

Triggs, Andrew

From: Allan Mayo [REDACTED]
Sent: 30 July 2020 18:21
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I should like to support the Redington Frogna! Neighbourhood Plan. It is very important that the much needed policies are adopted to maintain the character of the area, preserving trees and gardens, while allowing appropriate future development.

Allan Mayo

Triggs, Andrew

From: barbara alden [REDACTED]
Sent: 10 July 2020 14:33
To: PlanningPolicy
Subject: Redington Frognal Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

As someone who lives in the Redington Frognal Neighbourhood I am writing in support of this new Neighbourhood Plan. The area has a particular architectural character, with significant features which the Plan seeks to preserve and even enhance, such as nature conservation and bio-diversity, all seen nowadays as essential contributions in addressing climate change and the health of the nation.

As an established Conservation Area, it is important for this status not to be compromised, and the Neighbourhood Plan will provide a clear framework for future plans to comply with.

Sincerely

Barbara Alden
[REDACTED]

Triggs, Andrew

From: Robert Taylor [REDACTED]
Sent: 28 August 2020 16:42
To: PlanningPolicy
Subject: Redington Frogna Draft Neighbourhood Plan Response
Attachments: Redington Frogna Neighbourhood Plan response Final.docx

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Please find attached our response document.

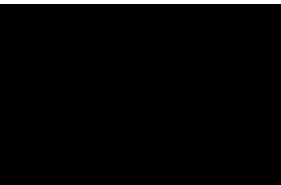
We would wish to participate in a public meeting, if one is held, and we would also like to be notified of the Council's final decision.

Thanks

Robert Taylor

Organiser

Camden Federation of Private Tenants (CFPT)



Twitter: @CamdenFPT

Website: www.cfpt.org.uk

Please consider the environment before printing this email or its attachments

A response to the draft Redington Frognal Neighbourhood Plan by Camden Federation of Private Tenants – August 2020

Who we are

Camden Federation of Private Tenants has been in existence since 1980, and is funded by Camden Council to represent the views and interests of private renters in the borough.

We have a broad definition of what a private tenant is and we work with and support the 3 following groups of residents:

- Private tenants who rent from private landlords
- Housing association residents
- Private (non-Council) leaseholders

Some of our members live in the catchment area covered by the Redington Frognal Neighbourhood Forum, and they have raised concerns with us about some sections of their draft neighbourhood plan, in particular where it references residential properties including many bedsit/HMO homes between 166 and 200a Finchley Road, NW3 (**Pages 78/79 Site Reference RF7**).

Our objections stem from the proposal's seeming lack of concern at the potential loss of affordable rented bedsit/HMO housing and the fate of those 100 or more tenants likely to be summarily evicted should the proposed scheme ever be permitted.

In our opinion, there are misrepresentations of fact, a lack of understanding of the difference between self-contained flats or “apartments” as they call them and houses in multiple occupation, along with some practical flaws in the plan.

Worse, the proposal for this site could easily serve as an entree for the usual array of property developers who acquire homes that are relatively affordable to Londoners in order to replace them with, often, fewer and more expensive homes - which are well beyond the means of our members and most local residents.

We note that one of the contributors to the neighbourhood plan is Create Streets, who describe themselves as “**a built environment social enterprise and independent research institute**”, and who say on their website that “**We work with Local Authorities, Housing Associations, landowners and developers....**” They list Redington Frognal Neighbourhood Forum as one of their “clients” and they say one of their aims is to create “beautiful” developments.

The document describes 166-200a Finchley Road as "accessed via a seedy alleyway which suffers from anti-social behaviour and (in May 2016) rat infestation" (Page 79 Paragraph 1).

We would respond as follows:

- 1) The pathway (or "seedy alleyway") is jointly owned by the freeholders of the buildings. None of the freeholders live on site, and they make no effort to maintain it. In fact, the property owners are a problem - their builders frequently abandon waste materials and rubble on the path. When the pathway has been cleaned, apart from by residents or by Camden Council, it has been when landlords were trying to let the vacant flats.
- 2) Some years ago, rats originating from building works on land behind No.1 Frognaal affected Hampstead Gate's rubbish containers. As far as you could tell, the path and premises between 166 and 200A Finchley Road were not affected.
- 3) Anti-social behaviour (drug dealing and drug use) appears to stem from a gang based in Lithos Road, on the opposite side of Finchley Road. This activity affects the area behind shops on the corner of Lithos Road and Finchley Road, Frognaal Court further up Finchley Road and the office development at Hampstead Gate. It also affects Netherhall Gardens and the area adjacent to University College School on the corner of Frognaal and Arkwright Road.
- 4) It should be pointed out that residents of 166-200A Finchley Road have nothing to do with this activity. In the past five years, residents (and businesses in Hampstead Gate) have worked with the Metropolitan Police's Gang Unit and Safer Neighbourhood Team, to identify the dealers and cars they use, at considerable risk to themselves.

The neighbourhood plan proposes constructing rear extensions to 166-200a Finchley Road (Page 79 Paragraph 2).

We would respond as follows:

- 1) Extensions could not be constructed without decanting, or more likely, by evicting approximately 100 residents. Should they manage to return, they would find their access to daylight (at the rear) obscured in part or entirely by the new structures.
- 2) During repairs, Camden environmental health officers were concerned with corrosion to the century-old iron framework which is the key support of the existing buildings. Floor space has been increased by removing chimney

breasts - which you would assume were important to the buildings' structural integrity.

- 3) Retail premises have basements at rear which are frequently damp from water ingress from the path, with potentially unstable brickwork - and ad hoc alterations. Adding further load to this infrastructure would be reckless without considering any need for major reinforcement works to residential and retail spaces.
- 4) We would also point to the major fire at 173-175 Finchley Road where extensions and alterations made access by firefighters difficult and confusing, hampering efforts to evacuate residents and tackle the fire - which subsequently was not fully extinguished within 24 hours.

The neighbourhood plan proposes refurbishing the buildings into apartments that would be "highly desirable" (Page 79 Paragraph 2).

We would respond as follows:

- 1) The present accommodation largely consists of bedsit/HMO homes, which Camden seeks to preserve through the Camden Local Plan, Policy H10, mainly occupied by single employed women including, at times, young NHS hospital doctors.
- 2) One effect on the whole community of the continuing loss of affordable homes is the difficulty local businesses have in recruiting. The big local supermarkets have staff commuting from as far away as Leytonstone in east London.
- 3) The neighbourhood plan is another step in a process where the lowest-paid workers may be forced to travel the furthest to work.
- 4) The neighbourhood plan (just as they speak elsewhere of "amalgamating" small flats into larger homes) could actually lead to a reduction of the number of homes available (Page 11 SD 1 iv.) and we believe that this is contrary to the Camden Local Plan, Policy H3.
- 5) Camden is one of the most expensive areas to rent in the country, and genuinely affordable private rented housing is very hard to find locally – and it's widely acknowledged to be a key factor in the present national housing crisis. We believe that any reduction in the supply of this is contrary to the Camden Local Plan, Policy H4.

How representative of the neighbourhood is the Neighbourhood Forum and their Neighbourhood Plan?

The Redington Froggnal Neighbourhood Forum appears to be a small group of people who own homes in some of the most expensive parts of an area which has a much wider social, economic, ethnic and age base.

In the Consultation Statement (Page 21) it states: "**The inaugural meeting of the Redington Froggnal Neighbourhood Forum was held on 1 May at 8 pm in Bay Hall at King's College. The meeting was attended by all three ward councillors, but achieved a relatively low turn-out among residents, with just 21 attendees and 10 apologies**".

The forum says on their website: "**The Regulation 14 public consultation launched at the October AGM attracted 70 responses from residents. A prize of a bottle of champagne had been offered to the 100th respondent, but this target was not met**".

This also from one of their meetings: "**An attendee noted that the Neighbourhood Plan had been poorly publicised....**" And this from a website post in July 2016 hardly indicates mass support for their proposals amongst the thousands of residents living in the catchment area: "**Comment forms were available, in addition to an online survey, yielding 19 written responses, six online responses....**"

They also went to the expense of using Land Registry records to address the site's freeholders - but did not inform actual occupants of a potential threat to their homes. A CFPT member only learned of the proposals due to a letter to one of the freeholders being misdelivered.

We are, therefore, really concerned that a self-appointed group which seems to lack that very diversity, and doesn't seem to have obtained the views of the area's non-homeowners feels it is able to represent the views and interests of people who are much less prosperous, and much less secure because of their housing tenure; with the likelihood of making things worse for them in the future.

Because of this, we believe that the neighbourhood plan contradicts its own stated aim (f), which is: "**promoting or improving the social, economic and environmental wellbeing of those living and working in the area**".

Conclusion:

Camden's 2025 Vision (page 11) states: "**We are clear that London's Housing Crisis threatens Camden's social mix and this threat should be regarded as a call to action to everyone with the power to make a difference however small. Whether renting or buying, homes should be affordable and secure**".

We ask that the part of the plan which addresses privately rented housing is withdrawn for failing to meet the stated objectives of the Camden Local Plan as stated previously. In addition, 3.275 states **“We will consider whether proposals could reduce mix, inclusivity...”**, and again for the reasons stated previously, we believe that the plan could lead to this outcome.

Finally, we are surprised to see that the neighbourhood plan says little about the biggest problem of this stretch of Finchley Road - which is Finchley Road itself. Widened in the 1960s (when it lost its trees) it is now blighted twenty-four hours a day, seven days a week, by constant traffic noise and fumes.

Triggs, Andrew

From: Claire McLean [REDACTED]
Sent: 30 June 2020 10:39
To: PlanningPolicy
Subject: RE: Notice of receipt of a proposed Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Planning Team,

Thank you for this recent consultation – I can confirm that as the Canal & River Trust has no land or waterspace near or within the proposed neighbourhood area, we have no comments to make.

Please feel free to contact me if you have any further queries relating to the Trust.

Kind regards,

Claire McLean MRTPI

Area Planner London
[REDACTED]

Canal & River Trust

The Toll House, Delamere Terrace, Little Venice, London, W2 6ND

Please note, my working days are Tuesday, Wednesday and Thursday.

Sign up for the [Canal & River Trust e-newsletter](#)

Become a fan on [Facebook](#). Follow us on [Twitter](#) and [Instagram](#)



From: Camden Council <CamdenCouncil@public.govdelivery.com>

Sent: 29 June 2020 13:39

To: Claire McLean <Claire.McLean@canalrivertrust.org.uk>

Subject: Notice of receipt of a proposed Neighbourhood Plan

CAUTION: This email originated from an external source. DO NOT CLICK/OPEN links or attachments unless you are certain of their origin.

Dear Sir / Madam,

Notice of receipt of a proposed Neighbourhood Plan

Redington Frognaal Neighbourhood Forum has submitted its proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are now consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including sustainable development, biodiversity, community infrastructure, shopfronts and basements. It also identifies sites to be designated as 'local green space'.

The Neighbourhood Plan, if approved, will be used, alongside the Council's policies when making planning decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan - the 'neighbourhood area') and for further information on how to respond to this consultation please go to:

www.camden.gov.uk/neighbourhoodplanning - see 'current consultations'

Comments must be received by **Monday 7th September 2020** and should be sent via e-mail to planningpolicy@camden.gov.uk or post to:

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

If you are unable to access the documents on the internet or make representations online, please contact us on 020 7974 8988.

What happens next?

Once the consultation has finished, the Council will forward the responses and the Neighbourhood Plan to an independent examiner. The examiner will assess whether the Plan meets the statutory requirements. If the Plan passes the examination, a referendum will be organised to give the community the final say on whether the Plan is to be used in determining planning applications in the designated neighbourhood area.

Due to the pandemic, there are currently some alterations to how neighbourhood plan examinations and referendums will work. For further information, please see the Government's website:

<https://www.gov.uk/guidance/neighbourhood-planning--2>

If you have any further queries, please do not hesitate to contact us:

Tel: 020 7974 8988 or e-mail planningpolicy@camden.gov.uk

[Unsubscribe](#) or [manage your Camden Council email subscriptions](#).

This email was sent to claire.mclean@canalrivertrust.org.uk using GovDelivery Communications Cloud on behalf of: London Borough of Camden · 5 Pancras Square · London · N1C 4AG



Keep in touch

Sign up for the Canal & River Trust e-newsletter <https://canalrivertrust.org.uk/newsletter>

Become a fan on <https://www.facebook.com/canalrivertrust>

Follow us on <https://twitter.com/canalrivertrust> and <https://www.instagram.com/canalrivertrust>

This email and its attachments are intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them; please delete without copying or forwarding and inform the sender that you received them in error. Any views or opinions expressed are solely those of the author and do not necessarily represent those of The Canal & River Trust.

Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Triggs, Andrew

From: Catherine Hays [REDACTED]
Sent: 07 July 2020 15:43
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Forum - proposed Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Planning,

I am emailing with my support for the proposed Red Frog Neighbouring Plan which if approved will be used alongside the Council's policies when making planning decisions in the Red Frog area.

As a member of the Canopy Coalition, I support the plan to incorporate these policies:

- Sustainable Development policies
 - maximising the size of soft, natural gardens and restrictions on the amount of garden building;
 - retention of front gardens, front garden walls and hedges;
 - the requirement to plant native trees with a high value to biodiversity;
- Biodiversity and Green Infrastructure policies
 - retaining, providing and reinstating trees, hedgerows and incorporating other planting, using native species;
 - the need to retain and incorporate trees in any development;
 - the need to create, strengthen and restore tree lines and biodiversity corridors, reducing the incidents of breaks and the length of gap;
- Underground Development policies:
 - the requirement for 2-3 metres of soil above all basement development to ensure the viability of the viability of trees and provide potential for future tree planting;
 - the requirement that basement development will not contribute to localised groundwater flooding;
 - detailed requirements for Basement Impact Assessments.

I am hoping the Red Frog Neighbourhood Plan gets through so that Camden will then incorporate some of these policies in the next update to its own Local Plan.

Best regards,
Catherine

Catherine Hays
[REDACTED]

Triggs, Andrew

From: Christoph Lampert [REDACTED]
Sent: 04 September 2020 21:21
To: PlanningPolicy
Subject: Red Frog neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I support the proposed neighbourhood plan Kind regards

Christoph Lampert
[REDACTED]

Triggs, Andrew

From: Florian Leonhard [REDACTED]
Sent: 03 July 2020 14:37
To: PlanningPolicy
Subject: Fwd: Redington Frogna! Neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Sirs,

I am writing with a suggestion for your consideration. I am very pleased with the very balanced project of the RedFrog Neighbourhood Forum. In addition to the project I feel that Frogna! Lane is too much of a race track for people trying to cut through the area between Finchley Road and Hampstead.

Traffic calming measures should be in place here. I had suggested to a department in Camden council c.15 years ago that some permanent planting pots that have access to the soil below so that water can seep through to the ground along the high pavement towards the bottom of Frogna! Lane could be a good measure to deal with the problem of speeding as well as the high pavement there. Cars would need to wait for each other to pass the planters which would lead to the traffic being slower and less dangerous and it would make it less attractive for large tourist buses to cut through. That is just an example but it would help the calmness and greenery in this leafy part of London and would think it would be an opportunity missed if not added to the plan since the whole area would benefit from less cars accessing the area.

I am happy to go into greater detail with drawings if requested.

Thank you for your consideration.

Sincerely yours,

Florian Leonhard

Frogna! Lane

Triggs, Andrew

From: Izak Uziyel [REDACTED]
Sent: 04 September 2020 16:57
To: PlanningPolicy
Subject: support of the proposed Redington Frognal Neighbourhood Plan.

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Camden Planning,

We support of the proposed Redington Frognal Neighbourhood Plan.

Freda & Izak Uziyel

[REDACTED]

Triggs, Andrew

From: Geoff Thornton [REDACTED]
Sent: 03 July 2020 14:13
To: PlanningPolicy
Subject: proposed Neighbourhood Plan: Redington Frognal

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

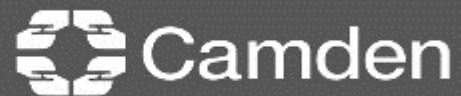
Dear Planning Policy Dept

I have read the proposed plan and wholeheartedly agree with it - we have only lived in Greenaway Gardens for 13 years but have seen many changes in the neighbourhood - basements, front gardens paved etc. Hopefully this will make it more difficult in future for the precious green spaces in the area to be lost.

Professor Geoff and Mrs Anna Thornton
[REDACTED]

-----Original Message-----

From: Redington Frognal <redfrogemail@gmail.com>
CC: PlanningPolicy <planningpolicy@camden.gov.uk>
Sent: Wed, 1 Jul 2020 21:42
Subject: Notice of receipt of a proposed Neighbourhood Plan



Dear Sir / Madam,

Notice of receipt of a proposed Neighbourhood Plan

Redington Frognal Neighbourhood Forum has submitted its proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are now consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including sustainable development, biodiversity, community infrastructure, shopfronts and basements. It also identifies sites to be designated as 'local green space'.

The Neighbourhood Plan, if approved, will be used, alongside the Council's policies when making planning decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan - the 'neighbourhood area') and for further information on how to respond to this consultation please go to:

www.camden.gov.uk/neighbourhoodplanning - see 'current consultations'

Comments must be received by **Monday 7th September 2020** and should be sent via e-mail to planningpolicy@camden.gov.uk or post to:

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

If you are unable to access the documents on the internet or make representations online, please contact us on 020 7974 8988.

What happens next?

Once the consultation has finished, the Council will forward the responses and the Neighbourhood Plan to an independent examiner. The examiner will assess whether the Plan meets the statutory requirements. If the Plan passes the examination, a referendum will be organised to give the community the final say on whether the Plan is to be used in determining planning applications in the designated neighbourhood area.

Due to the pandemic, there are currently some alterations to how neighbourhood plan examinations and referendums will work. For further information, please see the Government's website: <https://www.gov.uk/guidance/neighbourhood-planning--2>

If you have any further queries, please do not hesitate to contact us:

Tel: 020 7974 8988 or e-mail planningpolicy@camden.gov.uk

[Unsubscribe](#) or [manage your Camden Council email subscriptions](#).

This email was sent using GovDelivery Communications Cloud on behalf of: London Borough of Camden · 5 Pancras Square · London · N1C 4AG



Triggs, Andrew

From: Hassan Ahmed <Hassan.Ahmed@london.gov.uk>
Sent: 27 August 2020 13:08
To: O'Donnell, Brian; PlanningPolicy
Cc: Anna Turner
Subject: RE: GLA officer response Redington and FrognaI Neighbourhood Plan – Submission Version (Reg 16)

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Brian

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Redington and FrognaI Neighbourhood Plan – Submission Version (Reg 16) Consultation

Thank you for consulting the Mayor of London on the Submission version of the Redington and FrognaI Neighbourhood Plan (RFNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2019, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Redington and FrognaI Neighbourhood Area includes the London Plan and Camden's Local Plan.

The Intend to Publish London Plan

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish (ItP) version of the London Plan[1] was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Camden's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the ItP London Plan. The ItP London Plan and its evidence base are now material considerations and officers welcome the RFNP's reference to both the ItP London Plan.

As currently drafted the RFNP is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

General

Officer's welcome that the Neighbourhood Plan's aims are set out clearly early on at page six of the document and are largely consistent with the Mayors Good Growth objective GG1, Building strong and inclusive communities, as set out in the ItP London Plan by providing the local community the opportunity to shape growth in the area. The full extent of the neighbourhood boundary is set out on page 7, but the image could be clearer to make it easier to

precisely identify which land lies within it. It would also be beneficial to illustrate how the neighbourhood boundary relates to the Redington Froggnal Conservation Area which could be included in a map.

Up until now, preparation of the Redington and Froggnal neighbourhood plan has taken more than six years. Since establishing the neighbourhood area in 2014, there have been numerous occasions of meaningful community engagement. This level of local involvement is welcomed and supported by officers and reflects the Mayor's Good Growth objective GG1 which encourages early and inclusive engagement with local communities.

Local character and green spaces

The forum's intention to protect and enhance the character of the conservation area is supported and welcomed by officers. The neighbourhood plan demonstrates a clear understanding of the local historic environment and the heritage values of local sites and areas and their relationship with their surroundings. This approach is consistent with ItP London Plan Policy HC1.

The identification of locally important green spaces in draft Policy BGI 4 is supported by Officers and partly reflects the approach set out in Policy G4 of the ItP London Plan. Officers encourage the forum to identify clearly and easily those spaces which are currently publicly accessible and seek to ensure that these remain so when new development is proposed. This would be in accordance with other elements of Policy G4 of the ItP London Plan.

Basement development

Officers welcome Draft Policy UD 1 of the RFNP which is consistent with the approach set out in the ItP London Plan Policy D10, instructing Development Plans to identify those areas where there are potential negative impacts from large-scale basement developments. The RFNP should note that the Mayor supports boroughs in restricting large-scale basement excavations under existing properties where this type of development is likely to cause unacceptable harm as set out at paragraph 3.10.3 of the ItP London Plan.

I hope you have found these comments helpful to inform the preparation of the Redington and Froggnal Neighbourhood Plan. If you would like to discuss any comments in this letter please contact, Hassan Ahmed, on 020 7983 4000 or at hassan.ahmed@london.gov.uk.

Regards

Hassan Ahmed
Senior Strategic Planner
London Plan Team
Development Enterprise and Environment

Greater London Authority | City Hall, The Queen's Walk, London SE1 2AA
E: Hassan.ahmed@london.gov.uk



NHS health information and advice about coronavirus can be found at [nhs.uk/coronavirus](https://www.nhs.uk/coronavirus)

The Mayor and the GLA stand against racism. Black Lives Matter.

GREATER LONDON AUTHORITY NOTICE:

The information in this email may contain confidential or privileged materials. For more information see <https://www.london.gov.uk/about-us/email-notice/>

^[1] [https://www.london.gov.uk/sites/default/files/intend to publish - tracked.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_tracked.pdf)

Triggs, Andrew

From: Harlan GMAIL [REDACTED]
Sent: 22 August 2020 09:02
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden Planning,

I am writing to strongly support adoption of the Redington Frogna! Neighbourhood Plan. I urge you to pass it and put it into force immediately. I am aware of the huge and lengthy efforts of members of the community, and of Camden, to develop and promote a plan that blends the interests of all relevant parties and will lead to a more sustainable Camden.

Yours sincerely,

Harlan Zimmerman
[REDACTED]

Harlan Zimmerman

Triggs, Andrew

From: Harvey Flinder [REDACTED]
Sent: 09 July 2020 12:36
To: PlanningPolicy
Subject: Redington & Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

For the attention of The Examiner.

I would like to register my support for the Redington & Frogna! Neighbourhood Plan. It's an important document reflecting the concerns and aspirations of the people who live and work in this historic conservation area.

Many of the issues raised have been debated and reported on over the past decade but with little progress. Now, in the face of a climate emergency, I hope that this thorough and professional document finally succeeds where others have stumbled.

I wish them every success.

H. Flinder
Camden resident.

Triggs, Andrew

From: Helen S Anderson [REDACTED]
Sent: 04 July 2020 14:32
To: PlanningPolicy
Subject: Proposed Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I refer to the proposed Redington Frogna! Neighbourhood Plan. I have lived in Frogna! for nearly 17 years, so appreciate the neighbourhood as it was when I first bought my flat as well as with the modern properties and additions and contemporary updates to buildings which have developed over the years. This is not Hampstead Garden Suburb with its uniform hedges and prescriptive rules. The diversity and evolving character of Frogna! and Redington is one of the positives of this area. Moreover, Camden Council already has sufficient means within existing planning laws to control work carried out to properties, including numerous tree preservation orders even where trees have been identified as causing subsidence (with the consequential economic cost to owners of inflated insurance premiums).

If implemented, the NP is likely to have economic ramifications for owners and will discourage diversity, making Frogna! and Redington ever more an enclave for privileged and entitled resident owners and buy to let investors. Community is important to this area. Limiting redevelopment, repair and refurbishment as suggested, is also likely to make it more difficult for people on lower incomes, the young, old and families to carry out work to stay in the area (whether by adding suitable space or simply the economics of carrying out overly prescriptive repairs and replacement of windows, doors etc.). The heart of Hampstead (including Frogna! and Redington) has always been the diversity of its population.

Also, why seek to limit home office or other work garden buildings (if not causing a nuisance to neighbours or out of kilter with conservation area policies (and this is already covered by existing planning)? Home working spaces are in tune with modern lifestyle and can have a positive impact both on residents' wellbeing and the area generally e.g. less use of public transport, more footfall for the high street and local businesses generally etc.

Accordingly, I object to the NP's implementation as being too prescriptive and importantly, unnecessary given the adequacy and already prescriptive nature of existing planning regulations applying to this area (including in relation to conservation areas). If implemented, I believe there it is likely to have a negative impact on retaining diversity in this area, both architecturally and in terms of the resident population.

Regards

Helen Anderson
[REDACTED]

Triggs, Andrew

From: Archer, Heather <Heather.Archer@highwaysengland.co.uk>
Sent: 04 September 2020 12:23
To: PlanningPolicy
Subject: 10607 Response 4 September 2020 Redington Frogna! Neighbourhood Plan Submission Draft Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Redington Frogna! Neighbourhood Plan Submission Draft consultation

Dear Planning Team

We welcome the opportunity to comment on the Submission Draft version of the Redington Frogna! Neighbourhood Plan which covers the period from 2020 to 2045. It is noted that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in this case particularly the M1 approximately three miles northwest of Redington Frogna! Neighbourhood Plan area.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Redington Frogna! is required to be in conformity with the adopted Camden Local Plan (2016-2031).

We note in the Camden Local Plan Policy G1 that 16,800 homes, 695,000sqm office floorspace and c30,000sqm retail floorspace are needed to meet the objectively assessed needs to 2031. Development will take place throughout Camden Borough through a concentration of development in the growth areas of, King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road; development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead; and the Council's Community Investment Programme (CIP). We do not consider that this level of growth will impact the SRN; particularly as no housing target has been established for Redington Frogna! and there are no allocated housing development sites in the Neighbourhood Plan.

We have no further comments and trust the above is useful in the progression of the Redington Frogna! Neighbourhood Plan. However, please do continue to consult Highways England as the Neighbourhood Plan progresses.

Please continue to consult Highways England at our inbox: planningSE@highwaysengland.co.uk.

Regards

Heather

Heather Archer, Assistant Spatial Planner

Highways England | 1st Floor, Bridge House | Walnut Tree Close | Guildford | GU1 4LZ

██████████ Please note that my telephone number has been diverted to my mobile.

Web: <http://www.highwaysengland.co.uk>



Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.



Historic England

By email: planningpolicy@camden.gov.uk

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

Our ref. PL00503946

Telephone



4 September 2020

Dear Camden Planning Policy Team

Draft Redington Frogna! Neighbourhood Plan

Thank you for consulting Historic England in respect of the Draft Submission Stage Redington and Frogna! Neighbourhood Plan.

Thank you for consulting Historic England in respect of the revised draft of the Redington Frogna! Neighbourhood Plan.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

We have commented on previous consultations during the development of the plan and we do not therefore intend to comment in detail. In 2012 we provided area assessment training with Camden Conservation Area Advisory Committees focused on the Redington and Frogna! Conservation Area, we are therefore pleased to note the submission of a draft plan and the strong emphasis on local historic and architectural character, and the identification of policies to protect and enhance the historic environment. We have previously advised the



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



that Redington Froggnal Plan proposes a significant control over the form of new development and we have encouraged the Neighbourhood Forum work closely with the local authority planning and conservation team to ensure that policies and aspirations can be delivered through the planning system. We are pleased to note that our principal issues in respect of conformity with NPPF policies for heritage and the potential for Article 4 Directions and local view management have been addressed.

Historic England Advice

The aspirations for the Plan to preserve and enhance the historic character of the area, and the strong contribution made by the mature gardens and planting are to be supported. The green environment is a great asset to the area, providing not only a visually attractive setting but also creating an environmental buffer against the busy Finchley Road.

We can however offer a number of minor observations in respect of the policies and guidance on heritage which can, in our view, make these more focused.

Non-designated Heritage Assets, Para 4.4 Page 14 . It would be useful to clarify paragraph 3 which states non-designated Heritage Assets may be identified by the following :

identified in the Redington Froggnal Conservation Area Statement as positive or neutral contributors, either on their own, or as a group of buildings;

or included in the list of listed buildings and non-designated heritage assets, for which the Forum requests local listing, as shown as shown in 6.1 Non-Designated Heritage Assets for Local Listing;

or identified as non-designated heritage assets

The identification of non-designated heritage assets within Neighbourhood Plans is in line with the latest planning guidance (MHCLG 2019), where this is demonstrably evidenced. The final statement "or identified as non-designated heritage assets" does not identify where, or how, these assets are identified. If this means an existing local authority list or a new list it would be beneficial to state this or add "already identified as non-designated heritage assets" by the local authority.

The paragraph also identifies buildings making a neutral contribution to character as potential heritage assets. Buildings which make a neutral contribution to the character and appearance of the conservation area are often problematic and this would benefit from further clarification (for this reason some authorities dispense with this categorization). Given the age of the existing conservation area appraisal a reassessment would be beneficial as this would allow for an up to date analysis of significance.

Policy SD6 Page 23. This policy could be made more explicit through the applying the policy specifically to heritage assets or buildings and structures where features contribute positively to the character and appearance of the conservation area and the significance of the asset.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



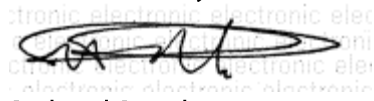
This would allow for the removal and replacement of features which detract from the character and appearance and potentially enable replacement with more appropriate details.

FR Finchley Road : Traditional Shopfronts, Page 51 . Notwithstanding the importance of Victorian and Edwardian Shopfronts to the character area, we would suggest that wording to the effect that replacement shopfronts should reflect the age and character of the principal façade. This would ensure that appropriate designs respond to the existing character of the building where this contributes positively to the character and appearance and is of a later date than Victorian or Edwardian.

We hope that these observations are of assistance in consideration of the proposed Redington Froggnal Neighbourhood Plan.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.

Yours faithfully



Richard Parish
Historic Places Adviser
Historic England



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Triggs, Andrew

From: Janet Gompertz [REDACTED]
Sent: 04 September 2020 17:12
To: PlanningPolicy
Subject: Please accept our Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Camden's Planning Dept.

I write to urge you to please accept our Redington Frogna! proposed Neighbourhood Plan.

It has taken 6 years of dedication to compile it together with an enormous amount of good will, commitment and hard work from volunteers.

We desperately need to preserve our neighbourhood from over development and preserve our green corridors and mature trees for future generations.

Yours Faithfully

Janet Gompertz

[REDACTED]

Triggs, Andrew

From: Jonathan Gestetner [REDACTED]
Sent: 03 September 2020 09:14
To: PlanningPolicy
Subject: Hydro geology

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Sir

I am extremely concerned about the underground streams and the effect that Camden's basement policy will have on them.

Streams start as well spread out water collection capillaries.

They are not just one defined source. Any basements can disturb the Balance and result in unforeseen consequences.

I think that .RedFrog's pollycy on these should be Taken into account.

The underground streams are an essential part of the geology of the area and must on no account be Disturbed

Kindest Regards

Jonathan Gestetner

Triggs, Andrew

From: Josephine Field [REDACTED]
Sent: 13 August 2020 08:44
To: PlanningPolicy
Subject: RedFrog Neighbourhood Plan Submission Draft consultation

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden Planning Team,

I am writing you in regards to the Redington Frognaal Neighbourhood Plan Submission Version – May 2020. In particular their proposal for the "copse behind 17 Frognaal."

For the past two years, [REDACTED] and are very familiar with this site. Because I am a Director of a Community Land Trust in Camden I was very interested to see the proposal for a self-build on that site. I reached out to Nick Sofroniou to ask him about his plans about a year ago. I was delighted to learn that he is a local resident who is planning to build a modest eco house that is AFFORDABLE! I have seen many proposals in Camden and most try to extract as much profit as possible and deliver 0% affordable housing in NW3. Nick's proposal is completely different, it is considerate and it delivers many of the objectives that I have seen in Camden's Local Plan.

While I commend the RedFrog volunteers for dedicating their time to thinking about how to improve the neighbourhood I feel their section concerning "the copse behind 17 Frognaal" is not only very harmful to a local resident, I believe it is also unreasonable. First of all, they claim that development is unwelcome because this area is a Conservation area. 80% of Camden is a conservation area and I do not believe being in a Conservation area is justification enough for preventing development of much needed affordable housing. In fact, I think many conservation areas in London have much to contribute to the housing crisis and could do so in a way that creates more diverse and flourishing communities. Hampstead suffers from an ageing population where schools have empty spaces because key workers like many of our NW3 CLT members can't afford to stay and raise families. Nick is a local person who works at a family-run bakery, he is committed to the area, has family connections, and is proving that even people on modest incomes can create their own housing solutions.

In regards to RedFrog's specific statements about "the copse" at 17 Frognaal and their desire to maintain the greening of the area, Nick's plans are for a house that would have a green roof, he has plans to enhance the trees on his land and re-green as much as possible, he has already investigated and ensured no bats would be harmed and is even looking to avoid connecting into services unnecessarily and reusing greywater. I can't imagine a more green proposal. Also, I question Fursefen's documentation on wildlife as I lived directly adjacent to his property for two years and did not see one black squirrel. The site will still have trees to block noise from Finchley and due to its location is completely unrealistic as a local space that could be accessed by anyone except the property in front of it. It seems to be a huge shame to waste the opportunity for an innovative form of affordable housing when his plans do not compromise what RedFrog is hoping for the area to achieve.

As an involved member of the NW3 community, this proposal saddens me because it feels like one that is motivated by residents who have more of a voice than Nick instead of reflecting genuine concerns about the impact of his proposed self-build. This is a shame because I know that RedFrog residents could have a very positive conversation with Nick and achieve all of the outcomes that their neighbourhood plan purports to want without the animosity that I fear will come about.

I hope Camden will grant Nick planning permission swiftly and put an end to this debate that would unnecessarily end a really innovative and affordable proposal from a local resident.

Thank you for your time,
Josephine Field

Triggs, Andrew

From: Kate Colleran [REDACTED]
Sent: 07 September 2020 08:57
To: PlanningPolicy
Subject: Comment on RedFrog neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

From: Kate Colleran [REDACTED]
Sent: 07 September 2020 00:05
To: 'planningpolicy@camden.gov.uk'
Subject: Comment on RedFrog neighbourhood Plan

To Camden Planning Policy Department.

Thank you for sending the above document. I feel it has incorporated a number of very valuable suggestions/proposals for the benefit of those of us who live in the neighbourhood and enhancing the environment generally.

As noted above, the document is careful in its balance in retaining features that characterise this area whilst making useful and practical suggestions on how redevelopment could take place whilst retaining its character.

The importance of Local Green Spaces cannot be stressed enough, particularly in parts where overdevelopment had already taken place. The copse behind 17 Frognaal as Local Green space (LGS 6) greatly in need of protection from further development and to be retained as a Local Green Space.

Yours sincerely,

Kate Colleran
[REDACTED]

Triggs, Andrew

From: Ken Howard [REDACTED]
Sent: 01 September 2020 11:35
To: PlanningPolicy
Subject: Redington Frognal Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden Planning,

I would like to express my full support for the Redington Frognal Neighbourhood Plan. This document has been well researched and reflects my own views for the future management of this unique Redfrog area. I do hope that the Council will implement its very sensible and timely suggestions.

Yours sincerely,

Ken Howard

Ken Howard



For the attention of:

The Neighbourhood Plan Examiner of
the Redington Froggnal Plan

Asset Strategy & Valuation
London Borough of Camden
3rd Floor, 5 Pancras Square
London N1C
Tel: 020 7974 1605

Email: ashiff.merali@camden.gov.uk

Dear Sir / Madam

Re: Studholme Court, Finchley Road, NW3 7AE – lawn and planted area

Regarding Site LGS 4, Studholme Court, we would wish to make the following observations:

Clarity of Information

We would note that there appear to be several discrepancies in the presentation of site information.

- (a) Page 38 contains a map of the Proposed Local Green Spaces, Red Frog Area. However, within this map the site identified as LGS4 (Studholme Court) is shown as being outside of the Red Frog area boundary. We would request that this is suitably clarified.
- (b) Page 42 contains a further site definition and description. This description shows a hatched plan described as *“proposed boundaries for Local Green Space designation”*. However the description then notes the *“Plan seeks to designate the rectangular area shaded mauve as Local Green Space.”* There is a contradiction between these 2 descriptions and the boundaries on Page 38 and LGS 4 map are inconsistent.
- (c) Page 37 contains a table which notes compliance with NPPF Paragraph 100. The site description notes LGS 4 *“Studholme Court - the area shaded mauve”*. This again creates some ambiguity between the site areas hatched in pages 38 and 42 and it should be clarified that any compliance demonstrated only refers to this small area shaded mauve.

In summary, and in reference to the National Planning Practice Guidance on Neighbourhood Planning, we would assert that the maps are not “clear and unambiguous”; they are not “precise”. We are concerned that the discrepancies in the Plan’s mapping undermines the effectiveness and robustness of the public consultation processes undertaken to date. Due to this flaw in the publicity of the designation, we do not consider that designation of the local green space should proceed at this time.

Compliance with Planning Policy

Notwithstanding the fundamental flaws in the descriptions and identification for the local green space designation, the Council is also concerned about compliance with national and local planning policy.

- (a) The information submitted in the draft plan does not seem to effectively demonstrate compliance with NPPF Paragraphs 99 and 100. We do not agree that the evidence submitted within the report provides sufficient clarity that the area noted is “demonstrably special” and of “particular local significance” as required by the NPPF. No supporting arguments to show there are grounds within a wildlife ecological or biodiversity arena that would benefit the community. For example, a suitable site might comprise a Nature Reserve that would help local school children in their wider learning.
- (b) In reference to the Camden Local Plan 2017, Policy G1, Delivery & location of growth, sets out the Council’s objectives for supporting development within the borough and how to meet required housing needs as addressed in Policy H1, Maximising housing supply.

Camden is committed to providing good quality housing and tackling the impacts of London’s housing crisis in the borough. These commitments are outlined in both Camden 2025 and the organisational response to that document, Our Camden Plan. Through the Community Investment Programme (CIP) Camden has committed to continue to tackle the housing crisis head-on. These commitments, as outlined in Our Camden Plan, include:

- (i) ensuring that more Camden homes have been built in over a generation.
- (ii) building as many genuinely affordable homes as we can as quickly as we can and supporting others such as housing associations to do so as well.
- (iii) ensuring that we build mixed communities with well-designed homes and infrastructure to encourage participative and healthy lifestyles.

Since Camden embarked on the CIP in December 2010 we have invested over £500m delivering over 800 homes, delivering new and refurbished schools and increasing and improving our portfolio of community facilities. Through the CIP, Camden is developing an emerging Small Sites Programme which aims to identify further potential small and infill sites within Camden’s ownership which could provide additional housing.

The Draft London Plan (intend to publish version) outlines in Policy H2 Small Sites how boroughs can support the delivery of new housing on small sites and, *that increasing the rate of housing delivery from small sites is a strategic priority.*

We support the inclusion of this estate in future feasibility review as part of the Small Sites Programme to provide additional housing and to support Camden Local Plan Policy especially H1, H4 and H5 to meet housing needs in the borough.

Summary

In reference to the National Planning Policy Framework, Camden Local Plan, Camden 2025 and The London Plan, we would assert that the sites identified within Studholme Court should not be designated as Local Green Space in order to protect the opportunity for future housing provision in this location. As part of the Small Sites Programme full participation and consultation from resident and councillor consultation would take place and this site would be no exception.

The definition of Paragraphs 100 and 101 of the National Planning Policy Framework (NPPF) 2019 (please note para 77 in the NPPF 2012 was superseded). This landscaped area is primarily for the amenity of estate residents not the wider local community. By definition, a local green space should only be designated if it is shown to be of special value and significance to the local community i.e. in relation to some historic, recreational or wildlife / biodiversity importance.

The Council therefore does not support the designation of Studholme Court as Local Green Space. The land shown in red on the plan consists of grassed areas and verges and we do not consider that they are demonstrably special or of particular local significance in accordance with the above to be suitable for designation and cannot see any argument for a wider recreational use given its layout access and size.

Yours faithfully

amerali

Mr A Merali
Asset Strategy and Valuation Team
London Borough of Camden

Redington Frogna! Neighbourhood Plan submission draft

Camden Council – local planning authority representation

Overall comments

This representation is being made by Camden Council in its capacity as local planning authority. Colleagues from the Council's property service will also be making comments on the Plan (specifically Policy LGS4) but these will be made separately reflecting the Council's role as landowner.

Throughout the development of the Neighbourhood Plan, the Council has commented on a number of draft plans and policies. This has helped to address conformity with Camden's planning policies and strategies and national planning policy. We recognise that the structure and clarity of the document has been significantly improved across the various draft stages. The policies are helpfully grouped according to the main issues of local concern and the policies are presented in a logical format throughout the Plan.

The Council considers the Plan is a well-presented and readable document and will have an important role in helping the Council to make decisions on planning applications in the area. It will especially help the Council with the application of the Local Plan's design and heritage policies and will sit well alongside the existing, and emerging Conservation area appraisal, by providing further definition of the area's qualities.

A concern for the Council during the Plan's preparation has been excessive prescription or an overly onerous approach. It is important that planning policies are formulated in a way that allows for the different types of application that come forward in the Plan area, for which the degree of impact on the locality/conservation area will vary. The Council has highlighted examples of this prescription in its responses to earlier drafts and we consider that the Plan is now worded much more flexibly. Nevertheless, we still consider there are instances where the Plan would still limit the ability to exercise discretion in determining individual planning applications according to their merits. In some cases, the Plan's wording conflicts with the Council's ability to form judgements in line with legislation relating to trees, the natural environment and heritage/conservation.

A repeated issue raised by our representation is the requirement that proposals "must" do something. This prevents a decision maker from deciding what weight to attach to different material considerations; this has the effect of elevating a single, and sometimes relatively minor, policy consideration/criterion to a situation where it will be the determinative factor in whether a planning

application should be granted. We do not consider that the Government intends policies to be used in this way. Paragraph 16 (a and b) of the National Planning Policy Framework (NPPF) states that plans, including neighbourhood plans, should be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable. Framing policies as something ‘should’ happen or ‘it is expected that’ provides more leeway for responding to the unique nature of individual schemes/sites.

Comments on individual policies / paragraphs

To assist the consideration of the matters we have raised, and for the sake of clarity, we have suggested possible alterations to the text; however, we consider that other wording may be appropriate where this achieves a similar outcome. Where we have suggested the deletion of text, there may be instances where alternative wording could be used which addresses the Council’s concerns.

Ref.	Comment	Suggested amendment to Plan
1.1, 2 nd paragraph	It would be helpful if an additional sentence could be added to indicate that the neighbourhood area has been re-designated.	End of paragraph: <u>The neighbourhood area was re-designated on 25th October 2019.</u>
1.2 2 nd paragraph	“current Conservation Area appraisal” – a factual update is needed in this section to indicate that the appraisal has now been reviewed and a draft prepared.	<u>“...to provide a current review and update the Redington/Froggnal conservation area appraisal as evidence of need for the SD and BGI policies. By October 2019, the work had not been commissioned. During 2020, a new draft conservation appraisal has been prepared.</u>
2.1, first paragraph	We suggest removing the word 'occasional' in the first paragraph as the Plan cannot limit opportunities for sustainable development and needs to plan positively for development, in line with paragraph 16 of the National Planning Policy Framework.	The Forum recognises that the area is likely to evolve over time as a result of changes to the climate, existing buildings, the occasional introduction of new

		buildings and careful and positive changes to the streetscape and public realm.
Plan Aims, page 6	The fifth aim does not make complete sense. We assume it is referring to the concentration of facilities/services for tertiary education, the arts and culture, rather than to a specific facility.	Maintaining and promoting the area as a <u>a c</u> Centre for Tertiary Education, arts and culture.
4.1 page 10	<p>While we agree that opportunities for development can be more limited within a conservation area, a significant proportion of development in Camden occurs within these areas, not least because they comprise over 50% of the Borough. The NPPF states that plans should be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively in a way that is aspirational but deliverable. (Paragraph 16 a and b).</p> <p>Similarly, the phrase: <i>“The Forum believe that the Plan Area has no vacant or under-used sites other than those identified within section 5. Possible Redevelopment Opportunities”</i>.</p> <p>This represents one snapshot in time – vacancy levels will change and it is not possible to say with confidence that all sites/buildings in the Plan area represent the optimal capacity of development.</p>	<p>“...and the scarcity of available <u>large, unconstrained</u> development sites limits opportunities for new construction <u>means opportunities for new construction will have to be particularly sensitive.</u> Nevertheless...”.</p> <p>This phrase is edited as follows: The Forum believes that the Plan Area has no vacant or under-used sites other than those identified within sSection 5 Possible Redevelopment Opportunities <u>shows current known vacant or under-used sites.</u></p>
Policy SD1 (i), page 11	<p>Planning decisions have to balance protection of biodiversity and gardens with a range of other planning matters, such as the importance of local housing needs being met. The presence of habitats/species will sometimes be a material consideration, however the National Planning Practice Guidance advises: <i>“it is for the decision maker to decide what weight is to be give(sic) to the material consideration <u>in each case...</u>”</i> (underlining is our emphasis), Paragraph 009 Reference ID: 21b-009-2014 0306</p> <p>We are concerned the phrase <i>“must have no adverse impact...”</i> cannot be reasonably delivered across all development proposals. This runs contrary to advice set out in the National Planning Policy Framework (NPPF) that planning policies/plans should protect biodiversity sites <i>“in a manner commensurate with their statutory status”</i> and by</p>	<p>Development must have no adverse impact on <u>Harm or loss of</u> biodiversity and wildlife habitat, including through loss of garden space., <u>should be avoided.</u></p>

	distinguishing between a “ <i>hierarchy of sites</i> ”. In paragraph 175 of the NPPF, advice on determining planning applications refers to “ <i>refusing</i> ” proposals involving the “ <i>significant</i> ” loss of biodiversity, once alternative sites, adequate mitigation and compensation have been considered and also refers to the protection of “ <i>irreplaceable</i> ” habitats. The Neighbourhood Plan potentially goes far further by its restriction against any harm to biodiversity.	
Policy SD1 (ii), page 11	<p>Paragraph 55 of the National Planning Policy Framework (NPPF) states that planning conditions should only be imposed where they are “<i>necessary, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects</i>”. While biodiversity offsetting can be an effective and highly practicable mechanism for mitigating impacts on biodiversity, especially in cases involving larger developments, there is currently no provision for this to be made a requirement in managing individual planning applications. We therefore do not think this can be applied to all developments where there is an impact. Further paragraph 175 of the NPPF refers to the role of local planning authorities in managing “<i>significant</i>” impacts on biodiversity.</p> <p>We also note that in some cases, involving smaller, constrained sites, offsetting within the site may not be feasible.</p>	If there is likely to be an adverse <u>significant</u> impact, this must <u>should</u> be offset by gains elsewhere within the site, such as tree and hedge planting.
Policy SD1 (iv) page 11	We support this criterion, however the Council currently seeks to protect Houses in Multiple Occupation (HMOs) in most circumstances in line with Camden Local Plan Policy H10 and Policy H3(c) paragraphs 3.66 and 3.79. The policy should therefore be focussed on changes affecting self-contained accommodation.	Where single houses have been sub-divided into <u>self-contained</u> flats....applies to all development of a site since 26 June 2006.
SD1 (vi), page 11	<p>“front boundary walls....”</p> <p>We support this approach but it would be helpful if the supporting text acknowledges that permitted development rights can apply.</p>	Add to the end of supporting text: <u>Front garden boundary walls and hedges will often be a positive feature of the conservation area and should be retained or reinstated subject to planning control.</u>

<p>4.4, page 14</p>	<p>The 2nd and 3rd paragraphs refer to the application of the Plan’s SD and BGI policies to “<i>Buildings...forming a positive or neutral contribution</i>”. The Council would like to see the text distinguish between positive and neutral contributors.</p> <p>The word neutral has multiple definitions but can mean something that is ‘unexceptional’, ‘commonplace’ or ‘bland’ – a neutral building, therefore, may not contribute to the special interest of the conservation area or if does, in only a limited way.</p> <p>Paragraph 201 of the National Planning Policy Framework (NPPF) states that “<i>Not all elements of a Conservation Area...will necessarily contribute to its significance. Loss of a building (or other element) which makes a <u>positive</u> contribution to the significance of the Conservation Area...should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole</i>”. (our underlining)</p> <p>Policy D2 (f) of the Camden Local Plan confirms that we will “<i>resist the total or substantial demolition of an unlisted building that makes a <u>positive</u> contribution to the character or appearance of a conservation area</i>”. (our underlining)</p>	<p>Buildings which contribute to the special interest of the Redington Froggnal Conservation Area, including those forming a positive or neutral contribution and those....</p> <p>It should be recognised that unlisted buildings in the Conservation Area individually and collectively contribute to the special interest of the area.</p> <p>Non-designated heritage assets may be identified through the following:</p> <ul style="list-style-type: none"> • (1st bullet) Identified in the Redington Froggnal Conservation Area Statement as positive or neutral contributors, either on their own, or as a group of buildings; or • (3rd bullet) Identified as non-designated heritage assets <u>outside of the ways listed above</u>
<p>Policy SD3, page 16</p>	<p>Policy T2 of the Camden Local Plan already imposes a ‘car-free’ requirement to most types of development and therefore criterion (i) repeats existing policy. Full details of how our car-free requirement is intended to apply are set out in paragraphs 5.6 to 5.10 of Camden Planning Guidance: Transport (March 2019).</p>	<p>Delete criterion (i) because it is repetition of the Local Plan.</p>

	<p>Paragraph 16(f) of the National Planning Policy Framework (NPPF) states that plans should “<i>serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</i>”</p> <p>Criterion (iii) is applicable to proposed as well as existing parking spaces.</p>	<p>Last criterion: For existing <u>and proposed</u> parking spaces, provision of charging points for electric vehicles is encouraged.</p>
4.6, page 16	<p>First paragraph – the supporting text here could be interpreted as reducing the scope of the car-free policy contrary to the intent of the NP policy.</p> <p>The Council’s exemption to car-free is applicable to a returning occupier or where a change of use brings a site/property into residential occupation (as per paragraph 10.20 of the Local Plan).</p>	<p>The policy applies to all kinds of development, whether or not involving demolition, but does not require existing parking spaces to be relinquished <u>may be retained by a returning occupier or where a change of use to residential occurs.</u></p>
Policy SD4 (i), page 18	<p>We agree that development must complement the area’s character – as set out in the policy’s first paragraph; however, the requirement that it “<i>must reflect the established characteristics of the area</i>” is overly prescriptive. The word ‘reflect’ suggests the same/identical to that which already exists. It is also likely to be difficult to operate when these “established characteristics” could be very many in number and some will inevitably be considered more “established” than others.</p> <p>The terminology conflicts with the types of innovation supported by paragraph 60 of the National Planning Policy Framework: planning policies “<i>should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain developments or styles</i>”.</p>	<p>The scale, massing and height of development must reflect <u>should be informed by</u> the established characteristics of the area, responding to <u>such as the</u> prevailing 2-4 storey building height.</p>
Policy SD4 (ii), page 18	<p>Notwithstanding the putative shift to greater use of design codes and a more ‘rules-based’ approach to planning (as envisaged in the Planning White Paper), a cap on heights by street is likely to be unduly prescriptive.</p>	<p>Mid-rise development of up to six storeys <u>is likely to be acceptable</u> will be considered for sites fronting Finchley Road, between Frognaal and Frognaal Lane, and up</p>

	<p>We consider it should still be possible for applicants to make a justification that deviates from any <i>indicative</i> height, subject to the range of contextual considerations relevant to the site.</p> <p>We have suggested a possible rewording to the criterion that would provide greater certainty for residents and applicants of the likely acceptable scale/height while not entirely ruling out higher schemes where this can be justified by a high quality design response.</p>	<p>to four to five storeys between Froggnal Lane and Platt's Lane and two to four storeys north of Platt's Lane, where the prevailing building heights are much lower. <u>Proposals above these levels may be considered where the design has been informed by the established characteristics of the area and suitable evidence provided that meets the Council's satisfaction.</u></p>
<p>Policy SD4 (iv), (v), (vi), page 18</p>	<p>We agree that a building's setback is important from a design and heritage perspective. However, it is one of a number of potential considerations and alternative approaches have to be considered by the Council based on their individual merits. Further, in making decisions on planning applications, we are required to take all relevant policies into account which could possibly outweigh any harm on design/heritage grounds.</p> <p>The same issue applies to plot coverage ratio and garden space. They are important aspects of development management, especially within a conservation area, but on their own may not be determinative in the assessment of a planning application. Under planning law, the Council is required to weigh all the relevant planning considerations, which will include assessing any impacts on the significance of heritage assets.</p> <p>The National Planning Practice Guidance advises: <i>"it is for the decision maker to decide what weight is to be give(sic) to the material consideration <u>in each case...</u>"</i> (underlining is our emphasis), Paragraph 009 Reference ID: 21b-009-2014 0306</p>	<p>In criteria (iv), (v) and (vi) replace "must" with 'should'.</p>
<p>Policy SD4 (ix), page 18</p>	<p>As (iv) to (vi) above, we believe that it may be possible for an applicant to justify an exception.</p>	<p>The spacing of houses must <u>should</u> allow for maintenance and retain the verdant, biodiverse character of the area.....</p>

	<p>The application of ‘fixed’ gaps between buildings also appears excessively prescriptive. While this can be helpful in providing an indication of what might be acceptable, the policy should still allow for the testing/consideration of alternatives.</p> <p>The Council notes that there are some existing buildings (e.g. Redington Road) where these distances are less. Some flexibility is justified because appropriate dimensions will vary across the Plan area.</p>	<p>At the end of criterion, add: <u>A deviation from the gaps stated may be considered where the design has been informed by the established characteristics of the area and suitable evidence provided that meets the Council’s satisfaction.</u></p>
Policy SD4 (x), page 18	<p>We consider that some flexibility might be allowed in this criterion. For example, it may be less important for authentic materials be provided in the case of a secondary door which is not visible in public views.</p> <p>Ensuring durability across all modern materials is not considered feasible.</p>	<p>Where traditional materials are used in new buildings, they must <u>should</u> be authentic traditional materials <u>rather than artificial or imitation</u> and reflect the palette of materials in the surrounding area, and not comprise synthetic materials, such as <u>Use of</u> uPVC or materials with an imprinted or applied surface to imitate traditional materials <u>should be avoided</u>. Where modern materials are used, they must <u>should</u> be durable, with a high standard of finish.</p>
4.8, page 19	<p>It would be helpful if the first paragraph clarified that the eight sub-areas are identified in the conservation area appraisal.</p>	<p>The policy applies across the Conservation Area’s eight sub areas <u>(as identified in the 2003 conservation area appraisal)</u> and section of Finchley Road...</p>
4.8, page 19	<p>5th paragraph: we agree with Policy SD4 (iii) that development must avoid significant detriment to loss of light; however, the definition in the supporting text suggests that this applies to <i>any</i> loss of light to habitable rooms or gardens. This goes considerably</p>	<p>Loss of light or the introduction of shading will be assessed in accordance with Camden</p>

	<p>beyond Local Plan Policy A1 'Managing the impact of development' which states that access to sunlight, daylight and overshadowing for habitable, outdoor amenity (i.e. gardens) and open spaces will be assessed using an evidence-based approach. The Council assesses the acceptability of a proposal by using the BRE's 'Site Layout Planning for Daylight and Sunlight'.</p> <p>This approach and our existing planning guidance is the most effective means of ensuring this matter is controlled consistently across the borough. Further, it provides a mechanism through which 'acceptability' can be judged whereas under the neighbourhood plan approach even a very limited impact might mean that an application has to be refused, contrary to National Planning Policy Framework (NPPF) paragraph 16 (a) and (b).</p>	<p>Planning Guidance on amenity will be deemed significant if daylight or sunlight are reduced, or shading increased to habitable rooms or gardens of neighbouring properties.</p>
<p>Policy SD5 (i), page 21</p>	<p>Generally the approach is supported but the framing of an 'either/or' outcome: i.e. the use of "matching materials" or "contrasting materials" prevents consideration of any other alternatives. This contradicts paragraph 60 of the National Planning Policy Framework (NPPF) which refers to not prescribing architectural styles or forms in order to be able to allow for innovation. It also conflicts with paragraph 16 of the NPPF that plans should be "<i>contribute to the achievement of sustainable development</i>" and "<i>be prepared positively</i>".</p> <p>It would be helpful if the supporting text was clearer about the policy intent.</p>	<p>Use either matching <u>It is expected that the materials and roof-form will match</u> of the existing building, including and include the use of authentic traditional materials, or using contrasting <u>Alternative</u> materials, forms and construction <u>may be considered</u>, where this would help to maintain the original composition of the building.</p> <p>In section 4.10 Application, at the end of the 4th paragraph: The quality of design and authenticity and quality of materials are key factors. <u>particularly to avoid poor pastiche development.</u></p>

<p>Policy SD5 (iv), page 21</p>	<p>As SD4 (ix) above, we believe that it may be possible for an applicant to justify an exception.</p> <p>We are concerned about the prescription implied by ‘fixed’ gaps between buildings. While this can be helpful in providing an indication of what might be acceptable, the policy should still allow for the testing/consideration of alternatives.</p>	<p>The spacing of houses must <u>should</u> allow for maintenance and retain the verdant, biodiverse character of the area.....</p> <p>At the end of criterion, add: <u>A deviation from the gaps stated may be considered where the design has been informed by the established characteristics of the area and suitable evidence provided that meets the Council’s satisfaction.</u></p>
<p>4.10, page 22</p>	<p>To match the sequence of the policy, it is suggested that the third and fifth paragraphs in this section are swapped.</p>	<p>Swap third and fifth paragraphs</p>
<p>Policy SD6 (i), page 23</p>	<p>We support the general policy intent, but do not consider “must” can be applied in all cases. This may mean refusing schemes that are acceptable in terms of their degree of impact. There also may be instances where windows need to be replaced, for example double-glazing in order to better insulate a home.</p> <p>Notwithstanding, the reasonable desire to retain/reinstate high quality features, the policy does not consider what might occur if they are of low value.</p> <p>More flexible wording is suggested in place of the existing text.</p>	<p>Front boundary walls and original architectural details, such as chimneys, windows and porches etc., must <u>should</u> be retained- <u>where they are form an important part of the character and design of the host building / conservation area.</u></p> <p>Where such features have been removed previously, their reinstatement is encouraged.</p>
<p>4.13, page 25</p>	<p><i>“Experience suggests that lack of clarity provides planners and developers with the opportunity to degrade the environment and dilute the aspirations of the Redington Froggnal Conservation Area Statement and Guidelines.”</i></p>	<p>Deletion of this paragraph</p>

	<p>The Council protects the environment within the parameters provided by national planning policy and has adopted planning policies for protecting the natural environment in the Camden Local Plan and extensive planning guidance on matters including biodiversity and trees. As explained elsewhere in our response, there will often be a range of considerations that must be weighed by decision makers which may sometimes outweigh protection of outdoor amenity space or trees.</p> <p>We consider that neighbourhood plans should be positive, forward-looking documents and are not an appropriate tool for criticism of previous decisions.</p>	
<p>4.13, page 26</p>	<p><i>“However the low status of the Conservation Area Statement in the planning hierarchy has meant that Camden has been powerless to enforce its guidelines, with the result that gardens and particularly large gardens, have been dramatically eroded by building extensions, outbuildings and basements”.</i></p> <p>The Council’s conservation area statements are supplementary planning guidance documents and can be a material planning consideration but have less weight than a planning policy document such as the Neighbourhood Plan or Camden Local Plan.</p> <p>This paragraph, as currently phrased, could undermine the status of the existing appraisal.</p> <p>Appraisals are an important consideration in a conservation area but there may be other material considerations which are relevant and may justify doing something different, or in a different way, to what the appraisal is recommending. Changes to planning policy, including national planning policies, can have the effect of overriding an existing appraisal. Further, some works will occur that fall outside of planning control entirely because they are permitted development (or not ‘captured’ by the definition of development), situations in which the appraisal is likely to have limited influence.</p>	<p>Delete this paragraph.</p>
<p>4.13, page 27</p>	<p><i>“Three planning consents at Sarum Chase....construction of one dwelling at the copse behind 17 Frogna1 has been recommended for approval (October 2019)”.</i></p>	<p>Deletion of this paragraph</p>

	As pages 25 and 26 above, we do not consider the neighbourhood plan is an appropriate vehicle to speculate on the merits/legitimacy of past planning decisions or emerging proposals.	
BGI1, page 29	<p>We generally support this policy and the biodiversity enhancement measures listed which are appropriate for the Plan area.</p> <p>It is understood it applies to all gardens: front/rear/side and therefore minor amendments to the text are recommended for clarity.</p>	<p>The title to be changed to: <u>Rear-g</u>Gardens and ecology</p> <p>In criterion (iv): Retaining front hedges and walls and taking opportunities....</p> <p>In the first paragraph of the supporting text, 4.14:</p> <p>Applications should demonstrate their compliance with this policy by providing plans for planting, hedging and soft surfaces for front gardens and boundary treatments <u>which meet the Council's requirements</u>.</p>
BGI2 (i), page 33	<p>The Council normally seeks the retention or replacement of trees where they are affected by development proposals. However, the criterion does not provide the same flexibility as Policy BGI1(v) where the applicant may demonstrate to the Council that replacement planting is not possible.</p> <p>Trees may on occasions need to be removed if they would be adversely impacted by a proposal (e.g. because of the loss of breathing space). The loss may also be justifiable in circumstances where a low value/immature species is located in a well-planted garden or where there are conflicts with underground services. There can also be other material planning considerations which may outweigh the loss of a tree, especially if it is of low value.</p>	<p>Trees must be retained <u>and protected where appropriate</u>, and incorporated in any development-, <u>with special consideration given to veteran trees, and in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction'</u>.</p>

	<p>Where works are being considered to a non-TPO tree in a conservation area, and this is not directly related to a planning proposal, the landowner has a duty to notify the local planning authority using a section 211 notice. This enables the Council to reach an informed judgement on whether the works should proceed. Alternatively the Council may wish to make a TPO, giving the tree(s) protection where it is justifiable to do so.</p> <p>For TPO trees, where works to/loss of trees is being proposed, the Council is required to consider such proposals against criteria in the national planning practice guidance and consult locally (e.g. Paragraph: 089 Reference ID: 36-089-20140306, Paragraph 090 Reference ID: 36-090-20140306 and Paragraph ID: 36-091-20140306). This includes drawing on the use of “<i>appropriate expertise</i>” in coming to a decision – consideration of proposals affecting TPO trees have to be exercised on a case-by-case basis. Doing otherwise would be perceived as taking away the existing legal rights of landowners.</p> <p>For consistency in the Council’s decision-making between the Redfrog plan area and the rest of the Borough, and between tree works that form part of a planning proposal and those that do not, the Council needs to be able to exercise its discretion about whether a tree needs to be retained. Moreover, to ensure that there is a systematic approach to the safeguarding of trees in the Borough, we expect developers/householders to follow the principles and practice set out in the British Standard 5837: 2012 Trees in relation to Design, Demolition and Construction (this standard is promoted by Policy A3 of the Camden Local Plan 2017).</p>	
<p>Policy BGI2 (v), page 33</p>	<p>We consider that the protection of deadwood can be encouraged but this is not something that the Council is able to enforce.</p> <p>The references to buffer zones for veteran trees and canopy works address complex matters which are more comprehensively addressed by the advice set out in BS5837:2012 ‘Trees in relation to Design, Demolition and Construction’ and BS:3998 Tree Work – Recommendations respectively. We do not consider that selectively</p>	<p>Delete existing text and replace with: <u>The retention of deadwood is encouraged, where appropriate.</u></p> <p>Delete final two paragraphs of supporting text under 4.16 (page 33).</p>

	referring to issues already addressed in the British Standards is helpful as it draws attention away from consideration of this advice in its entirety.	
Policy LGS4, page 42	<p>The Council's property service will be responding to this proposal in their capacity as landowner. We would, however, draw attention to a number of inconsistencies in the mapping of this local green space between the map of local green spaces on page 38 and the map of LGS4 specifically on page 42. Confusion is created by the inconsistent boundaries of this local green space as presented across the two maps. Further, in LGS4 the text states that the boundary relates to the 'purple-hatched' area but the map and key suggests that all the amenity land within the estate is included as part of the designation. The map on page 38 also incorrectly shows the neighbourhood /plan area boundary.</p> <p>Due to the errors in the publicity of the designation we consider that this proposed local green space should be deleted.</p>	The local green space proposal should be deleted.
Policy LGS6, page 44	<p>While this site may have some ecological and amenity value, we question whether it "holds particular local significance" in accordance with paragraph 100 of the National Planning Policy Framework. It would appear to form one of many private gardens in the Redington Frogna/plan area, including some much larger gardens/ areas of backland, where local green space designation is not being proposed by the Forum. Also, controls over the removal of trees in conservation areas are dealt with by existing legislation and therefore any removal/works to trees can already be addressed outside of the neighbourhood planning process. Other proposed policies in the Neighbourhood Plan are able to deal with the general principle of loss of garden space.</p> <p>Given the presence of other wooded gardens, even in proximity to this site, it is difficult to see why this particular site is "<i>critical</i>" to the area's townscape and character as the table on page 37 refers.</p>	The local green space proposal should be deleted.
CF1, page 49	<p>A minor change to the first paragraph is needed as the criteria do not relate to extensions of existing community uses.</p> <p>The catchment for a replacement facility/service depends upon the nature of the community use. It is acknowledged that this catchment is likely to be local in character</p>	Applications for <u>a</u> change of use; adaptation or extension of a community facilities, including facilities to support home working will be supported, providing:

	<p>for most of the existing community uses in the Redfrog area but the diversity of community uses covered by CF1 suggests this may not apply in all instances.</p>	<ul style="list-style-type: none"> i. — ii. — iii. an alternative and comparable facility is provided in a suitable, nearby location within the neighbourhood.
<p>Policy FR, page 51</p>	<p>The Redfrog plan area includes 166-200 Finchley Road which also forms part of the Finchley Road / Swiss Cottage Town Centre, as designated by the Camden Local Plan. At the same time, these properties fall outside of the Redington and Frognal Conservation Area, although there is a possibility they may be included in future subject to consultation and engagement on a new draft Conservation area appraisal. The properties are also identified on the Council’s Local List. https://www.camden.gov.uk/local-list</p> <p>Some historic shopfront features remain, such as the original pilasters, however many of these shopfronts have been subject to a significant level of alteration over time. The Council strongly supports the aspiration that higher quality shopfronts are installed and the desirability of shopfronts relating more successfully to the characteristic mansion blocks of which they form part.</p> <p>However, while the outcome envisaged by the policy is highly desirable, in practice it may be difficult to achieve across all types of scheme. Minor alterations to these shopfronts already benefit from permitted development rights. Easily reversing the present situation may depend on the comprehensive refurbishment of parts/whole of the series of mansion blocks, a possibility acknowledged by Policy RF7 of the Neighbourhood Plan or alternatively, a significant level of grant.</p> <p>Were the premises to be located within the conservation area, applicants may be able to successfully argue that the replacement of an ‘ordinary’ shopfront with a similar alternative is acceptable as the statutory test is one of preserving <i>or</i> enhancing the character or appearance of the area.</p>	<p>Historic shopfronts in Finchley Road must <u>should</u> be retained.</p> <ul style="list-style-type: none"> i. New shopfronts must <u>should</u> complement the Victorian or Edwardian character of the street and must include <u>with features such as</u> a shop window, doorway... ii. Shopfronts must <u>should</u> use a palette of materials <p>Delete criterion (iv) and renumber subsequent criteria accordingly.</p> <p>(The policy has no criterion (iii))</p>

	<p>We consider minor changes are needed to reflect the Council/Neighbourhood Plan’s scope for controlling such development. This might more closely reflect Policy D3 – Shopfronts of the Camden Local Plan which sets out an <i>expectation</i> that shopfronts should be a high standard of design (taking into account all the factors listed in a. to f.) and that “where a new shopfront forms part of a group where original shop fronts survive, its design <i>should</i> complement their quality and character. We note the word ‘should’ is already used under 4.26 – Application in the Neighbourhood Plan.</p> <p>Criterion (iv) is overly prescriptive and this matter in any case is likely to be addressed via criterion (i). We also consider the approach contradicts the supporting text in 4.26 which states “<i>The policy sets out the essential components of shopfronts to complement the Victorian and Edwardian character of the street, while avoiding being prescriptive on stylistic details</i>”.</p>	
<p>4.27.2, page 55</p>	<p><i>“Camden officers successfully argued that the requirement for car-free development applies only to cases involving demolition, paving the way for a development of two flats with eight off-street parking spaces (including four spaces within a basement) and a car lift”.</i></p> <p>As stated earlier in our response, neighbourhood plans should be positive, forward-looking documents and it is not their role to review/comment on previous applications or appeals. The current circumstances in which the Council applies its car-free policy are set out in Policy T2 of the Camden Local Plan with further detail on its application contained in Camden Planning Guidance: Transport (March 2019).</p>	<p>Delete this sentence</p>
<p>4.27.3, page 56</p>	<p><i>“Camden currently requires a staged approach to screening and scoping. However, the process assumes that the excavation and construction work will proceed according to plan. But, works have not always proceeded according to plan, and there are examples of harm caused to properties in Redington Frogna, as a result of recent basement excavation. The requirements adopted by the Royal Borough of Kensington and Chelsea, as set out in the Basement Supplementary Planning Document, are</i></p>	<p>Delete these sentences.</p>

	<p><i>appropriate, as a minimum, for the substantially, more complex, hydrogeological structure of the north-west slopes of Hampstead.”</i></p> <p>The inference here is that the Council’s planning controls have been responsible for damage to properties. We do not consider that the neighbourhood plan should include allegations or speculation.</p> <p>The document produced by the Royal Borough is supplementary guidance and does not necessarily form ‘requirements’. Policy A5 of the Camden Local Plan and Camden Planning Guidance on Basements (March 2018) were developed taking into account expert advice from Arup on the different hydrogeological conditions present in the Borough. We have also consistently sought to ensure that our planning policies align with best practice in managing basement development in London and do not agree with the characterisation that Camden’s policies are in some way weaker than RBK&C.</p>	
<p>Policy UD1, page 56</p>	<p>Criterion (iv): <i>“This includes ensuring that an underground stream or spring line is not diverted”.</i></p> <p>We consider that impacts on streams and springs is adequately addressed by the first sentence of this criterion. The second sentence is unnecessary, and potentially unreasonable, because it may be possible to create a channel allowing water to flow around the basement, meaning there is no adverse impact. This is likely to be particularly feasible where the land around a basement falls entirely within the applicant’s ownership.</p>	<p>Delete the second sentence of criterion (iv).</p>
<p>4.28.1, page 57</p>	<p>First paragraph: we consider the approach to be disproportionate and potentially unreasonable. Where a basement is 3 metres deep, 4x depth would equate to a study radius of 12 metres, yet the policy requires applicants to extend this to cover 20 metres. If the applicant is able to demonstrate there is no impact to a property 5 metres away, it does not seem appropriate for the 20 metre radius to be assessed. Rather, the distance assessed should be determined through the Basement Impact Assessment process.</p>	<p>Delete the first paragraph of 4.28.1.</p>

	<p>The paragraph is also misleading as it is not just vertical movement that can lead to damage. Horizontal movement can also be a key factor.</p> <p>The approach conflicts with paragraph 31 of the NPPF which states “....<i>policies should be underpinned by <u>relevant</u> and up-to-date evidence. This should be <u>proportionate</u>, <u>focussed tightly</u> on supporting and justifying the policies concerned...</i>” (our underlining)</p>	
<p>4.28.1 page 57</p>	<p>Paragraphs 4 and 5: there are not Burland scale <i>tests</i> as such. Rather it is a scaling system that identifies the risk of damage to properties from subsidence. We consider that the Neighbourhood Plan does not need to provide detailed advice on how the level on the Burland Scale is established. This is already addressed adequately by Camden Planning Guidance: Basements (March 2018) and relevant professional guidance.</p>	<p>Amalgamate the two paragraphs as follows: Burland scale tests and a <u>A</u> ground movement assessment, <u>which considers both groundwater and excavation induced movement,</u> will be required from the applicant, prior to the determination of the planning application. Applicants must understand that the Burland calculations relate to walls with no windows or doors, and judge accordingly when assessing the relevance of their calculations to nearby structures. Justification for the Burland Scale damage level assessment is also to be provided, where there are properties within the likely zone of influence.</p>
<p>4.28.1, page 57</p>	<p>Paragraph 10: We consider the text is insufficiently clear as it is unknown what extent the contours might cover. Also as stated above, horizontal as well as vertical ground movements can be relevant. We consider that this issue can be adequately addressed by our suggested amendments to paragraphs 4 and 5.</p>	<p>Delete this paragraph.</p>

	The approach is contrary to the National Planning Practice Guidance which states: “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications...” (Paragraph: 041 Reference ID: 41-041-20140306)	
4.28.2, page 58	<p>Paragraph 4, first sentence: There are a very small number of cases where it is possible for the BIA to be accepted without a site specific investigation. This phrase would no longer permit that. The extent of the BIA and the associated studies and investigations should always be determined on a site-by-site basis following screening and scoping. Therefore some room for leeway is required.</p> <p>The approach conflicts with paragraph 31 of the NPPF which states “....policies should be underpinned by <u>relevant and up-to-date evidence</u>. This should be <u>proportionate, focussed tightly on supporting and justifying the policies concerned...</u>” (our underlining)</p>	<p>For the BIA, it will be necessary to dig holes in the soil, inspect the soil below ground and identify the different soil layers, <u>except in exceptional circumstances where the BIA and associated studies show this is not necessary.</u></p>
4.28.2, page 58	Paragraph 5: Estimations of underground water movement will not normally be made by a structural engineer as they are not within their expertise. The paragraph also contradicts paragraph 4.7 of Camden Planning Guidance: Basements (March 2018) which requires a hydrogeologist (CGeol) for this aspect of the Basement Impact Assessment.	<p>The BIA is to include estimations of ground and underground water movements, including cumulative impacts, made by a <u>qualified structural engineer, to be prepared in accordance with suitably qualified professional as defined in Camden’s latest Basements Planning Guidance: Basements</u>, and based on ground characteristics provided by a qualified hydrogeologist. Both the engineer and geologist should be chartered.</p>
4.28.3 (iii) (b), page 58	As 4.28.2, paragraph 4 above. Soil samples may not always be required as part of the BIA.	Soil samples <u>where they are required</u> , including those near boundaries with neighbours...

4.28.3 (iii) (c), page 58	This repeats the final sentence of (iii) (b).	Delete and renumber subsequent criteria.
4.28.3 (iii) (d), page 58	Ground movement and groundwater flow calculations are not factual data and should not be in a factual report. They are analyses based on the evaluation of factual data.	Boreholes data, ground movement and ground water flow calculations must be included as part of <u>accompanied by a factual report that meets the Council's requirements.</u>
4.28.3 (ix), page 59	It is not the role of a neighbourhood plan to determine on the Council's behalf the qualifications of the independent assessor, although it is reasonable to make a recommendation. We note that in 2019, there were only 590 individuals on the RoGEP register in the whole of the UK out of many thousands of engineers and geologists.	Where the independent assessor is to be present at a planning meeting, it should be represented by an engineer of at least Specialist or, preferably, Advisor grade in the UK Register of Ground Engineering Professionals (RoGEP) <u>is recommended.</u>
Policy KR, page 62	<p>The reservoir is identified as part of the West Lawn Tennis Club (Ref. 235) in Camden's Local List, adopted by the Council in 2015. https://www.camden.gov.uk/local-list</p> <p>Paragraph 184 of the National Planning Policy Framework (NPPF) states that heritage assets should be "<i>conserved in a manner appropriate to their significance</i>".</p> <p>On assets included in a local list, the NPPF states that "<i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>". This is then reflected in paragraph 7.69 of the Camden Local Plan.</p> <p>In dealing with planning proposals, paragraph 190 advises that local planning authorities should draw on "<i>any necessary expertise</i>" "<i>when considering the impact of a</i></p>	Development must have no significant adverse impact on its architectural or historic interest of the structure, or on the <u>should respect</u> the contribution it makes to the special architectural or historic interest of the Conservation Area <u>and its identification by Camden Council on the Local List.</u>

	<p><i>proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".</i> Some investigation of the reservoir's heritage significance has been undertaken commensurate with its successful inclusion on the Council's Local List. Further principles that should be applied to the assessment of individual proposals are set out in paragraph 192 including the "desirability of new development".</p> <p>At the current time, it is not considered there is sufficient evidence to inform and support the level of protection envisaged by this policy, which is more pertinent to a listed building. An unknown, but potentially quite wide range, of different uses/schemes could be proposed in the future and the impact of these schemes on the significance of the reservoir will need to be tested, while being mindful that it is presently a 'non-designated heritage asset'. Consequently, further expert investigation is highly likely to be requested by the Council to understand the impact of an individual proposal on the locally listed asset.</p>	
5.0 first paragraph	202-204 Finchley Road (IDS9), in the Redfrog plan area, <i>is</i> identified in the Camden Site Allocations Plan.	The Plan does not allocate any sites for development, and Camden does not have any sites allocated in the Camden Site Allocations Plan.
Policy UD2	We support the approach which is generally in line with the Council's CPG on Basements (paragraphs 5.6 to 5.8). We understand that the policy is focussed on 'high-impact works' rather than any basement construction work but it is not entirely clear.	<ul style="list-style-type: none"> (i) High impact activities will be restricted to 9am till 5.30pm on weekdays. Delete (for repetition): At no time should there be any works on Saturdays, Sundays or public holidays. ... (ii) Deliveries and collections <u>involving these activities</u> must take place between 9:30am and 4:30pm.

Design Guidance, page 113	“Pedantic stylistic imitation” – it is not entirely clear what this means	We suggest “Poor quality pastiche...”
---------------------------	---	---------------------------------------

Triggs, Andrew

From: Linda Chung [REDACTED]
Sent: 15 August 2020 19:45
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Regulation 16 Consultation

I support the Plan and its proposals.

Its policies have been worked on and consulted over a long period of time.

The plan seeks to preserve and enhance the character of the RedingtonFrogna! Conservation Area. The plan will defend precious heritage and special features, and also provide guidelines that are essential to promote sustainable development for the benefit of all.

Linda Chung
[REDACTED]

Triggs, Andrew

From: linda lucas [REDACTED]
Sent: 07 September 2020 23:56
To: PlanningPolicy
Subject: Redington Frognal Neighbourhood Plan /Comments

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

TO WHOM IT MAY CONCERN – LONDON BOROUGH OF CAMDEN

I received an email regarding the proposed above Neighbourhood Plan. Thank you.

Having read through the Plan and supporting documents, I am in support of the Plan. It appears to be sympathetically aware of the area, its character, heritage, history, green spaces and the need to preserve this special neighbourhood for all the right reasons.

I especially support the designation of the copse behind no.17 Frognal, NW3, as a local green space (LGS6). Private garden space is so precious and important for all the reasons listed in the Plan, for both people and wildlife. The benefits of outdoor life and the comfort of nature that we have come to appreciate even more during this strange, unnerving time of Pandemic need to be preserved at all costs.

Close to the copse (LGS6) is Meridian House (Allied Irish Bank building), a potential redevelopment site. If this should ever happen, it is vitally important that any 'development' must not be of a height that would cause significant loss of light or increased shading to neighbouring properties, especially 17 Frognal and neighbouring houses, and gardens. And should also be in sympathy with the character of the area's Victorian and Edwardian buildings.

I hope this Plan will be given the consideration it deserves.

With best regards
Linda Lucas
Mrs.L.V. Lucas

[REDACTED]
Hampstead
London NW3 6AR

Triggs, Andrew

From: Ghazala Afzal [REDACTED]
Sent: 05 September 2020 13:54
To: PlanningPolicy
Subject: plan redington /frognal

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Camden Council
We support The Redington Frogmal Neighbourhood Plan available at <https://www.redfrogassociation.org/>
Thank you
Residents
Lord Khalid and Lady Ghazala Hameed, [REDACTED]

Triggs, Andrew

From: Mal Parker [REDACTED]
Sent: 16 July 2020 11:50
To: PlanningPolicy
Cc: Redington Frogna
Subject: Redington Frogna Neighbourhood Plan [RFNP]

Follow Up Flag: Follow up
Flag Status: Completed

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Camden Council

I write in support of the proposed Redington Frogna Neighbourhood Plan [RFNP], having lived generally in the area since 1975 and specifically in the same house within the RedFrog area since 1984.

I refer specifically to the guidance for Neighbourhood Plan set out on the Ministry of Housing, Communities & Local Government web site, which states at the outset that -


Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.

Having extolled the virtues of redevelopment and renewal all of my professional life of some 40+ years I am sad to see what such an ethos, in the wrong and powerful hands, does to an area of uniqueness, and Redington Frogna is no exception. The uniqueness comes out of the aims and ambitions of myriad inhabitants of the area through the ages, wherein local-ness and organic growth were not controlled by an over-arching and remote authority but by the wishes, whims, and energies of local people for whom societal strictures demanded responsibility for all and any change within their neighbourhood.

I have, therefore, no hesitation in supporting the aims and ambitions of the RFNP that is before you, and urge you to adopt it so that what makes Redington and Frogna unique remains so and is thereby fully protected.

Mal Parker
Director

 DUNTHORNE
PARKER
ARCHITECTS


E mal.parker@dunthorneparker.co.uk
W www.dunthorneparkerarchitects.co.uk
A Unit LMLF.2.6, The Leather Market,
Weston Street, London, SE1 3ER

Triggs, Andrew

From: Margot Schiemann [REDACTED]
Sent: 25 July 2020 15:55
To: PlanningPolicy
Subject: Neighbourhoodplan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden,

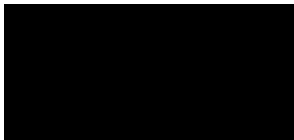
Thank you for the information about the Neighbourhood plan which I have reviewed.

It seems to me that this plan aims to be respectful of this valuable conservation area while being thoughtful to incorporate appropriate plans for re development.I would like to back up the listing of the copse behind 17 Frogna1 (LSB5). It would have significant negative impact on this environment if planning permission would be granted. This cope has been a natural environment for many years and has been a home for wildlife, for many birds and bats.

Kind regards

Margot Schiemann

Co Director of 17 Frogna1 Ltd



Triggs, Andrew

From: Max Izen [REDACTED]
Sent: 07 September 2020 09:47
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Completed

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To the Planning Committee

Dear Sir

I write in support of the proposed Reddington Road Neighbourhood Plan.

Yours sincerely, Max Izen
[REDACTED]

Triggs, Andrew

From: Michael Hibbs [REDACTED]
Sent: 24 July 2020 11:51
To: PlanningPolicy
Subject: Comment on RedFrog Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden

Thanks for sending me an email about the Neighbourhood Plan.

Having reviewed the plan in detail, I fully support it. I feel it strikes the right balance between ensuring those things that are so special about this area can continue, and be reinforced, whilst at the same time making practical suggestions for potential redevelopments where these will enhance the environment.

In particular I support the listing of the copse behind 17 Frognal as Local Green Space (LGS 6) – this particular area has been subject to enough incursions into the natural environment already and very much needs to be protected from further development.

Kind regards.

Michael Hibbs
[REDACTED]

Triggs, Andrew

From: Mitesh Modi [REDACTED]
Sent: 07 September 2020 08:54
To: PlanningPolicy
Subject: Proposed Redington Frogna! Neighbourhood Plan -registering my support

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Hi

I am writing to express my full support for the Redington Frogna! Neighbourhood Plan .

[REDACTED]

If you require anything more from me let me know.

Regards.

Mitesh Modi

This email has been scanned for email related threats and delivered safely by Mimecast.

Triggs, Andrew

From: Mojgan Green [REDACTED]
Sent: 10 July 2020 11:15
To: PlanningPolicy
Cc: Mojgan Green
Subject: Comment/Redington Frogna! Neighbourhood Forum plan/ may 2020

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Camden Planning Policy Unit

Re: Comment/Redington Frogna! Neighbourhood Forum plan(RFNFP)/ may 2020 submission

I read the above RFNFP with interest and found it to be a comprehensive set of policies;

Which may benefit our unique area immensely and would conserve and protect the Conservation area for future generations.

Mrs M Green

Triggs, Andrew

From: Humphreys & Co. <lawyers@humphreys.co.uk>
Sent: 02 September 2020 12:49
To: redfrogemail@gmail.com
Cc: Triggs, Andrew
Subject: Draft Redington Frogna! Neighbourhood Plan Draft Policy BGI 4 Local Green Spaces Site LSG 6 (formerly LSG 8) – Land rear of 17 Frogna!, London, NW3 6AR
Attachments: H&Co. to Redington Frogna! - 02.09.20.pdf; Statement of N Sofroniou.pdf

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

TM/12080/1/tm

02 September 2020

Redington Frogna!
Neighbourhood Forum

BY EMAIL ONLY: redfrogemail@gmail.com

Dear Sir/Madam

Draft Redington Frogna! Neighbourhood Plan
Draft Policy BGI 4 Local Green Spaces
Site LSG 6 (formerly LSG 8) – Land rear of 17 Frogna!, London, NW3 6AR

1. We write on behalf of Mr N Sofroniou, in connection with your proposal to designate our client's site LSG 6 on land to the rear of 17 Frogna!, London, NW3 6AR as Local Green Space under draft Policy BGI 4 of the draft Redington Frogna! Neighbourhood Plan. The policy proposes to protect Local Green Spaces from development, which will only be permitted in 'very special circumstances'.
2. You will recall that we first wrote to you on 30 July 2018. Since then you have published the Redington Frogna! Neighbourhood Plan Submission Version dated May 2020. We set out below our revised objections, which we have reviewed in the context of this latest Submission Version of the draft Neighbourhood Plan.
3. We retain object to the designation of our client's site LSG 6 for the reason that it does not meet the criteria for designation, having regard to the provisions of the development plan and national planning policy.
4. We would draw your attention first to the Introduction to the adopted Camden Local Plan 2017. This sets out the challenges the borough faces. If a lack of open spaces were considered to be one of the challenges faced by the borough, we would expect this matter would to be raised here. Instead, it is clearly stated at paragraph 1.30 that Camden has numerous parks and open spaces, which contribute greatly to the attractiveness of the borough. Whilst noting that growth and change must respect the character, heritage and distinctiveness of Camden's

value and special places, there is no reference here to any identified need to designate significant new areas of public open space.

5. Similarly, Local Plan Policy A2 sets out various measures for the protection of existing areas of designated open space, which should be safeguarded from development unless certain exceptional circumstances can be shown to apply. Developer contributions may be sought for new and enhanced open space to ensure that development does not put unacceptable pressure on the borough's existing open spaces.
6. However, there is no expectation that significant new areas of open space will be designated during the plan period except where these are necessary to meet the needs of new development.
7. Therefore, whilst it may not be inappropriate to consider whether new areas of open space are suitable for designation, the adopted Local Plan does not identify an over-riding need for new areas of public open space during the plan period.
8. It is also worth noting the supporting text at paragraph 6.48 of the Local Plan, which sets out the approach to be followed where new open space is to be provided through developer contributions. Such spaces should take account of the site characteristics and the local context, including existing street patterns and pedestrian access, so that new open spaces are easy to use, safe and secure and effectively managed
9. We are, of course, aware of the approach set out in paragraph 99 of the National Planning Policy Framework, which allows local communities, through local and neighbourhood plans, to identify for special protection green areas of particular importance to them.
10. However, paragraph 99 of the Framework goes on to state that the Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance (for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife); and where the green area concerned is local in character and not an extensive tract of land.
11. You argue that our client's site LSG 6 holds special value as area of attractive visual amenity, preserved trees and biodiverse commuting, foraging and nesting habitat. You describe it as having local character as the last remaining woodland behind Finchley Road. As such, you argue it is critical to the area's verdant townscape and character.
12. However, in our opinion, there is limited supporting evidence to substantiate these claims. The Framework states that the green area must be demonstrably special to the local community and hold a particular local significance (for example because of its beauty, historic significance or recreational value). However, this site is neither of exceptional beauty nor of any historic significance.
13. Although the site contains a number of protected trees, these were assessed on behalf of our client as part of a comprehensive site assessment by Cherryfield Ecology in 2019. This found that many of the trees were in poor condition, with only one specimen having any potential value for bat roosting. This tree was subsequently the subject of an endoscope survey but no bats or evidence of bats using the tree were found. No evidence of badgers was found and the potential for use of the site by badgers was found to be negligible. Neither were any breeding birds or evidence of breeding bird use found. No evidence was found of use of the site by amphibians, reptiles or other species, such as dormouse. The potential of the site for such use was likewise considered to be negligible.

14. This provides detailed and compelling evidence that directly contradicts your claim that our client's site LSG 6 has any special value as area of biodiverse commuting, foraging and nesting habitat. On the contrary, the evidence shows the site to have poor biodiversity and, in the majority of cases, negligible potential as suitable habitat.
15. We note that you no longer agree the site is valued for its peaceful backdrop to nearby gardens and for shielding views of buildings on Finchley Road, filtering noise and air pollution from Finchley Road and thereby increasing the sense of tranquillity in Froggnal gardens. This only reinforces our firm view that the amenity value of this site has been misunderstood and exaggerated from the start.
16. The fact of the matter is that our client's site LSG 6 is in no way demonstrably special to the local community, whilst its visual amenity value is confined to distant views from a limited number of private properties in the wider area. From these vantage points the site is merely part of a wider backdrop of trees. It therefore seems to us that the site has little or no community value and at best limited local significance. It is, moreover, difficult to see what significant public benefit would accrue to the local community by designating such a small parcel of privately owned, public inaccessible land as Local Green Space. Indeed, it would be unlikely to qualify as a suitable area for public open space under Local Plan Policy A2, as it is not well related to the established street pattern, is not easily accessible and lacks any public pedestrian access.
17. In closing, we would remind you that the adopted Local Plan does not identify a need for significant new areas of public open space. Furthermore, paragraph 99 of the Framework makes it clear that Local Green Space designation should only be used in very limited and specific circumstances. It follows that proposals for designation must be carefully and critically assessed and should only be confirmed where the relevant criteria are met in full.
18. With respect to our client's site LGS 6, we can only conclude that the relevant criteria are not met.
19. There is no compelling evidence to suggest that this small, privately owned and publicly inaccessible site is demonstrably special to the local community, whilst its amenity is limited by the lack of public access and its position some distance away from significant public vantage points. It has no public recreational value or potential, and its designation as Local Green Space would, in our opinion, deliver no appreciable community benefit.
20. We trust the Redington Froggnal Neighbourhood Forum will review its proposal to designate site LGS 6 in light of our objections.
21. We consider that there is no justification for its inclusion within draft Policy BGI 4 of the draft Redington Froggnal Neighbourhood Plan. For the reasons set out above, we therefore ask the Forum to delete site LGS 6 from the draft policy and amend the draft plan accordingly.
22. We further enclose a statement prepared by our client which sets out some of the inaccuracies on which the proposed inclusion of his land seems to be based.
23. We trust you will give full weight to our objections and thank you in advance for your time and consideration.

Yours faithfully

Humphreys & Co.

Enc

cc: by email to andrew.triggs@camden.gov.uk

I strongly reject to my land being made a Local Green Space as it doesn't meet the requirements:

1. It is not a place of Natural Beauty.
2. It is not a place of Historic Importance.
3. It is not or ever has been a place of community gathering or public use.
4. It is a privately owned piece of land.
5. We have the most amazing Local Green Spaces in walking distance large & small to suit anyone's needs.

I have supporting information & image for that mentioned above but first some incorrect information about my land.

Incorrect information about my Land

1. Incorrect information of images of copse.

Images of Copse in the submission papers of Redington Forum are not part of my land but neighbouring gardens.

Key:

Red Marks my Land the far Rear of 17 Frognal

Purple Marks the back garden of 17 Frognal

Blue Marks the back of 19 Frognal

Yellow Marks the far back left side car park of 202 Finchley Rd





Image below taken from my side of the Rear garden of 17 Frognal looking toward the garden of 17 Frognal



2. Incorrect information about losing all copse or a number of trees.

As no healthy tree will be removed and any tree removed will be replaced with a higher grade of tree for a longer life span. Only 1 & 1/2 mature trees are planned to be removed T5 & T6 which where recommend as unhealthy and low grade and will be replaced to the right boundary side at each end of the land.

As I would of like to keep all the mature trees but as advised by the tree specialist that they where not very healthy and by removing these two trees and replacing them with higher grade trees it will ensure we have trees here for a long time maybe 50+ years.

Image 1 of T6



Image 2 of T6



Image 3 of T6



Image 1 of T5 witch has been reduced by half due to Safty



Image 2 of T5



Image 3 of T5



Image 4 of T5



Image 5 of T5



Image 6 of T5



Image 7 of T5



Image 8 of T5



Image 9 of T5



Image 10 of T5



Image 11 of T5



Image 1 of T7 which has been removed and will be replaced



Image 2 of T7



Image 3 of T7



Image 4 of T7



I will be renewing the life with new trees and look after them they will be my trees and will be maintained by me.

3. Incorrect information about wildlife such as Bats & Black Squirrels.

As I have done biodiversity surveys no evidence of bats or Black Squirrels. Chery Field Ecology Report & Followup Endoscope Survey are attached but in their report T5 is T6.

4. Incorrect information about public access.

There is no suitable access for local community or public at all just my right of way along the side entrance of 17 Frognal.



5. Incorrect information about underground river is so very near by as London Underground Train Lines run beneath the land to the right side of my land.

The Orange Line in the image below indicates the underground Train lines to the left of my land.

Red Lines indicate the 2 Ends of my land



6. Incorrect information about losing or destroying the view of 55 apartments & 10 hotel rooms and office view.

No Trees to the left hand side of my land facing that direction will be touched at all the land / house will not be visible at all.

As you can see in image below there is many lines of tree before my land marked in red lines at each end I can't see them from my land so I don't think they can see me even Hampstead Gates small gardens are at a lower level to my land just like basement 1 level down & 2 up they are 3 floor and only has 1 window facing my land but is still screened off.



7. Incorrect information about peaceful backdrop for neighbouring gardens.

As my land is between two Car parks and past neighbouring gardens.
To the Left side of my land looking in towards No13-15 Frognal car park.



To the Right of my land looking towards 202 Finchley Rd / Allied Irish Bank
Car park



15. Incorrect information about my land it is barely or not at all visible from neighbouring houses with or without the two proposed trees been removed and replaced to give each other more privacy if any.

16. Incorrect information about filtering noise from Finchley Road buildings are 4 stories hi on Finchley Rd then you have the house behind them then Hampstead Gate work live buildings are 3 stories hi and is a culdesac of house on bought side then my land is 100ft long then 17 Frognal there gardens are 120ft long the nearest house in the direction of my land to Finchley Road Is approximately 440ft away shown in image below. They get more noise from passing traffic from Frognal.

17. Incorrect information about the last remaining woodland behind Finchley Rd. As you can see In the image below there are many Copse or so called woodland behind Finchley Road my land marked with 2 Red Lines at each end.



My land marked with Red Pin.

Why my land does not meet the requirements of Local Green Space.

Does this look like a Woodland and with large Copse.
View looking towards 17 Frognal



View looking towards Hampstead Gate.



1. It is not a place of Natural Beauty.



A Disused Bungalow in 202 Finchley Rd rear car park to the right of my land used as storage.



2. It is not a place of any Historical Importance.

3. It is not or ever has been a place of Community Gathering or public use.

4. Camden / Hampstead has one of the largest percentages 62% of Local Green Space.

9. In Walking distance of my land we have the most amazing Local Green Space such as:

Hampstead Heath
Kenwood
Golders Hill Park
Regents Park
Fortune Green
West End Green
Regrets Canal
Primrose Hill
Swiss Cottage open space
West Hampstead Hockey Club
Cumberland Lawn Tennis Club
Broadhurst Gardens Children's play area
Spedan Close Children's Play area
Downshire Hill Children's Play area
Whitestone pond
Hampstead Whitestone Garden
Judges Walk Green
Branch Hill (Frogal Rise (Allotments
Gospel Oak Lido
Hampstead Heath Extension
Hampstead Golf Club
Hampstead Cricket Club

Thank you
Mr Nicky Sofroniou

Triggs, Andrew

From: Nancy Mayo [REDACTED]
Sent: 30 July 2020 10:08
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Planning Policy,

I should like to express my wholehearted support and admiration for the aims of the Redington Frogna! Neighbourhood Plan.

Since the Conservation Area was first designated in 1985, local policies have utterly failed to preserve or enhance the area, leading to substantial harm. The policies of the Neighbourhood Plan are carefully thought out and tailored to the specific local needs. They will drive development in a sustainable manner without destroying the special features of the Conservation Area.

I also support the attempt to designate Local Green Spaces, which are all too scarce.

Yours faithfully,

Nancy Mayo
Redington Frogna! resident

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

24 August 2020

avisonyoung.co.uk

London Borough of Camden
planningpolicy@camden.gov.uk
via email only

Dear Sir / Madam
**Redington Froggnal Neighbourhood Plan Regulation 16 Consultation
June – September 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**

matt.verlander@avisonyoung.com
For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Date: 28 July 2020
Our ref: 320949
Your ref: Draft Neighbourhood Plan



Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

planningpolicy@camden.gov.uk



Dear Sir or Madam

Draft Redington Frogna Neighbourhood Plan

Thank you for your consultation request on the above dated and received by Natural England on 29th June, 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this draft Neighbourhood Plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Triggs, Andrew

From: NEVILLE FREED [REDACTED]
Sent: 04 September 2020 17:34
To: PlanningPolicy
Subject: Camden plan

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Writing in support of the plan

Kind regards
Neville Freed



Triggs, Andrew

From: nicole sochor [REDACTED]
Sent: 15 August 2020 14:24
To: PlanningPolicy
Cc: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Examiners at Camden Council,

I am a resident of Redington-Frogna! [REDACTED]
Over the years I have seen my neighbourhood eroded by developments that have been structurally damaging to adjacent homes and the unique character of the locale. I personally have fought a basement development plan by next-door neighbours which would have caused Burland Level Three structural damage to my home. I was forced to pay more than £50,000 in specialist and legal fees to fight - and ultimately win - the case. I can state definitively that Camden Council's current policy does not offer protection to residents whose home will suffer from subsidence and structural damage from basement developments. Whatever your planning department says about section 106 provisions these provisions offer no protection to innocent victims who consistently have to bear the externalised costs, material and mental, of development. Camden MUST have more rigorous requirements and protections.

I fully support the proposals of the Redington Frogna! Neighbourhood Plan (Regulation 16 Consultation). This plan recognises - in a way Camden has refused to acknowledge over the years - the damage caused by basement developments and other ill-considered construction and lays out measures to protect homes and the environment. The Plan is the result of extensive consultation with residents, exhaustive research and real concern by dedicated, civic-minded people who want to preserve our neighbourhood.

Please adopt the Redington-Frogna! Neighbourhood Plan.

Yours Sincerely,

Nicole Sochor

Triggs, Andrew

From: Oliver Froment [REDACTED]
Sent: 23 July 2020 15:07
To: PlanningPolicy
Subject: Attention: Planning Policies - Redington Frogna! Neighbourhood Forum Policies

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Subject: Redington Frogna! Neighbourhood Forum Policies

Dear Madam/Sir,

I am writing in my capacity as a local resident, as Chairman of the Camden Residents Association and Action Committee (CRAAC) and author of the Hampstead Neighbourhood Plan policy on Basements.

The Redington Frogna! area is characterised by the same complex hydrogeology as the adjoining Hampstead area. Redington Frogna! policies on Underground Development, Sustainable Development and Biodiversity and Green Infrastructure will enable development which does not cause harm and cumulative harm to Conservation Area character or to properties, trees and gardens in proximity to basement developments.

The inadequacy of the Camden Local Plan and the Basement Impact Assessment requirements has led to considerable damage being caused by basement development. This cannot be considered sustainable development. The Redington Frogna! Neighbourhood Plan policies on Underground Development, Sustainable Development and Biodiversity and Green Infrastructure will help to ensure that development is sustainable. These policies are strongly supported by Camden Residents Association and Action Committee.

Best regards,

Oliver Froment

Chair of CRAAC

The Camden Resident Association Action Committee "CRAAC" is composed of over 40 Resident Association and various groups covering most of the wards within the Borough of Camden. We are apolitical and aim to protect and preserve the amenity of residents against unsustainable developments

Triggs, Andrew

From: Peter Corner [REDACTED]
Sent: 05 September 2020 19:48
To: PlanningPolicy
Subject: Re: Redington Froggnal Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Madam /Sir,

I write to advocate and support the proposed Redington Froggnal Neighbourhood Plan.

[REDACTED]

In particular I would like to support policies covering the following:

Policy SD: Sustainable Development and Redington Froggnal Character. To ensure that new development complements and respects the existing character of the area and its heritage buildings. Buildings or features that contribute to that special interest (gaps between buildings, trees, hedges and the open garden suburb character etc.) will need to be retained.

Policy UD: Underground Development. The RedFrog area is situated on highly unstable soils with much underground water. To require rigorous site investigations and seeks to ensure that potential problems arising from basement excavation are addressed at, or before, application stage. It also aims to prevent water damage to nearby properties arising from the diversion of underground water features.

Policy BGI: Biodiversity and Green Infrastructure. TO adopt a green approach and aims to preserve the area's gardens and the Conservation Area's verdant setting. Open/unbuilt areas within development sites are to be designed to enhance their ecological, wildlife and residential amenity values.

Policy CF: Community Facilities. To retain existing community facilities and prioritises the provision of new facilities for uses such as culture, leisure, arts, tertiary education, studios, music, sport, meeting rooms, hot desks etc. These facilities are essential both to social cohesion and to the health and well being of people living and working in the area.

Policy FR: Finchley Road: Traditional Shopfronts. To adopt for Finchley Road's shopfronts heritage-led regeneration, including wide high-quality footways and trees and other greening measures. Community facilities to be envisaged. Working with Historic England to restore the heritage features of traditional shopfronts, so that the retail section of the Finchley Road streetscape can be revitalised, generating increased pedestrian flows.

Policy KR: Kidderpore Reservoir. The Victorian water reservoir is not protected, as it is neither listed nor on Camden's Local List. To require that development must have no significant adverse impact on the reservoir's architectural or historic interest and seeks to preserve the site for the community and also for nature.

Kind regards
Peter



Triggs, Andrew

From: Peter Smith [REDACTED]
Sent: 03 July 2020 15:41
To: PlanningPolicy
Subject: comments on Redington Froggnal Neighbourhood Forum

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Sir/Madam,

I'd like to express my general support for the above neighbourhood plan.

Additionally:

- The Plan is slightly disappointing in that it does not engage in a real issue which is car pollution in the Froggnal area. With numerous schools and small roads standing traffic is a regular feature of the area and very bad for the health of all (especially children and elderly). I would strongly urge that greater thought is given to encouraging electric vehicles and cycling. Specifically we need to have many more electric charge points along residential streets to encourage use of electric vehicles. A major problem for houses with no standing parking in their property is how to charge the electric vehicle at night without creating a hazard of a cable strewn across the pavement. I believe that street lamps can be converted to allow electric car charging and this should be a part of the plan.
- The Plan does not (and perhaps is not meant to deal with) the problem of cars driving through the area above the 20 mph speed limit. I am disappointed to say this is a regular sight. I live on Platts lane and every day I see cars speeding to and from the Finchley road along Platts Lane and elsewhere in Regington. I would like to see more signage on the road floor (which is less obtrusive) as to 20 mph. It might also make sense to introduce covered bike storage areas on some roads both as a traffic calming technique and to encourage the use of cycling (many house conversions which are flats do not have the space to store a bike).

Yours faithfully,

Peter Smith

Triggs, Andrew

From: Bob Hayim [REDACTED]
Sent: 14 August 2020 14:55
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom this may concern,

Regarding Regulation 16 Consultation, we support the Neighbourhood Plan, whilst the policies are far-reaching we believe that they would promote the sustainable development of the area and will both preserve and enhance the character of the Redington Frogna! Conservation Area.

Yours faithfully
Robert Hayim



Triggs, Andrew

From: Rupert Terry [REDACTED]
Sent: 30 June 2020 14:56
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I'm fully supportive of the above plan. Long overdue and much needed to protect this beautiful area.

Rupert Terry
[REDACTED]

Triggs, Andrew

From: Planning South <Planning.South@sportengland.org>
Sent: 30 June 2020 11:11
To: PlanningPolicy
Subject: Redington and Frogna1 Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

E: Planning.south@sportengland.org

PLEASE NOTE, Sport England offices are now CLOSED. We currently have no access for the foreseeable future due to Covid 19.

Please send any planning applications/strategic consultations & planning general enquiries via email only to:

Planning.south@sportengland.org

We will endeavor to respond within our usual timescales. We thank you for your patience.



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Louise Hartley, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

Triggs, Andrew

From: Fedele, Stefano [REDACTED]
Sent: 07 September 2020 18:43
To: PlanningPolicy
Subject: support to proposed Redington Frognal Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Camden Planning

Dear Sir/Madam, I am writing to express our full support to the proposed Redington Frognal Neighbourhood Plan.

The plan reflects years of work by dedicated members of the local area and local area groups, and we see it as a critical step to ensure preservation and enhancement of the special qualities of the Redington Frognal area.

We consider it crucial to ensure that new developments complement and respect the existing character of the area, and that rigorous assessment is performed for all potential basement excavations.

The area's gardens and related wildlife also must be preserved.

Other aspects of the plan are also of notable beneficial impact to the area, including the proposed policy on Finchley Road Shopfronts, community facilities and the Kidderpore Reservoir.

Many thanks for considering our supporting comments.

Stefano Fedele
Rosanna Aruta
[REDACTED]

Triggs, Andrew

From: Steve Frost [REDACTED]
Sent: 10 July 2020 13:19
To: PlanningPolicy
Subject: Redington Frognal Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Sirs

We have received the above consultation notice and plan.

We understand our building, 170 Finchley Road as well as the two ground floor shop spaces that we lease are within the scope of the plan to be acquired and turned into a luxury development.

We have been in occupation here since the early 1980's as a Chartered Accountancy practice bringing both employment and social benefits to the area and commercial benefits to the local small eateries and businesses with whom we and our employees interact.

We have invested recently in upgrading the front of the building to improve the road scene of the premises and take a very responsible attitude to waste. We believe we bring and will continue to bring important economic benefits to the community.

Indeed, it would also cost many hindered of thousands of pounds to relocate the business including the loss of employment for many local employees and would drove us further out of London.

Kind regards
Steve

This message and any attachments are confidential and may also contain legally privileged information. If you or any person acting on your behalf has received this message in error please notify the sender and destroy this message and any attachments immediately. Unauthorised dissemination, disclosure, copying or use is prohibited. Although we endeavour to keep our network free of viruses you should scan this email and any attachments for viruses. Fisher Phillips LLP shall not be responsible for any viruses contained in this e-mail or any attachments. We reserve the right to monitor the content of all e-mails sent and received by our systems. The partners accept no liability for the contents of e-mails where these are unconnected with the affairs of the firm or its clients.

Registered to carry on audit work in the UK; regulated for a range of investment business activities; and licensed to carry out the reserved legal activity of non-contentious probate in England and Wales by the Institute of Chartered Accountants in England and Wales. Fisher Phillips LLP is a limited liability partnership registered in England and Wales. Registered Number OC404664. A list of partners is available

on request.

This email message has been delivered safely and archived online by Mimecast.
For more information please visit <http://www.mimecast.com>

Triggs, Andrew

From: Susan Grossman [REDACTED]
Sent: 22 July 2020 22:55
To: PlanningPolicy
Subject: Neighbourhood proposal Redfrog

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Regulation 16 consultation.

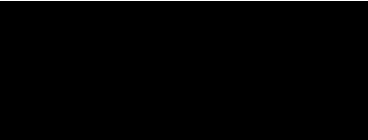
This is to confirm that as a resident of the neighbourhood group RedFrog I appreciate the attempt to designate local green spaces. I support that:

- WHLTC is designated an Asset of Community Value
- the tennis club and its grounds are the only green space available for exercise and socialising, in an area that is officially green-space deprived and where there are many flats with no outdoor space
- the retention of green spaces and trees is of even greater importance at a time of Climate and Ecological Emergency: <https://www.camden.gov.uk/climate-crisis>

I trust these views will be taken into account.

Yours sincerely

Susan Grossman



Triggs, Andrew

From: Sue Wyatt [REDACTED]
Sent: 06 September 2020 17:09
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I am writing in support of the Redington Frogna! Neighbourhood Plan. [REDACTED]
[REDACTED] In particular I am supportive of the following aspects of the plan:

that it recommends that new developments are appropriate for the existing character and heritage buildings of the area. In addition, that existing buildings or features such as gaps between the buildings, trees and hedges are retained.

Also as the area has a lot of underground water the policy requires proper site investigations for basement excavations and that the problems identified from these investigations are addressed, ideally at application stage.

It is also important to me that the plan values biodiversity and has a green approach, prioritising the area's gardens and the area's green landscape.

In the plan recommends that any development of Kidderpore Reservoir has no significant negative impact on its historic interest and that the site is preserved for nature. This is important.

Therefore, I support the plan.

Yours sincerely

Susan Wyatt

Triggs, Andrew

From: Tania Varsanyi [REDACTED]
Sent: 06 September 2020 23:31
To: PlanningPolicy
Subject: Redington Frogna! Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

I support the Redington Frogna! Neighbourhood Plan.
Tania Varsanyi
[REDACTED]

Sent from my iPhone



Sent by email: planningpolicy@camden.gov.uk

thameswaterplanningpolicy@savills.com



0118 9520 500

7th September 2020

London Borough of Camden – Redington and Frognal Neighbourhood Development Plan – Submission Version

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the London Borough of Camden and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the draft Neighbourhood Plan:

General Comments

Thames Water support the removal of LGS 2 (Tennis Courts to the rear of Windsor Court Platts Lane) as an area of Local Green Space.

Thames Water also supports Policy 7.2 (UD Underground Development and Basements) and paragraph 7.3.3 part vii which relate to basement development.

OBJECTION to the designation of Local Green Spaces – LGS 1

Thames Water have previously requested the removal of LGS 1 – West Heath Lawn Tennis Club – as an area designated as Local Green Space. West Heath Lawn Tennis Club is located on land owned by Thames Water (retained operational land) with a lease granted which runs until September 2022.

Thames Water retain its objection to the designation of this site as Local Green Space for the reasons set out in the previous response dated 5th August 2019. The site features in the Councils Local List (Ref: 235) for its Historical and Social Significance as the tennis club has operated from the site since 1902. However, the site is private land and is operated solely for the use by club members. Public access is restricted.

The site is located adjacent to Kidderpore Reservoir and is a secure site with only members of the tennis club and Thames Water as the land owner having rights of access. It is understood that the tennis club currently has membership of around 140 with non-members only able to play at the club accompanied by members and then only on a limited number of occasions each year. The lease agreement with Thames Water requires the tennis club to not allow any persons other than the lessee’s members, servants, agents, workmen and invitees to enter upon the said land for any purpose whatsoever.

The site is not a green area that is demonstrably special to the local community and as such a Local Green Space designation is not considered appropriate. This is set out with respect to the designation criteria identified in the NPPF, as follows:

Recreational Value

While the site is leased to a tennis club it is a private members club with limited membership which does not provide facilities for the wider community. As set out above public access to the site is restricted with the site gated and secured. Consequently, in terms of the sites recreational value, the site is not considered to have sufficient value to warrant a Local Green Space designation.

Historic Significance

The land contains three grass tennis courts and two hard courts together with a small pavilion building and lies adjacent to the Kidderpore Reservoir which was reconstructed through the provision of a replacement roof structure in 2013.

The site lies within the Redington/Frognaal Conservation Area, the Conservation Area Statement states that the Tennis Club is identified in the UDP as a Private Open Space situated either side of a covered reservoir.

Thames Water does not consider that the heritage value of the site is sufficient to warrant a Local Green Space designation particularly as the site is also designated as part of a Conservation Area and is also designated as **Private** Open Space in the Camden Local Plan.

Beauty and Tranquillity

Given the location of the tennis club adjacent to an existing service reservoir and that half of the site is covered by hard tennis courts, it is not considered that the site is sufficiently beautiful or tranquil to warrant designation as a Local Green Space.

Wildlife

Habitat on the site is limited with the site mainly covered by three grass tennis courts and two hard tennis courts. Consequently the site is not considered to be of particular local significance sufficient to warrant a Local Green Space designation.

Endurance

In addition to the criteria set out above, the NPPF (paragraph 99) requires that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. The current lease expires in 2022 and as such there is no certainty that the land will remain available beyond the end of the plan period. Consequently the site should not be designated as Local Green Space. The site is adjacent to the Kidderpore Reservoir, and previous attempts to designate as an Asset of Community Value have failed due to the land being retained “operational land” which may be required in the future as part of Thames Water’s statutory undertakings.

Thames Water retain its objection to the inclusion of the site as Local Green Space in the emerging Neighbourhood Plan for the above reasons.

Site Specific Comments

The information contained within the new Neighbourhood Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.

The attached table provides site specific comments from a desktop assessment on sewage and water supply infrastructure.

Early engagement between the developers and Thames Water would be beneficial to understand:

- Water supply requirements;
- What drainage requirements are required on and off site;
- Clarity on what loading/flow from the development is anticipated.

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Wastewater/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.

Thames Water offers a free pre-planning service where developer can engage with Thames water to understand what if any upgrades will be needed to serve the development where and when: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.

Yours sincerely,

Thames Water Utilities Ltd

Site ID	Site Name	Water Response	Waste Response
66296	RF 12: Row of Ten Garages at Studholme Court	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.
60157	RF2: Conrad Court, 27 Redington Gardens, London, NW3	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

60158	RF3: 1 Platts Lane, London, NW3 7NP	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.
60159	RF4: Garages on South Side of Frognal Lane, London, NW3	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.

60161	RF6: Hampstead Gate, 1A Frofnal, London, NW3	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.
60162	RF7: R/O 166-200A Finchley Road and Adjacent to Hampstead Gate	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

60163	RF8: 282-284 Finchley Road, London,NW3	On the information available to date we do not envisage infrastructure concerns regarding the water supply network or treatment works capacity in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
-------	--	--	--

60156	Site reference RF 1: Meridian House	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>
-------	-------------------------------------	---	--



planningpolicy@camden.gov.uk

[by email only]

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

26th August 2020

Dear Sir/Madam,

Re: Redington and Frognal Neighbourhood Plan Reg. 16 Consultation

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).

Thank you for giving Transport for London (TfL) the opportunity to comment on the 'Redington and Frognal Regulation 16 consultation' Neighbourhood Plan.

The Intend to Publish version of the London Plan (December 2019) sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. TfL expects all current planning proposals to consider the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

TfL's interests in the Neighbourhood Area (NA) are varied, and include:

- A41 Finchley Road, which forms part of the Transport for London Road Network (TLRN) and for which TfL is the highway authority
- Numerous bus stops, served by a number of key inner London bus routes
- Finchley Road and Frognal Overground Station, a gateway from the south
- Cycle and pedestrian safety to support the Mayor's 'Vision Zero' target of zero deaths or serious injuries (KSI) on London's roads by 2041
- Healthy Streets agenda

TfL previously responded to the draft Neighbourhood Plan on 23 January 2019 and 5 August 2019. Our previous comments are still applicable and you should continue to take them into consideration. However the latest Neighbourhood Plan draft has clearly addressed many of our previous suggestions and requests, which is very much appreciated.

Generally, the transport related policies in the 'Revised Draft Redington and Frognaal Neighbourhood Plan' (RFNP) are supported, as they align well with the draft London Plan (DLP), Mayors Transport Strategy (MTS) and our Healthy Streets and Vision Zero approaches to planning and transport in London. In particular TfL is supportive of Policy SD 3 requiring car-free development in the Neighbourhood Plan area.

We hope the comments above are helpful. Please do not hesitate to contact me if you have any further queries.

Your sincerely,

Josephine Vos | Manager – London Plan and S106 Obligations Team

Email: Josephinevos@tfl.gov.uk

Triggs, Andrew

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 16 July 2020 09:05
To: PlanningPolicy
Subject: FW: Notice of receipt of a proposed Neighbourhood Plan - LB Camden

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Whom it may concern.

Proposed Neighbourhood Plan

We have been notified of the proposed Neighbourhood Plan.

London Underground has no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.

Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.

Comments will be provided at planning application stage.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

Shahina Inayathusein MAPM MIAM
Safeguarding Engineer (LU+DLR)
Infrastructure Protection -TfL Engineering
Email: locationenquiries@tube.tfl.gov.uk

Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

From: Camden Council [<mailto:CamdenCouncil@public.govdelivery.com>]
Sent: 29 June 2020 13:39
To: CRL_Safeguarding
Subject: Notice of receipt of a proposed Neighbourhood Plan

Dear Sir / Madam,

Notice of receipt of a proposed Neighbourhood Plan

Redington Frognal Neighbourhood Forum has submitted its proposed Neighbourhood Plan to Camden Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are now consulting residents and interested stakeholders on this proposed Plan.

How does this affect me?

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including sustainable development, biodiversity, community infrastructure, shopfronts and basements. It also identifies sites to be designated as 'local green space'.

The Neighbourhood Plan, if approved, will be used, alongside the Council's policies when making planning decisions in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan - the 'neighbourhood area') and for further information on how to respond to this consultation please go to:

www.camden.gov.uk/neighbourhoodplanning - see 'current consultations'

Comments must be received by **Monday 7th September 2020** and should be sent via e-mail to planningpolicy@camden.gov.uk or post to:

Planning Policy
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1H 9JE

If you are unable to access the documents on the internet or make representations online, please contact us on 020 7974 8988.

What happens next?

Once the consultation has finished, the Council will forward the responses and the Neighbourhood Plan to an independent examiner. The examiner will assess whether the Plan meets the statutory requirements. If the Plan passes the examination, a referendum will be organised to give the community the final say on whether the Plan is to be used in determining planning applications in the designated neighbourhood area.

Due to the pandemic, there are currently some alterations to how neighbourhood plan examinations and referendums will work. For further information, please see the Government's website:

<https://www.gov.uk/guidance/neighbourhood-planning--2>

If you have any further queries, please do not hesitate to contact us:

[Unsubscribe](#) or [manage your Camden Council email subscriptions](#).

This email was sent to safeguarding@crossrail.co.uk using GovDelivery Communications Cloud on behalf of: London Borough of Camden · 5 Pancras Square · London · N1C 4AG



The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error, please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.

Triggs, Andrew

From: Ginny Kirsch [REDACTED]
Sent: 14 July 2020 18:31
To: PlanningPolicy
Subject: Redfrog Regulation 16

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Madam / Sir

I am writing to express my support for the policies recommended in Regulation 16 of the Redfrog Neighbourhood Plan.

The area's proximity to Hampstead Heath means preserving the neighbourhood's heritage, history and character benefits not only the residents of Hampstead but also to the wider community who visit the Heath.

With best regards

Virginia Kirsch