

This is my written submission for the hearing commencing 19 May, 2027 concerning Site Allocation C27...Land Adjacent to Constable House for Gypsy Travellers' pitches.

As requested I am responding to the Matters, Issues and Questions in the documents you provided and with the information provided in the Examination files and library.

I have previously submitted a Representation statement on behalf of Constable House residents which was compiled as a result of my door to door survey and conversations with the residents of 58 of the 63 homes of Constable House. I hope you refer to this.

As you requested in your email to CH residents, I will not replicate those statements. However, I will expand on some of those statements when relevant and in light of statements discussed in the Matters, Issues, Questions.

I have lived at Constable House for almost 30 years. I have lived in the Belsize Park/ Chalk Farm neighbourhoods for 36 years. I am 'a local' and have a history with and experience of the area, my neighbours and community. I hope you will benefit from my detailed local knowledge, expertise and perspective.

Matter 1/684

Matter 1:

2: The Council's management of Constable House (CH) has had a big turnover of staff the past several years, and too it has at times been rather lax, and for a time we were without a Housing Officer. Neglect of the building and grounds is evident.

There has not been consistent management.

Questions:

Who in CC was originally consulted about this site? Did this person have appropriate knowledge of the estate and its history and future plans, when the initial consultation looking for appropriate/ eligible sites took place?

Was an actual site visit done to determine if the area was indeed available, acceptable, suitable, practically feasible?

I think this is key because at the time this site was being considered, the area had been (still is) 'temporarily closed', locked. And, it has remained closed off for use as a result of CC not dealing with the initial problem; they have simply ignored it. And then it seems it was forgotten by the housing officer(s) and subsequent lack of a person in post. The area has, as a result, fallen into disrepair due to CC negligence.

According to the 'Suitability Consideration' comments in the TPO4 document, this "unused" state/ condition of the area is now evidence of, and a "positive' reason for its suitability for the Traveller's pitches.

( Please see the attachment above for the Topic Paper- TPO4 document.)

I personally called Camden Council (CC) several times over the past years asking for the area to be reopened. And enquiring as to why it remained locked. As have other residents.

I asked what was being done? I never got replies.

To substantiate this neglect ....it is important for you to know that another area on the estate was closed off at the same time due to the same problems. The front entrance of the building, off Adelaide Rd., was blocked up with wooden boards. This too we were told was temporary. It is still boarded up. Years later, nothing is being done. No-one from the Council seems to deem it important to remove the boards and re-establish our front entrance. I think no-one has been here to even notice.

This makes me seriously question the procedure and process of the consultation and information given in the very early preliminary stages.

Why is this locked amenity play area and our front main entrance locked/ boarded up? And why for years?

Simply put....Did the consultation with Council management and subsequent allocation of this area fail to know what they were talking about? Why didn't anyone ask why the area was locked? Why didn't anyone ask why it was allowed to fall into disrepair?

And why didn't anyone consider how this locked area effects/ affects CH residents? We don't use it for play, or vegetable gardens BECAUSE CC management has locked us out of our own amenity space.

The TPO4 makes it sound as though it's an under utilised area, a not wanted space, and not used by the children and families and adults who live here. This is blatantly not true. The 'unused' term is a gross misrepresentation of the real situation. We want this space for our use.

When I surveyed the residents last year, more than 75% of the residents initiated conversations voicing their desire for that area to be unlocked and redeveloped for CH residents' use into a vital, vibrant amenity, green space. There are so many young families here and the older children need a place to play that is not the car park, dodging vehicles. Adults would use an outdoor gym and everyone spoke of growing vegetables and outdoor seating areas.

These are key issues and questions to answer in this hearing.

Matter 2:

5a, 5c,

It is not clear nor has justification been made evident how and why this preferred spatial strategy has been chosen and made.

The evidence needs to be presented. A clear description has to be given.

No consideration has been given to the impact on the CH residents nor the immediate neighbourhood.

There was no communication with CH residents before the C27 Allocation was made.

CH residents were not even informed about the Representation request or the Consultation period that legally has to be made public and run for a period of several weeks. We found out 1 week before the deadline. We found out by chance speaking with a neighbour who heard about it from someone else. According to what is stated in these examination and guidance, matters, issues and questions documents....This makes me question the transparency of process choice and compliance of legal requirements for public announcements, consultation etc.

Truly, if we had not accidentally heard about it from a 'neighbour' how would CH have ever known? Very importantly:

Why were CH residents never directly involved and informed?

Why were we not sent letters describing what was happening and being planned, including the consultation forms?

Was this legal?

Was this not a clear case of a dereliction of duty to Council tenants and leaseholders?

Matter 3:  
Issue 3:  
60

I question that the approach to the choosing of the site is sound and justified. I do not think they are. I question the processes and methodology used to identify the site.

Was an actual site visit conducted to physically measure and confirm the criteria for the pitches?

I have 2 main concerns:

A.

According to the Local Plan and regulations pertaining to travellers pitches... the criteria states the pitches cannot be overlooked.

Once again the TOP04 ( see attachment) 'Suitability Consideration' comments assume that enough shrubbery surrounding the site will suffice; that the shrubbery will "mitigate" this problem of being overlooked on 2 sides.

I disagree.

Firstly, the East side wall of the Constable House building is less than 2 metres from the fencing and low wall surrounding the proposed area. It runs parallel with the entire Western side/ edge of the allocated area.

The CH brick side is full of windows. It is 3 floors of flats. The flats' windows directly overlook the allocated area.

Both travellers and CH residents will be adversely and directly affected by the location of the pitches.

This physical proximity cannot be underestimated nor neglected as evidence that the site is unsuitable.

In addition, 2 separate blocks of flats - both higher than 4 stories - directly across the street on Eton College Rd, are on the Eastern side of the allocated area. Shrubby will not stop the pitches being overlooked by several flats. These flats are much higher than those living on the ground.

The site was not properly considered.

B.

What exactly is the geographical, topographical site/ physical area under consideration?

Documentation of the site plan, the actual maps and graphics provided has not been consistent throughout the whole process. Different studies, reports and types of plans contain different maps of the "designated" area.

The inconsistencies have caused considerable confusion and misinformation. Who is looking at which map to determine suitability?

During the consultation period in June 2025, I queried, via email, Rebecca Burden the Development Plans Manager, concerning the discrepancies I saw of the maps and graphics.

I asked her to confirm what exactly was being considered.

Her reply included: "The site allocation in the local plan is smaller than the site area identified through the Gypsy and Traveller Site Identification Study, and is confined to the area of hardstanding on the land adjacent to Constable House, and excludes the areas of green space to the front and the trees along Eton College Road."

However! The map of the allocated area under consideration for this Examination Hearing...the map that is provided in the documents in the Examination Library, shown in TOP04 ( see attachment) - the document currently used to determine suitability....shows the wrong space and incorrect accompanying text description.

It says, " The site comprises a self- contained area of hardstanding, with green space to the front."

This is in direct contradiction to what Rebecca Burden confirmed to me in June 2025. And too, it is not what Councillor Rebecca Filer recently confirmed to me (in her surgery), is the correct space. Both confirmed that it is just the hardstanding area and not the green space.

The fact that this map is incorrect at this point in the timeline is not only a worry but is a procedural problem. Why did this happen?

Inaccurate documents do not represent the correct measurements and size. Inaccurate maps present a distortion of scale. Inaccurate maps have no place in such a crucial report, especially when site visits are not made by all involved and decisions are made based on these incorrect graphics.

Therefore I question and doubt the evidence provided and the conclusion that the site is suitable.

Matter 9:

Issue 2:

As I stated above. CH residents want to re- establish the play area and create a vital amenity green space that includes a community garden. We are very aware of successful fruit and vegetable gardens on other estates and want to do the same. This area can easily be transformed to create a garden space that enhances both the 'Community Trees' plantings that were done last year as part of Camden's nature and environmental schemes; and the garden beds of bulbs and wildflowers planted a few years ago.

The greening of this hardsurface play area can be modernised to provide very needed outdoor seating areas for residents of all ages surrounded with raised bed flowers. The tending of the gardens brings community involvement and improves the quality of life.

Matter 10/684

Matter 10:

Issue 3:

C27 Allocation- 58-64

My previous remarks in the text above also serve to respond to these issues.

And, the Representation I submitted during the consultation period last year speaks to some of these issues as well, so I will not repeat. Please refer to that submission.

I look forward to watching the online hearing.

In the meantime please contact me if you require further information or have any questions.

Yours sincerely,  
Kim Jacobson