In Gospel Oak and Hampstead Town wards, 21% and 24% respectively of</p>

Ref	Origin	Subject	Comments
			<p>the population live at locations which have PTAL accessibility scores of below 3. This compares with :-</p> <ul style="list-style-type: none"> ➤ 24% Frogna & Fitzjohns ward. ➤ 12% in Haverstock ward. ➤ 7% in Swiss Cottage ward ➤ 16% in Mapesbury ward (Brent) ➤ 10% in Kilburn ward. ➤ 0% in West Hampstead ward. <p>The Forum have concluded that relatively poor public transport accessibility places the neighbourhood at a disadvantage in making development sustainable and achieving the mode shift in travel envisaged by the London Plan, both of which will require significant improvements in access to public transport over time.</p> <p><u>Desired Level of Public Transport Accessibility in the Plan Area</u></p> <p>In assessing an appropriate minimum public transport accessibility level for developments with a transport impact in the plan area, the Forum has taken into account Camden’s policy T2 that all future developments should be car-free.</p> <p>Policy T6.1 of the emerging London Plan associates car-free developments in Inner London with locations having a PTAL rating of 4 or above. Whilst there is no bar on more restrictive policies, there is a clear understanding that car-free development cannot be mandated at a London level at locations whose PTAL assessment is below 4.</p> <p>Paragraph 6A8 of the adopted London Plan likewise makes clear that the level of PTAL for which car-free development is supported is 4 or upwards. Despite the drive to introduce car-free development, the draft London Plan accepts that car parking may be provided at locations with a PTAL score of 3, because public transport provision is not deemed sufficient in those locations.</p> <p>The Forum therefore recognise that delivering on the objectives of the Local Plan and London Plan to drive down car usage will inevitably require improvement to public transport in the context of the Plan area.</p> <p>Given the critical importance of improving air quality in the Plan area, the Forum has concluded that a PTAL level of 5 should be the future objective for sites involving schools, healthcare premises and sites generating significant movement flows. Adequate transport connectivity is especially important in the case of children and vulnerable adults</p>

Ref	Origin	Subject	Comments
			<p>including the elderly.</p> <p>Policy 6.3 of the adopted London Plan states that “<i>where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met.</i>”</p> <p>The Neighbourhood Plan has been designed to follow the draft Local Plan in providing clear definitions, which can support development. To this end clear statements on matters such as public transport access, vehicle weights and development size have been included to indicate where transport policies should and should not apply in the Plan area.</p> <p>Nevertheless, given the current state of provision, the Forum recognises that some form of transitional arrangement may be necessary, which may involve setting two levels of PTAL :-</p> <ul style="list-style-type: none"> ➤ 4 for the first 5 years of the Plan to 2023 ➤ 5 for the remainder of the Plan’s lifespan. <p>To address the recommendations from both TfL and Camden an additional paragraph, matching the approach taken by Policy 3.30 of the existing London Plan would be supported as follows : “Where transport assessments <u>other than PTALs</u> can reasonably demonstrate that a site has either good existing or planned public transport connectivity capacity, and subject to the wider concerns of this policy” then an exception can be permitted.</p> <p>Due to the critical importance which shifting users to public transport has in promoting reduced vehicle usage, the responsibility should always be on the developer and public transport authority to justify why an exception should be made.</p>
22	TfL	Need	<p>Para 6.6 part B states: “b. A public transport accessibility level (PTAL) score over 5 (slightly below the borough average of 5.6) is defined as the minimum level for the sites of large developments, schools and educational institutions in the Plan Area.”</p> <p>TfL Planning objects to this policy as it would not conform with the new London Plan nor the development plan for the area (the 2015 London Plan and the Camden Local Plan) , in particular West Hampstead’s classification in Table A1.1 as having ‘Medium’ residential growth potential. Furthermore, PTAL does not take into account public transport accessible within short cycling distances (</p>

Ref	Origin	Subject	Comments
			<p>as well as walking) or any journeys made solely by walking or cycling. The policy put forward would effectively prevent large scale development, schools and educational institutions across the plan area without significant investment in new bus, rail or LU services. It is therefore too restrictive given the new Mayoral emphasis on promoting development within 800m of stations and town centres and more generally in inner London boroughs such as Camden, to help tackle London's acute housing need and to enable necessary infrastructure such as schools to be provided to serve local communities.</p> <p>The mean averaging of PTAL across a wide area such as Hampstead or Camden is also fundamentally flawed, as the PTAL calculation methodology relies on walk access thresholds which differ from point to point across geographic space. As a result, suggesting that a borough has an 'average' PTAL does not make sense.</p> <p>TfL Planning considers this policy does not conform with the current London Plan, NPPF or Camden's local plan, as it fails to take account of Camden's site allocations, the NPPF definition of sustainable development (for which there is a presumption in favour) and the housing supply and density policies of the current London Plan (see policies 3.4, 3.7, and Table 3.2).</p>
			<p>In the light of these recommendations, the Forum has conducted a further assessment to ensure that the use of the PTAL tool is consistent with the provisions of the London Plan (including the draft London Plan dated December 2017), the adopted Camden Local Plan (2017) and the NPPF.</p> <p>All Neighbourhood Development Policies TT1 to TT4 have also been reviewed in the light of these comments to ensure they are in general conformity with the emerging London Plan (draft dated December 2017). Please refer to separate reference table.</p> <p>The comments from TfL cast doubt on the use of PTAL in Neighbourhood Policy TT3 on a number of grounds :-</p> <ul style="list-style-type: none"> ➤ It use does not conform with the London Plan or Camden Local Plan ➤ West Hampstead is defined as having 'Medium' growth potential ➤ It would require investment in public transport ➤ PTAL does not take into account walking or cycling ➤ The Mayor's policy is to support developments within 800 metres of

Ref	Origin	Subject	Comments
			<p>railway stations</p> <ul style="list-style-type: none"> ➤ The policy attempts to ‘average’ PTAL scores over a wide area ➤ The policy conflicts with the NPPF’s presumption in favour of sustainable development ➤ The policy conflicts with the London Plan’s housing density and supply policies. <p>The Forum recognise the challenge posed by the specific needs of the Plan area, which is that achievement of critically important reductions in levels of air pollution to meet the Mayor’s objectives and to support Camden’s policy of car-free development will require improvements in public transport provision in the Plan area.</p> <p>The dynamic dealt with by this policy is that sustainable development can only be achieved if decisions on the location of sites generating transport demands are sensitive to existing public transport provision, so that new car journeys are not encouraged. Sustainable development also requires that where possible developers and transport planners are encouraged to work together to promote the elevation of public transport accessibility in the Plan area.</p> <p><u>The London Plan and Camden Local Plan</u></p> <p>Having reviewed the London Plan (both current and draft) the Forum is satisfied both that widespread use is made of the PTAL accessibility measure on both a ‘blanket’ and site-specific basis and that further use of this measure in Local and Neighbourhood plans is supported.</p> <ul style="list-style-type: none"> ➤ Both the current and draft London Plans already employ clear rules involving PTAL levels to determine various London-wide planning matters including housing densities and parking provisions. ➤ Paragraph 6.43 of the current London Plan (2016) states :- <i>“Public Transport Accessibility Levels (PTALs) are used by TfL to produce a consistent London wide public transport access mapping facility to help boroughs with locational planning and assessment of appropriate parking provision by measuring broad public transport accessibility levels. There is evidence that car use reduces as access to public transport (as measured by PTALs) increases.”</i> ➤ TFL’s supporting document “Assessing Transport Connectivity in London” states <i>“The use of PTAL is now deeply embedded in strategic and local planning.”</i> (2.3) and states that an assessment of connectivity such as PTAL may be used among other purposes <i>“to identify for the most suitable locations for medical and other services, so that people can reach them easily”</i> (1).

Ref	Origin	Subject	Comments
			<p><u>West Hampstead</u></p> <ul style="list-style-type: none"> ➤ Whilst the current London Plan (March 2016) refers to the West Hampstead Interchange as a “Intensification Area”, this is some distance from the Plan area and is not referred to in the Neighbourhood Plan. <p><u>Investment in Public Transport</u></p> <ul style="list-style-type: none"> ➤ As TfL have commented, large scale developments and the launch of new schools or educational institutions in the Plan area would require public transport investment, although it does not follow that this need be significant. ➤ TfL’s own PTAL calculator demonstrates that quite simple and cost-effective improvements, by re-siting bus stops or increasing the frequency of bus services can significantly raise a location’s PTAL score. ➤ The limited accessibility of public transport in some parts of the Plan area, the specific problems of pollution, chronic traffic problems and significant concerns over the transport impact of local schools do require that new schools and large developments are located at sustainable sites where public transport provision is appropriate. <p><u>PTAL Does not take into account Walking or Cycling</u></p> <ul style="list-style-type: none"> ➤ TFL’s document “Assessing Transport Connectivity in London” makes clear that the PTAL measure is designed to evaluate the accessibility of <u>public</u> transport, and its standard calculation uses a walking time to the nearest public transport sites. ➤ Its purpose is to offer a simple, consistent measure by which the accessibility by public transport of different sites can be compared with one another and with local or regional objectives. ➤ The Forum have concluded that the use of walking rather than cycling in the PTAL calculation model does not affect its ability to offer a consistent measure of public transport accessibility, as deployed in the London Plan. <p><u>Development within 800 metres of stations</u></p> <ul style="list-style-type: none"> ➤ Policy H1 of the draft London Plan prioritises housing development in sites with a PTAL score of 3 or above, which are within 800 metres or a railway station and a town centre boundary. ➤ Neighbourhood Policy TT3 is directed primarily at non-residential developments which have transport impacts and it therefore covers educational and healthcare sites and those generating more than 100 additional person trips each day. In practice, it is most unlikely that any incremental residential development in the Plan area could generate this number of additional trips, but to ensure compliance, the Forum would support amendment of Policy TT3 so as to limit it

Ref	Origin	Subject	Comments
			<p data-bbox="655 277 1038 309">to 'non-residential' developments.</p> <p data-bbox="603 376 1082 407"><u>The Policy attempts to Average PTAL scores</u></p> <ul data-bbox="603 427 1406 1099" style="list-style-type: none"> <li data-bbox="603 427 1406 495">➤ The forum notes that PTAL measures are used in the draft London Plan in both area-wide and site specific contexts. <li data-bbox="603 510 1406 645">➤ While the introduction to Neighbourhood Policy TT3 refers to Camden's overall PTAL score, it is made clear that the PTAL measure in the context of the Plan area is to be used for site-specific calculations only. <li data-bbox="603 660 1406 920">➤ A key benefit of PTAL is that its value can be quickly established for an individual address on the basis of publicly available information and without the need for automated tools. TfL's "Assessing Transport Connectivity in London" document provides simple rules which enable the benefits of proposed changes in public transport (for example the relocation of a bus stop) to be quantified in a simple and objective way. The same document sets out the calculation mechanism for an individual location. <li data-bbox="603 936 1406 1099">➤ To this end, the Forum has concluded TfL's PTAL calculation to be a cost-effective means of assessing public transport accessibility in connection with development proposals in view of its maturity, the simplicity of its calculation and the wide availability of calculation tools. <p data-bbox="603 1122 890 1153"><u>Sustainable Development</u></p> <ul data-bbox="603 1182 1406 1917" style="list-style-type: none"> <li data-bbox="603 1182 1406 1317">➤ As stated in the draft Neighbourhood Plan, the Forum considers that clear definitions and policies can play an important role in promoting sustainable development by giving both developers and the community the confidence to make appropriate decisions. <li data-bbox="603 1332 1406 1917">➤ The Forum notes a number of policies of the emerging London Plan are intended to encourage planners to seek improvements in public transport to promote sustainable development and contribute to the achievement of government and EU targets on the reduction in levels of pollution. These include: <ul data-bbox="667 1518 1406 1917" style="list-style-type: none"> <li data-bbox="667 1518 1406 1704">○ Policy GC2 (E) requires planning authorities to <i>"Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links."</i> <li data-bbox="667 1727 1406 1917">○ Policy D6 requires that : <i>"The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including</i>

Ref	Origin	Subject	Comments
			<p><i>the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time.”</i></p> <ul style="list-style-type: none"> ○ Policies S1, S2 and S3 states that new social infrastructure, health, education and childcare facilities should be <i>“easily accessible by public transport, cycling and walking.”</i> ○ Policy T1 states that <i>“Development Plans and development proposals should support: the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.”</i> ○ Policy T2 states that <i>“Development Plans should: “Development proposals should:”be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.”</i> ○ Policy T4 states that development proposals should <i>“reflect and be integrated with current and planned transport access, capacity and connectivity”. “Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified”.</i> ○ Policy T9 states that <i>“Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach”</i> ○ Policy SD10 requires development proposals to <i>“contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area.”</i> <p>➤ The Forum also notes NPPF Policies which require development to take into account the availability of public transport provision.</p> <ul style="list-style-type: none"> ○ Policy 35 requires that <i>“developments should be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities.”</i> ○ Policy 8 states <i>“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions”</i>

Ref	Origin	Subject	Comments
			<p>Housing Density and Supply Policies</p> <p>➤ Neighbourhood Policy TT3 is directed primarily at non-residential developments which have transport impacts and it therefore covers educational and healthcare sites and those generating more than 100 additional person trips each day. In practice, it is most unlikely that any incremental residential development in the Plan area could generate this number of additional trips, but to ensure compliance, the Forum would support amendment of Policy TT3 so as to limit it to 'non-residential' developments.</p>
23	CAMDEN	Medical/ Education Sites	<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 consider it is well served by public transport.</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 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>
			<p>PTAL Levels cannot be accurately predicted for every site/premises</p> <p>The Forum notes that the Plan's use of PTAL is consistent with both the adopted and draft London Plans, which indicate that PTAL can be used both to characterise the public transport provision of an area and as a <i>planning tool</i> to indicate the public transport connectivity of an individual</p>

Ref	Origin	Subject	Comments
			<p>site.</p> <p>In particular :-</p> <ul style="list-style-type: none"> ➤ Policy D6 of the draft London Plan states <i>“The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given toits connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL).”</i> ➤ Paragraph 10.6.3 of the draft London Plan states <i>“When calculating general parking provision within the relevant standards, the starting point for discussions should be the highest existing or planned PTAL at the site.”</i> ➤ Paragraph 6A8 of the adopted London Plan states <i>“In locations with a PTAL of 4 –6, onsite provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing.</i> <p>The London Plan is supported by TFL’s document “Assessing Transport Connectivity in London” which sets out the calculation method to find the PTAL value of any individual site, but also states that simply checking a PTAL value using its online tool is “suitable for most applications”. The method to calculate PTAL for an individual site is simple to follow and does not depend upon the use of online tools or third-parties.</p> <p><u>The Policy is overly onerous in relation to medical uses and care homes</u></p> <p>As set out in the Plan, the Forum considers it essential that the Plan encourages improvements in public transport in the Plan area and in particular directs the establishment of healthcare and educational facilities towards sites which are well connected to public transport systems. This is for five reasons :-</p> <ul style="list-style-type: none"> ➤ To promote the car-free policies of the London and Local Plans and avoid any increase in vehicle journeys in the Plan area. ➤ Because these sites are visited by higher numbers of elderly and young people who would not be able to access them easily in the absence of public transport ➤ Because it is particularly important that sites visited by children and vulnerable adults are well connected and are not isolated. In particular it is important that these sites are not located in isolated

Ref	Origin	Subject	Comments
			<p>places, but in safe environments where there are regular passers by.</p> <ul style="list-style-type: none"> ➤ To reflect the widespread concern raised during community engagement about sites which attract traffic, particularly schools. ➤ To encourage the location of such sites near to or in existing neighbourhood centres, which have acceptable public transport access in order to sustain the economic vitality of those centres. <p>In achieving the objective of promoting and directing sustainable development, the Plan accepts the need to positively improve the conditions by which people travel in the Plan area.</p> <p>Nevertheless, given the current state of provision, the Forum recognises that some form of transitional arrangement may be required, as set out in its response to Comment 21 above.</p> <p>The effect of a transitional arrangement would be to cover a much larger part of the Plan area, including locations with better access to bus routes.</p>
24	TfL	Significant Transport Impact	<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>
			<p>In setting the threshold above which adequate public transport accessibility must be provided, the Plan refers to the fact that that 100 person trips per day is a significant number in the context of the Plan area and is equivalent to the total number of trips generated by a large (2 practioner) dental surgery.</p> <p>For the reasons set out in response to other comments, the Forum</p>

Ref	Origin	Subject	Comments
			<p>considers it is appropriate for the Plan to help shape and improve the local area by directing those sites towards those locations where public transport is acceptable.</p> <p>Nevertheless, given the current state of provision, the Forum recognises that some form of transitional arrangement may be required, as set out in its response to Comment 21 above.</p> <p>The effect of a transitional arrangement would be to cover a much larger part of the Plan area, including locations with better access to bus routes.</p>
25	CAMDEN	Viability	<p>Recommend that the criterion is reworded as it 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.</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 lower PTAL levels may be prohibitive and therefore, Criterion 2 is unlikely to be effective.</p> <p>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.</p>
			<p>NPPF 73 and 204</p> <p>It is important to note that the objective of policy TT3, as stated, is to positively plan for and shape sustainable development in the context of the Plan area by driving sites which have a significant transport considerations towards locations which are well served by public transport.</p> <p>This policy does not require developers to make contributions towards public transport.</p> <p>It does promote development by offering an exception, enabling new sites, previously ignored, to be considered for development in circumstances where existing unacceptable public transport access can be improved.</p> <p>In line with TfL’s guidance, the Plan recognises that in many cases quite small and inexpensive improvements, such as the relocation of a bus stop</p>

Ref	Origin	Subject	Comments
			<p>or an improvement in a bus service can have a significant impact in elevating a location's public transport accessibility.</p> <p>For this reason, the Forum considers that the Plan is consistent with NPPF policies 73 and 204, whilst recognising the importance of finding creative solutions which drive sustainable development as set out in Core Planning Principle 17.</p> <p>The Forum note that this approach is consistent with the various provisions contained in the London Plan, whose purpose is similarly to drive certain types of development towards locations with good public transport access.</p>

Policy TT4 – Cycle and Car Ownership

Ref	Origin	Subject	Comments
26	CAMD EN	Cycle & Car Ownership Policy TT4	<p>Recommend that references to “apartments” is replaced by residential development.</p> <p>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.</p> <p>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.</p> <p>“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.</p> <p>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.</p> <p>The full details are set out in paragraph 9.8.</p> <p>Recommend that the policy is brought into line with the London Plan to ensure that there is no under-provision of cycle parking.</p> <p>The approach has the effect of simplifying the 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 short stay and long stay cycle parking spaces, which means that together the overall number of spaces sought may be greater</p>

Ref	Origin	Subject	Comments
			<p>than the Neighbourhood Plan requires.</p>
			<p>Policy TT3 has been reviewed in the light of this recommendation.</p> <p><u>Apartments</u></p> <p>The Forum notes that the London and Local plans already contain clear minimum requirements for cycle parking in all residential developments.</p> <p>The Forum have therefore restricted its remit to consider how the strategic objectives of these plans should be applied to direct sustainable development in the Plan area.</p> <p>In this context, the Forum considers that the system of roads and design requirements covering large parts of the Plan area means that opportunities for on-road provision of residential cycle parking are severely restricted.</p> <p>This constraint is especially relevant to the design of apartment blocks or houses converted into apartments, which result in multiple dwellings, each with their own parking needs, located on a single site.</p> <p>In these circumstances, Policy TT4 is limited to ensuring that developers carefully integrate cycle parking ways into the design of apartments so as to maximise the use of sustainable transport in the Plan area.</p> <p><u>Exceptions</u></p> <p>The policy already makes clear that this policy only applies to the extent that it can be achieved “in a manner both viable and sympathetic to the character of the surrounding area”.</p> <p>The Forum consider this approach sets clear objectives while ensuring that the responsibility is on the developer to justify why an exception should be made.</p> <p><u>Too Restrictive</u></p> <p>The Forum notes that in the context of the adopted Local Plan:-</p> <ul style="list-style-type: none"> ➤ Policy T1 (h) states that the Council will seek to ensure that developments provide cycle parking which is in accordance with its Supplementary Planning Guidance on Transport

Ref	Origin	Subject	Comments
			<p>➤ Paragraph 9.8 of Camden’s Supplementary Planning Guidance 7 (Transport) sets out requirements for residential off-street cycle parking in the form of a table which states that :-</p> <ul style="list-style-type: none"> ○ Parking for residents should be within the building ○ The route to cycle parking from street level should be step-free <p>The Local Plan also requires developers to adhere to the cycle parking policies of the London Plan, which in turn requires that cycle parking in residential developments should comply with the London Cycling Design Standards :-</p> <p>➤ Paragraph 8.3.1 of these standards state that “long-stay parking is best located in a building”.</p> <p>➤ Paragraph 8.2.1 states that “where cycle parking is inside a building, it should have step-free access, wide doorways and spacious corridors.”</p> <p>The Forum recognises that these provisions, while very important in the context of the Plan area are contained in supplementary documents which may not always be consulted. In these circumstances, it has concluded that it is appropriate to highlight these requirements in the Neighbourhood Plan to ensure that they are not overlooked in the context of the Plan area.</p> <p><u>Visitor Parking</u></p> <p>There is a remote possibility that in focusing on parking for residents rather than visitors, the net effect of Policy TT3 could be to reduce the overall requirement for parking below the minimum levels contemplated in the London Plan.</p> <p>➤ The London Plan sets minimum levels of 2 cycle spaces per apartment of 2 bedrooms and above one visitor space per 40 apartments.</p> <p>➤ In addition, Policy TT4 sets a higher minimum level of 3 cycle spaces for apartment of 3 bedrooms & above. It does not specify a higher level of visitor parking.</p> <p>In extreme circumstances where an apartment block has 40 2-bedroom apartments and no 3-bedroom apartments, there is therefore the possibility that Policy TT3 might be interpreted to allow a development which the Local Plan would prohibit.</p>

Ref	Origin	Subject	Comments
			<p>To address this concern, the Forum would recommend the insertion of “In addition to the Cycle parking requirements requirements set out in the London Plan” at the start of Policy TT3.</p> <p><u>London and Local Plan Context</u></p> <p>The adopted London Plan Policy 6.9(b) states that cycle parking should be “secure, convenient, integrated and accessible” and in accordance with the guidance contained in the London Cycling Design Standards.</p> <p>The adopted London Plan states that developments “in all parts of London” must meet minimum parking standards, but does not prohibit boroughs from setting higher standards where local conditions require. This approach is adopted by the Local Plan whose policy T1 indicates that higher standards may be required in the specific instance of locations “well served by cycle route infrastructure”.</p>

Vision for South End Green

Ref	Origin	Subject	Comments
27	DHRA	Shared Use	<p>Page 65 Vision for South End Green</p> <p>We do not agree that a shared use scheme at South End Green would be welcome as such a scheme would inevitably have knock on effects as far as diverting substantial amounts of traffic down neighbouring streets such as Downshire Hill. It is suggested that the vision of such a shared use scheme be caveated with the comment that such a vision is proposed as long as it can be shown that there will be no diversion of traffic to other side streets.</p> <p>Downshire Hill Residents Assn.</p>
			<p>To clarify, the neighbourhood's vision for shared use at South End Green relates to either or both of the two roads which are currently used as bus stands, for routes 168 and 24 respectively. Because of their existing use by buses, these roads are seldom used by private motor vehicles.</p>