

## **HAMPSTEAD CONSERVATION AREA ADVISORY COMMITTEE (HCAAC)**

Advises London Borough of Camden on planning applications. Brings together representation of residents associations in Hampstead area.

### **LONDON PLAN COMMENTS**

HCAAC has long-established views on development matters especially those dealt with in the DLP and we draw on submissions by various bodies and individuals listed in abbreviations below.

We note LBC is not obliged to comment on the DLP but does so and we agree with its submission.

### **Abbreviations**

CPRE – Council for the Protection of Rural England

LBC – London Borough of Camden

DLP / NLP – the current Draft London Plan.

FALP – (CPRE) the former Alterations to the London Plan.

HHS – Heath & Hampstead Society

RfNF – Redfrog Neighbourhood Forum

HCAAC – Hampstead Conservation Advisory Committee

CCAACs – Camden Conservation Areas Advisory Committees Group.

### **HOUSING**

DLP calls for assessment for development of any site having 'available' land. Intensification & Optimisation are considered to increase sites' use and densities defined ad hoc per site.

Brownfield sites are mentioned but are these considered separately from other small sites.

LBC not obliged to have own housing targets, but acknowledges DLP aims and aligns with own targets.

The DLP should allow for more feasible targets especially for Affordable Housing. Control for this should be robust and not susceptible to dilution by developers pushing for or councils accepting 'provision elsewhere'. (David Milne)

Welcome offer of units to Londoners before marketing elsewhere. Requires Parliamentary action ?

### **Small housing sites**

H1 C – is permission in principle separate from brownfield sites review. This should not apply as a blanket policy to all small sites.

Sites allocation important – how will Camden allocate sites in Hampstead and Redfrog? These are tightly-developed or well-landscaped areas. In the latter case, site 'optimisation' or 'intensification' threatens the character of heritage assets and their settings which are unique as a green resource in North London..

## **HERITAGE**

Heritage policy HC1 para B3 re integrating innovative etc. schemes into heritage settings. Dangerous allied with 'suitable sites' 'intensification' 'density' means Redfrog and some Hampstead sites highly vulnerable to harmful development with developers looking both to over-develop sites and re-define 'harm' threatened to CAs

B4 also continues the thread. Benefits, economy etc. In NPPF terms this is a killer. Even the NPPF doesn't spell out heritage treatment in so clear a way as to threaten our sites.

Check NPPF heritage etc. – CAs.

CA statements don't protect if developers can prove their designs are worthy. Such considerations become 'planning matters' where 'aesthetics' do not much figure. The London Plan needs to persuade LPAs of the desirability of full appreciation of architectural quality in new schemes and protection of heritage.

## **Green Infrastructure**

HCAAC is concerned for all CAs about green infrastructure and bio-diversity and their diminution and threat in our CAs. We hope the DLP will act to reverse this trend and hope that LBC will be able to base more pro-active protection and expansion of green areas and issues than the current local plan appears to make available.

We welcome the stated aim to increase green cover with consent for development. In particular we wish to see the end of front gardens paved over for off-street car parking, then the insertion of inappropriate railings and gates purely for protection of high-value cars.

MOL protection is a current issue for Hampstead and we do not welcome the demotion of this issue to be open to 'Provision elsewhere'.

We support the submissions from CPRE and Redfrog Neighbourhood Forum.

Welcome offer of units to Londoners before marketing elsewhere. Requires Parliamentary action ?

Ditto compulsory purchase ?

Evolving character – changes – so what happens in the CAs ? This is a central consideration in these areas.

Retention of green space over-rides "underused sites".

Policy H2 – character will change over time.....to increase residential density.

Note the comments of London Borough of Camden where elements of the plan are seen as threatening to undermine our Local Plan.

Also those of CPRE for whom concerns about green space and pointing up differences between FALP and NLP. All CAACS would be concerned at the change from MOL protection to permissible land swaps. It is time to end the regrettable tendency for developers to propose and councils to accept 'provision elsewhere' wherein desires to maximise an area's potential is compromised by this get-out confusing and diluting the intention.

Comment by David Milne and others has also suggested a review of housing targets where figures from GLA sources suggest unlikely recent increases in immigration and need for large number of additional dwellings. Noted, however, that LBC appear to agree with their target figure exceeding the DLP. Contributions to this from CAs is known to be limited, both as to available or even aspirational sites

Comment also adds this to issues of funding where both the GLA and local councils are known to be cash-strapped with the current central government reportedly determined to reinforce austerity budgets going forward.