

DPNF RESPONSE TO EXAMINER'S QUESTIONS, 11 JUNE 2019

This document contains the response of the Dartmouth Park Neighbourhood Forum to the clarification questions raised by the Examiner in his letter dated 21 May 2019.

QUESTION	RESPONSE
<p>1. Could the NF explain the relationship between the statement on page 66 of the NP which confirms that there are 32 ha of accessible open space and another 9 ha of 'other open spaces' within the NP area; and the comment in the second paragraph on page 21 which concludes that there is 'comparatively little space actually open to the public'. Has Camden Council adopted any open space standards and if so are they met within Dartmouth Park? (you may like to liaise with the Council to ascertain the situation with regard to open space provision within the area)</p>	<p>See Map 2 of Camden Local Plan, which, by LBC's methodology, shows that part of the NP area (around Highgate Newtown) is "more than 400m from a larger publicly accessible open space". This could be clarified to say "part of the area", if necessary.</p>
<p>2. In the comments on the NP from Camden Council, reference is made to proposed areas of Local Green Space (LGS) which do not meet the criteria for LGS as set out in paragraph 77 of the 2012 NPPF. The concerns relate to LGS2 Highgate Enclosures; LGS4 Mortimer Terrace Nature Reserve; LGS5 York Rise Estate; and LGS8 Haddo House. Could the NF provide a response to those comments (perhaps in liaison with the Council) because on face value they appear to be particularly relevant?</p>	<p>LGS2 Highgate Enclosures: the inclusion of roads is a mapping error. We can, if necessary, provide a larger scale map excluding the roads and consistent with the Camden Policies Map. The title of this entry should also be changed to 'Highgate Enclosures and Grove Terrace Squares' to be consistent with the Policies Map.</p> <p>LGS4 Mortimer Terrace: The appearance of a dotted boundary must just be a feature of the scale of the map. All the proposed Local Green Spaces have the same type of border. It is not clear what 'area south of the railway' is being referred to. All the land shown for Mortimer Terrace is north of the railway.</p> <p>LGS5 York Rise estate gardens and allotments: Again, all the proposed Local Green Spaces have the same type of border. We can, if necessary, provide a larger scale map which excludes the parking areas and temporary buildings.</p> <p>LGS8 Haddo House: We agree that the area of car parking/service road should be excluded.</p>

<p>3. What is the justification for the area of ‘other’ open space at Lissenden Gardens, which in the Council’s response is numbered as 3? This appears to be a number of private back gardens?</p>	<p>This appears to be a mapping error. The area to be designated as Local Green Space should be limited to the community garden (1) and the tennis court and surrounding land (2).</p>
<p>4. Policy ES1 provides protection for other open spaces where possible – including land at William Ellis School. I understand from Camden Council (who own the land and lease it to the Schools Trust) that there are proposals to reconfigure the buildings and make other improvements. On that basis, what is the justification for providing all of this area with additional protection?</p>	<p>The plans for development of Parliament Hill and William Ellis Schools have been evolving in parallel with the preparation of the Neighbourhood Plan, but we believe the plans are now finalised as the works are in progress. The map in the Neighbourhood Plan could be amended to reflect the final school development plans. Alternatively, we would be happy to accept the mapping shown on the Camden Policies Map, except that we believe the area north of William Ellis School should be retained. This is a sport facility (football pitch) and the site of the very popular Farmers’ Market on Saturdays. However, we anticipate that the Camden Policies Map may itself need to be amended to reflect the new footprint of buildings on the Parliament Hill School site. Our intention is to protect these open green spaces from commercial development, should they no longer be needed for educational purposes. Perhaps development for educational purposes could be excluded from the designation of Local Green Space.</p>
<p>5. Similarly, what is the justification for including the protection of the private open space at La Sainte Union Des Sacrés Coeurs School (page 127)?</p>	<p>The grounds of La Sainte Union Des Sacrés Coeurs School are a large open green space with a number of mature trees, a remnant of an ancient orchard. This area provides a green lung in the heart of Dartmouth Park and an environment for a wide diversity of nature. In addition, tennis courts and other facilities are made available for community use. We believe the green space is also used for science experiments and gardens by the students. As with the Parliament Hill and William Ellis Schools, the intention is to protect this area from commercial development. Perhaps development for educational purposes could be excluded from the designation of Local Green Space.</p>
<p>6. Could the NF confirm the location of the community gardens/allotments referred to in Policy ES1(c)?</p>	<p>The gardens / allotments referred to in Policy ES1(c) are the Mortimer Terrace Nature Reserve (no 4 under Local Green Spaces), the York Rise estate gardens and allotments (no 5 under Local Green Spaces) and the Gardens at Lissenden Gardens (B under Other Open Spaces) on Fig 7A.</p>
<p>7. Could the NF explain what types of traffic calming measures (policy TS1) would be acceptable (bearing in mind that speed bumps would not supported by the NF) and also how they would be delivered?</p>	<p>Speed bumps came up several times in consultation as an unpopular measure. There are numerous other ways to calm traffic without vertical deflection. See paragraph 7.4.4 of Manual for Streets (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf), particularly those listed under ‘Psychology and Perception’.</p> <p>The most likely scenario for delivery of this element of policy TS1 is where developments that require planning permission include highways elements. It could also be delivered, perhaps in partnership with LB Camden and Transport for London, through</p>

	<p>Section 106 agreements where developments impact on highways. Importantly, the section 10.2 of the Neighbourhood Plan identifies list of projects, based on community engagement, that the Neighbourhood Forum is proposing that CIL funding is spent on; several of these involve highways and public realm work.</p>
<p>8. Policy TS3(c) refers to the provision of electric charging points for non-residential development. It is not clear to me what provision should be made with regard to charging points in residential development. Is this an issue addressed by the Local Plan?</p>	<p>Policy TS3(a) is that residential developments should be effectively car-free, so the logic follows that they should not be providing electric charging points. This mirrors the Local Plan policy.</p> <p>The Local Plan car-free policy does not quite extend to non-residential development, acknowledging that some businesses need to use vehicles. It is for these cases that we are proposing workplace electric charging points.</p> <p>We believe that the Local Plan is silent on electric charging points.</p>
<p>9. Although the NP only includes aspirations with regard to a number of housing sites (as opposed to policies), it is nevertheless important that the basis of those aspirations is clear. To that end could the NF provide the justification for:</p> <ul style="list-style-type: none"> • The figure of 500 homes on the Murphy’s Yard site as referred to on page 95 (option 1 of the Masterplan suggests 676 homes). • The reference to a five storey building height limit within the Protected Corridor and possibly the Peripheral Corridor, as identified in the Kentish Town NP. 	<p>The draft Neighbourhood Plan includes a number of community aspirations for what is understood to be a site with considerable development potential. These are based on five years of community engagement, the recommendations in the government-funded technical report by AECOM, and a comprehensive analysis of the existing policies that affect the site. Our consultations repeatedly found that the local community would support mixed use development on the site but not without reservations, for example on the impact on local services and on design quality: local people feel strongly and are ready to engage to help ensure that any development is of high quality and is in-keeping with the best of the surrounding neighbourhoods of Gospel Oak, Parliament Hill, Kentish Town and Dartmouth Park.</p> <p>Regarding the two requests for further justification, we provide this below, in reverse order because the second informs the first:</p> <p>Protected Corridor:</p> <p>The AECOM Murphy’s Yard Framework Masterplan was produced for DPNF to provide an overview of opportunities and constraints presented by the site. One of the principal constraints is the viewing corridor in the Kentish Town Neighbourhood Plan (which was described at its launch by the then KTNF Chair as the main policy that gained widespread community support, a sentiment reflected in the Reasoned Justification to KTNP policy D1) and, to our knowledge, the AECOM study is the only analysis of what the implications of the policy actually are in practice. This analysis is in section 3.1 of that report.</p> <p>The starting point is the topography data in figure 2.1 and the assumption that residential floor heights are an industry standard 3 metres. Figure 3.1 shows the findings. With regard to the core Protected Corridor, the heights shown are a straightforward representation of the maximum heights, expressed as storeys,</p>

needed to maintain the view of the highest point of Parliament Hill from outside Kentish Town station – it is important to stress that this is not an interpretation of the made/adopted policy, merely a factual illustration.

Height limits in the Peripheral Corridor are more open to a degree of interpretation given the policy wording, lacking definition of “compatible with the view in terms of setting, scale and massing”. We think that the AECOM approach of adding two storeys to the maximum heights in the Protected Corridor is a reasonable one, particularly as this is a wide, open view.

500 homes:

This question is partly answered by the note on page 1 of the AECOM report that:

“This report has been prepared on our behalf by consultants AECOM. It includes two options for the redevelopment of Murphy’s Yard, should the company take the decision to relocate.

Option 1 shows what the maximum development potential might be given the policy and other constraints on the site, but this option is not favoured by DPNF, largely due to its impact on neighbouring properties.

Option 2 has been designed to maximise the potential of the site whilst being more in keeping with the local built and natural environment context, and this is the option that we intend to take forward for consultation with the community in the Neighbourhood Plan.”

As noted above, our community is expected to welcome high quality development on the Murphy’s site if it is clearly and thoughtfully designed in response to context. This is also an approach that has policy backing at all levels, as highlighted below.

At the national level, the NPPF places good design at the heart of the planning system, noting that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities” (paragraph 124 (2008)). The NPPF goes on to root neighbourhood planning at the heart of the drive for quality development: “Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development” (paragraph 125). This is exactly what we are doing with our aspirations for Murphy’s Yard.

	<p>We understand the pressures to maximise the number of homes on the site, both in terms of meeting housing targets and, from a landowners/developer perspective, maximising profit. But we have identified no support for an ultra-high density high rise development at this sensitive location and there is nothing in policy that suggests that maximising capacity should be at the expense of quality placemaking. There is also some concern about the impact on the treasured view from Hampstead Heath.</p> <p>Housing is one of the predominant issues facing us and the DPNF supports a mix of housing types and typologies, including a healthy proportion of apartments, but we would have to question any assumptions that a scheme of this scale would be entirely made up of apartments. We believe that terraced houses and mansion blocks have stood the test of time and proved to be London’s most successful housing typologies, and that, along with a small number of towers in less sensitive parts of the site by the railway, are the natural response to the policy restrictions that exist in adopted policies. This is based on an understanding that there is more than one way to do density, as evidenced by what are widely regarded to be the best new neighbourhoods in Europe (such Hammarby and Royal Seaport in Stockholm, where towers are rare) and the best old ones in London, including our own area.</p> <p>Option 2 is not a low density option. At more than 120 dwellings per hectare, it is higher than any surrounding neighbourhoods and is towards the top end of the London Plan density matrix (assuming urban and PTAL 2-4).</p> <p>Furthermore, all of our community aspirations are fully compliant with every element of Camden Local Plan policy D1 Design, from point a) “respects local context and character” onwards. Please also note the cautionary approach of policy D1 to tall buildings.</p> <p>Site capacity is also influenced by:</p> <ul style="list-style-type: none"> - the need to retain significant employment floorspace on site - the need to include community and cultural uses - the widespread support received for a green link through the site from Kentish Town station to Hampstead Heath, which would most logically happen on the alignment of the Protected Corridor. <p>In summary:</p> <ul style="list-style-type: none"> - Option 1 shows a maximum site capacity in light of policy and other constraints - Option 2 also draws on placemaking and contextual factors to arrive at an indicative capacity that is more suitable - Option 2 is a policy compliant option
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	<ul style="list-style-type: none"> - Our approach is an excellent example of the NPPF’s strong emphasis on communities using neighbourhood planning to define the special character of their areas to influence design as a way of planning positively for growth.
<p>10. Can the NF demonstrate that the submission version of the NP has adequately taken into account the references to the Murphy site in policy SP2 (page 42) and in the text on page 47 of the made Kentish Town NP – a site that straddles the boundary between the two NP areas?</p>	<p>Yes. It is correct that a small part of the Murphy’s site is in the KTNF area. A Memorandum of Understanding is in place between the two Forums to address any cross-boundary issues and we have had shared site visits and a number of meetings with KTNF about the Murphy’s site.</p> <p>Policy SP2 notes that it “only applies to the part of KTPDA in the Kentish Town neighbourhood area. Policies for the remainder of the area will be developed in due course through Dartmouth Park’s neighbourhood plan”. The two Forums have a shared understanding that the Murphy’s site, alongside the Kentish Town Industrial Area, represents a significant opportunity for a housing and employment-led mixed use development. The community aspirations in section 9.4.1 are very well aligned with the general development criteria in policy SP2a of the KTNP.</p>
<p>11. The boundary of the NP is identified on Figure 1A (page 6). However, this does not precisely tally with the boundary identified on plan 3A (page 17). For example, to the north of the Neighbourhood Area in the vicinity of Raydon Street and to the south-east, close to Churchill Road. Can the NF confirm which boundary is the correct one?</p>	<p>Figure 1A is the definitive boundary to the NP area.</p>
<p>12. There is a very minor discrepancy between the boundary of the Kentish Town Neighbourhood Plan and the NP just to the west of Acland Burghley School. A small ‘island’ of land (which appears to be in the vicinity of the railway line) is not covered by either Neighbourhood Plan. Is this intentional?</p>	<p>This is a short stretch of railway where it is uncovered, briefly emerging from a tunnel. There are two parallel lines there – Gospel Oak-Barking and freight line, which is the land in question. As it is south of the Gospel Oak-Barking line, it would be logical for it to be in the Kentish Town Neighbourhood Plan area. We do not know why it is not.</p>
<p>13. The NP correctly includes a chapter on Delivery, Monitoring and Review and Appendix 5 includes a list of projects that could contribute towards the achievement of the NP’s objectives. Although</p>	<p>We anticipate that the DPNF Committee will continue in existence and continue to coordinate community response to planning and related issues (such as traffic issues that strictly fall outside planning). We would work alongside and coordinate with the Dartmouth Park Conservation Area Advisory Committee, but would have a wider remit which would not be limited geographically to the Conservation Area or by subject to listed building or</p>

<p>the table on page 105 refers to the monitoring role of the NF, it is not clear to me how that role will evolve. Has the NF given any detailed consideration as to how the momentum it has achieved will be sustained in the future?</p>	<p>Conservation Area issues. We would anticipate consulting on and commenting on significant planning issues in the Area, in particular development on Specific Neighbourhood Sites such as the Murphy's site. We will also continue to work with Camden and the Kentish Town Neighbourhood Forum on the development of the Kentish Town Framework, if it is not completed prior to the adoption of the Neighbourhood Plan. We also anticipate that a large part of our activities will be focussed on delivering the Projects identified in the Plan as opportunities arise.</p>
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