

The Fortune Green & West Hampstead Neighbourhood Development Forum (NDF) would like to make the following comments and observations on the submission received from Camden Council during the consultation on the final draft of our Neighbourhood Plan - and to highlight suggested changes discussed with Camden Council officers for the examiner to consider.

Submitted by James Earl (Chair, NDF) 23 November 2014

	Issue raised	NDF comments/observations
1	Recommendations	<p>The NDF's position on the Recommendations is clearly set out in paragraph 1.7 of the Plan and on p41 of the Consultation Statement. We do not support any moves to remove the Recommendations from the main part of the Plan. We also note that none of the other respondents - including landowners, developers, public bodies or individuals - have raised this issue.</p> <p>To take into account the comments raised by LBC, we would suggest adding the following wording to paragraph 1.7: "For the avoidance of doubt, it is emphasised that these are aspirations and do not constitute or suggest agreement from Camden Council or other relevant bodies to fund or act on them".</p>
2	Layout	<p>The NDF notes that there is no guidance as to how neighbourhood plans should be presented. We believe the document we have produced is clear and easy to understand. We don't believe the various comments in the LBC submission about layout are relevant to the basic conditions. We also note that no one else raised this issue.</p>
3	Contributions	<p>Following discussions with LBC CIL/S106 officers, it was agreed to suggest additional new wording to paragraph 1.8 of the Plan:</p> <p>"....acceptable in planning terms; that are directly related to the development; and which are fairly and reasonably related in scale and kind to the development. The Plan highlights that development should contribute towards the positive development of the Area in different ways. Contributions may be in the form of both CIL and S106 financial contributions and/or appropriate design measures and 'in kind' improvements. The neighbourhood portion of the CIL can be spent on a wide range of items, provided that they meet the requirement to support development of the Area".</p> <p>To aid clarity, it was agreed to suggest changes to the title of Policy 18 to: "Developer contributions" and the title of Table 3 to "Priorities for the spending of developer contributions in the Neighbourhood Area".</p> <p>The NDF and CIL officers agreed that the Delivery Plan gives both sides a degree of flexibility in allocating the neighbourhood portion of the CIL in the years to come. The NDF will continue discussions with CIL officers following the introduction of the Camden CIL (expected Spring 2015).</p>
4	Viability	<p>To address the concerns about the issue of viability, raised by LBC and others, the NDF suggest the following changes to clarify the Plan in this regard by:</p> <p>a. Moving paragraph B4 to the introduction - making it clear that the</p>

		<p>statement about viability applies to the whole Plan and all the policies (and including a reference to NPPF paragraph 173).</p> <p>b. additional text to be added to the opening paragraph of B5, to read: "...of needs and requirements, across a range of sites, subject to viability and deliverability, and via S106/CIL contributions as appropriate".</p> <p>c. Add to the wording of the opening statement of Policy 4 to read: "Development in the WHGA shall, subject to a test of viability and as appropriate for each site:"</p> <p>d. Add to the wording of the opening statement of Policy 5 to read: "Any development of these sites shall, subject to a test of viability and as appropriate for each site:"</p>
5	Section 4	Officers have suggested that the paragraph in italics at the start of Section 4 should be moved to the introduction; the NDF agrees.
6	A4	Height will be addressed at the public hearing .
7	A5	Views will be addressed at the public hearing . We also suggest adding a reference to Map 2 in this paragraph.
8	A9	It is noted that in cases of permitted development, planning permission would not be needed and the Plan would not apply. If it is felt that it would aid clarity, the suggested text change would be accepted.
9	A14	Basements will be considered at the public hearing .
10	B5	To be consistent with B1, the housing section of B5 should refer to "a minimum of 800 new homes".
11	B7	Agree to add "the planning permission is being implemented".
12	B8	<p>It is suggested that the section relating to height (6th bullet point) be changed to:</p> <p>"The site shall provide an improved design relationship to the adjoining Canterbury Mansions and West End Green Conservation Area, to protect and enhance the character and appearance of the area. Therefore, the height of any new development should be no taller than the existing five storey building, unless the overall design and transition in massing achieves an appropriate relationship with neighbouring properties - and it can be demonstrated that no harm is caused to the character and appearance of the Conservation Area, its setting, and the views from and into the site".</p>
13	B10	<p>14 Blackburn Road - many of the requirements are suggestions and have been included following suggestions from the landowner (see Consultation Statement p49/50).</p> <p>Asher House - suggested wording change regarding height to read: "Any new building should take into account the change in ground levels of Blackburn Road and respect the character of the immediate area, for example by being lower in height than the student block or by following the alignment of rooflines on West End Lane".</p>
14	C2	<p>The statement from LBC contains a mistake: Planning application 2011/0395/P was approved on appeal Planning application 2012/0521/P was <u>refused</u> on appeal We note this site is on the agenda for the public hearing.</p>
15	C6	Camden Council is currently consulting on removing PD rights from part of the Neighbourhood Area, including Mill Lane. No change needed.
16	Policy 6	Agree to add title: "Public Transport".
17	Policy 7	Agree to add title: "Sustainable Transport".

		Add to opening sentence to read: "...which includes the appropriate provision of:"
18	Policy 8	Agree to add title: "Cycling". Add to opening sentence to read: "...which includes the appropriate provision of:"
19	Section 4E	Comments noted; further discussion at public hearing .
20	Policy 10ii	Suggest removing "significantly".
21	Policy 12v	Agree to add "Appropriate" as first word.
22	Policy 13	(see comments relating to C6). 13iii - add "Appropriate" as first word.
23	Policy 15	The NDF accepts there are errors on Map 8 relating to the exact boundaries of Maygrove Peace Park (H); 1 Mill Lane (G); Mill Lane Open Space (E); and Iverson Road Open Space (K). The hard surfaces issue can also be addressed in a revised map; as can clearer labelling of the railway embankments. We note these issues will be discussed further at the public hearing .
24	Map 8	The phrase 'Natural Areas' has been used to label green/open spaces that are not designated LGS. A suitable word change or clarification would be accepted.
25	Delivery Plan	As indicated above under 'Contributions' the issues raised here have been largely dealt with to the satisfaction both LBC & the NDF. Suggested changes to Tables 1, 2 & 3 are noted and largely accepted.