

EXAMINATION of the CAMDEN LOCAL PLAN 2025
JOINT WRITTEN STATEMENT
RESPONSE to MATTERS, ISSUES and QUESTIONS
RAISED BY THE INSPECTOR
RE. SITE ALLOCATION C27

Responders -	
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Mando Watson	14
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12.03.2026

OBJECTION to the Allocation of Land to the East of Constable House (C27) for a Gypsy and Travellers site

Context

Representation: This is a joint Written Statement submitted on behalf of residents in the neighbourhood who made representations/objections to Camden's Submitted Draft Plan 2025 regarding the allocation of land to the East of Constable House – Site C27. [Ref. Cover Page]

Representations were made seeking a modification to Camden's submitted draft Local Plan requiring the deletion of Site C27 (Land to the East of Constable House) from the Site Allocations schedule and related consequential amendments to Housing – Gypsy and Travellers Accommodation Policy 11 and submitted Main Modifications to this policy.

This Statement does not repeat the representations already submitted. Where relevant it may reference and summarise them. The aim is to provide additional support to the objections/representations made, having read the further material submitted by the Council and questions raised by the Inspector.

The Allocated Site C27: Lies to the east of Constable House, a 4/5 storey residential building of 63 dwellings. The land is used as open, green space/amenity area with an enclosed playground/kick about area for use by Constable House residents. The Council holds the freehold of the residential block and surrounding amenity and access areas.

It is a highly visible site close to Chalk Farm Station at the junction of Adelaide Road and Eton College Road. It lies in a dense built-up urban area with 6/7 storey residential blocks (existing and under construction) to the east and west of the site. South of Adelaide Road, 4 storey residential blocks/houses directly overlook the site, as does the Victorian housing to the north within the Eton Conservation Area.

The site is allocated for two Gypsy/Travellers pitches, the requirements of a single pitch being variously described in Council supporting documents to include – a 'static caravan', a trailer/touring caravan, car parking, associated amenities (including water supply and electricity), a 'basic amenity building' and access from the road of no less than 4 meters width.

The following paragraphs address the Inspector's Questions raised about the allocation of site C27 for Gypsy and Travellers accommodation.

SITE ALLOCATION C27

58. Is allocation of the site for Gypsy and Traveller use justified?

The allocation of C27 for Gypsy and Travellers [GT] accommodation has not been properly or reasonably justified. There has been no assessment of the impact of this use on the neighbourhood, the adjoining properties or the need for open green space and children's play areas. The criteria applied during the site selection process, to eliminate sites and shortlist others, have not been rigorously applied to Site C27. Important additional criteria re viability and deliverability have not been fully assessed in terms of availability, suitability and achievability. [Ref EB12 Section 2 Stage 4 [Sift Mapping]; EB13 Appendix F Site 1016. TP03 Section 4.]

There is no evidence that the following criteria have been fully assessed.

1. **Amenity Land within Housing Estates/Children’s Playgrounds**
2. **Overlooking**
3. **The impact on the local character of the area**
4. **Deliverability – Viability**
5. **Deliverability – Infrastructure Requirements**

1. **Amenity Land/Children’s Playgrounds within Housing Estates**

Land to the east of Constable House is amenity open, green space and playground for residents of Constable House. The playground area is unused through lack of maintenance, not through lack of demand or need. Currently there is a single piece of play equipment at the rear of the Estate adjacent to parking on the access road. See photo. This is no substitute for a properly laid out children’s play area, one which is both safe and secure.



The remainder of the site contains trees and wildflowers managed by the KoKo Foundation. It is unclear whether this green space will form part of the traveller’s site.

This neighbourhood forms part of the ‘Belsize’ area identified as **deficient in access to public open space and children’s play areas**. [Ref. *Camden Green Space Investment Programme 2026-2030 PDF 528KB*. See also Para 4 and Map of the accompanying report to the Culture and Environment Scrutiny Committee dated 15th September 2025.] We note that Estate regeneration projects are considered an important part of the Council’s strategy for improving open space and play provision in the borough through the Council’s Community Investment Programme (CIP). (TP06)

Furthermore, the Section 106 Agreement related to the 6/7 storey residential development currently under construction behind Chalk Farm Station (5-17 Haverstock Hill 2016/3975/P) and directly opposite site C27, required a contribution of £100,457 ‘to create/improve open space provision within the surrounding area’. The reason for this is because the development is in a densely built-up area which is ‘currently deficient in public open space’.

Given these factors it makes no sense to release site C27 for GT accommodation when it is needed here in its existing use. This is a long established open green space and playground which if re-opened and re-purposed would meet the needs of residents and young children in this dense urban area; it would meet the Council’s objectives for open space and play provision and would be a constructive alternative to the allocated use. Its continued use as open green space and children’s play area would be in accordance with NPPF para 99 and 103 – 108; the London Plan Policy S4; Camden Local Plan Policy A2 and submitted Plan policy SC4.

2. Overlooking

The Consultants AECOM (GTSIS) were not required to carry out site inspections when assessing site suitability for GT accommodation since this was not part of their brief. The Council however have disregarded the fact that windows within the 4/5 storey Constable House directly overlook site C27 within about 2/3 meters. The existing holly trees will provide only partial screening, and the privacy of the site occupants will be compromised contrary to the criteria assessing suitability. In addition, because of the proximity of the allocated use to residents of Constable House, the potential for noise and disturbance from the use has not been assessed.

There is also no explanation why overlooking from the existing 6/7 storey residential blocks on Eton College Road has been disregarded in assessing the suitability of the site. Nor has any account been taken of the impact on the privacy of its occupants from overlooking by residents of the new 6/7 storey residential development under construction around Chalk Farm station. Screening of the site by the existing holly trees is mentioned. Because of its topography, access to the site, of no less than 4 meters width, will need to be from Eton College Road. Inevitably a substantial portion of this screening will need to be removed to provide access, and this will have an impact on the privacy of the occupants. It is also likely that development and construction on the site will compromise the existing screening on the remaining two sides.

There are other factors which have not been considered in the Council's assessment of site suitability as follows:

3. The impact on the local character of the area.

This is a dense urban residential area separated by Adelaide Road from the commercial/town centre uses extending along Chalk Farm Road. High density, red brick mansion flats, constructed in the 1930s, line Eton College Road on its east side (The Etons). These 6/7 storey buildings are set in their own landscaped communal/amenity areas and directly overlook the site. The red-brick 4/5 storey Constable House similarly set within its own amenity area, lies to the west. These open green amenity areas with mature trees and hedgerows are important to the character of the local area and contribute to the setting of the Eton Conservation Area located to the north of the site.

The Eton Conservation Area, Sub Area 1, designated in 1973, is characterised by early Victorian stuccoed houses centred around St Saviour's Church, the majority of which are listed Grade II. Mature trees and hedge planting in gardens are important to the character of the local area – *'any erosion of which will be resisted by the Council'*. [Ref. Eton Conservation Area Appraisal and Management Strategy (ECAAMS)]

<https://www.camden.gov.uk/conservation-area-appraisal-and-management-strategies>

The GT site with its static caravans, touring caravans and trailers will be visually intrusive and have a detrimental effect out of character with the area. Heritage England have repeatedly raised the point in their representations on the Draft Plans that *'in the interests of consistency, where allocations are either within or adjacent to conservation areas then reference should be made to the relevant conservation area appraisal or management plan and ensure proposals reflect these in their detail.'* Reference is also made in TP04 Para 6.11 to Historic England's observation that *'a number of the sites are either within or adjacent to conservation areas These issues should be considered when and if sites are taken forward'*.

The character of the local area and the impact of a low-density caravan/traveller's site on this character have not been assessed when considering the suitability of the site for this purpose.

4. Deliverability - Viability

Site C27, with potential for two pitches is not viable for development/use as a GT site. A viability study carried out by BNP Paribas Real Estate, concludes that the provision of GT accommodation will only be viable if it forms part of a larger development. Subsidy will be required for development of smaller pitches. (*REF. TP04 Appendix 6 - BNP Paribas Real Estate 's New Gypsy and Traveller Sites Viability Testing September 2025 Section 5.*)

There are several large potential development sites in Camden [Ref allocated sites in West Kentish and Camden Towns] – much of which remain in Council ownership. Having regard to the conclusions of the above referenced Viability Study, bringing forward GT pitches integrated within these development sites as part of an agreed masterplan to meet GLA's requirements for and the needs of the Traveller community, should be considered.

Recognising the competing demands on land in Camden, the BNP Paribas Real Estate study concludes that the opportunity cost of low density use on land which may be needed for other uses needs to be considered. There is no evidence that an assessment has been made for the allocation of site C27 for GT accommodation. Nor is there evidence that the delivery of such a use in this location is suitable or appropriate.

5. Deliverability – Infrastructure Requirements

The site is also not deliverable in terms of infrastructure requirements. Preliminary consideration has been given to site design options [*REF TP04 Appendix 2*] but there has been no highways/safety assessment re access to the site within meters of 4 other access roads serving adjacent residential blocks. Nor have the implications of the design layout which will require the removal of the boundary screening to the site on Eton College Road been assessed. (Annex [item 3])

Conclusion: The allocation of C27 fails because it is neither suitable nor deliverable for the allocated use. Its availability appears to be predicated on it being Council owned. We would argue there is a greater priority for it to remain in use as green open space and play area for the benefit of the residents of Constable House and the wider area.

59. What consultation took place on the proposed allocation of the site and was it in line with the requirements of the Statement of Community Involvement and the Regulations?

Earlier representations have referred to the lack of consultation and timely disclosure of information on the identification and selection of site C27 for GT accommodation until the publication of Camden's submitted Draft Local Plan in May 2025.

Lack of consultation has been of serious concern in the neighbourhood, leading to requests for clarification and information about the site. During consultation on the submitted draft plan emails were sent from Rebecca Burden, Development Plans Manager, (*REF Responder No. 53*) in response to residents' queries and a FAQ separately circulated. The latter unattributed Camden document is undated, unnumbered and unreferenced, but can possibly be made available through Rebecca Burden.

These documents provide inconsistent and misleading information. Together with subsequent Examination evidence submitted and posted on the Council's website (October 2025) in support of the allocation C27, a confusing and misleading picture emerges regarding site boundaries, site measurements and the planning implications of the allocation as follows:

4 different site boundaries have been used to delineate Allocated Site C27 [Ref Annex] together with different site measurements.

- The submitted Draft Plan Policy Map April 2025 delineates an area of land to the East of Constable House bounded by Constable House on the west, the access road to Constable house on the north, Eton College Road on the east and Adelaide Road to the south. (see also Camden Local Plan Submission Draft Plan Appendix A para 4.10 Fig 8)
- The unattributed FAQ document issued at the time of consultation on the Submitted Draft Plan, refers to a site Plan at the end of the document and delineates the playground area only.
- TP04 - Para 6.21 Table 1 – site C27. The site boundaries delineate an area partially including the playground area with amenity space below fronting Adelaide Road.
- TP04 Appendix 2 delineates a smaller site showing two design options for accommodating 2 G&T pitches on what appears to be the playground area only.
- Schedules accompanying the documents provide measurements for the sites of 460sqm/.046 hectares and 660/1 sqm.

Conclusion: There has been a failure in the consultation process in connection with the allocation of Site 27 for GT accommodation. The allocation of the site was made at a late stage in the emerging Local Plan just before its submission for Examination. The emails and documents issued during the consultation process have served only to reinforce the view that the allocation of site C27 was an 'afterthought' and one that the Council has sought to justify after its selection.

60. What is the status of the existing open space on the site and has the implications of any loss been assessed?

Ref. response to Q58 para 1 above.

The land is part of the Constable House Housing Estate, and its long established and designated use is as an open, green space/amenity area with an enclosed playground/kick about area for use by Constable House residents. The playground is now locked, pot-holed and disused through lack of maintenance rather than lack of demand or need. The Council holds the freehold of the residential block and surrounding amenity and access areas.

It is a highly visible site, and heavily used pedestrian route, close to Chalk Farm Station at the junction of Adelaide Road and Eton College Road. It lies in a densely built-up area, which in other documents, is recognised as deficient in open green space and children's play areas. New development in the area is required, as part of Section 106 Agreements and/or CIL contributions, to provide towards creating or improving open space/children's play areas – also estate regeneration.

There is no evidence that the implications of any loss of this amenity open space and children's playground have been assessed.

61. How will the site be accessed and what are the views of the Highways Authority?

No assessment of infrastructure requirements nor highway comments has been found in the Council's supporting documents. The only reference to Site C27 found in Appendix T - Local Plan Site Allocations – Infrastructure Requirements (ED03t) states that the site is 'council' owned.

<https://www.camden.gov.uk/documents/d/guest/appendix-t-site-allocation-infrastructure-requirements-table>

62. What flood risk is associated with the site and has any impacts been assessed?

35% of the site C27 is at medium to high risk of flooding and is regarded as 'vulnerable' for use as housing. The analysis schedule *EB22 page 29/30 - Managing Flood Risk in Camden – Sequential Test of the site allocations in the Camden Local Plan Proposed Submission Draft April 2025* states in respect of allocated site C27 'Furthermore, it is considered that the flood risk identified can be mitigated through a Flood Risk Assessment'.

There has been no flood risk assessment for the site.

63. Has the environmental impact of the allocation been assessed and if so, what were the findings?

None has been found. Works to HS2 on Adelaide Road railway embankment has partially removed the Adelaide Nature Reserve. Amenity land adjacent to Constable House together with its mature trees, helps maintain a green corridor through the area and its loss for alternative use has not been environmentally nor ecologically assessed.

64. Has the impact on living conditions been assessed in terms of overlooking and privacy for both new and existing inhabitants? Can any impacts be mitigated?

No assessment has been found. As indicated above, in paragraph 2 of the response to Q58 the Council have disregarded:

- a) windows within the 4/5 storey Constable House directly overlooking the site, within 2/3 meters.
- b) overlooking from the existing 6 storey residential blocks on Eton College Road.
- c) overlooking by the new 6/7 storey residential development under construction opposite, next to Chalk Farm Underground station.
- d) overlooking from the surrounding 4 storey dwellings on Adelaide Road and the adjacent 4 storey houses in the Eton Conservation Area which back on to the site.
- e) the site's location close to a busy pedestrian route leading to Chalk Farm Station.

Screening of the site by the existing holly trees is mentioned. However, this will provide only partial screening on two sides since road access will require removal of the boundary screening on Eton College Road. It is also likely that site construction works will damage remaining trees. Inevitably the privacy of the site occupants will be compromised contrary to planning guidance/criteria for assessing suitability.

65. Are any modifications required to site allocations in Central Camden for soundness?

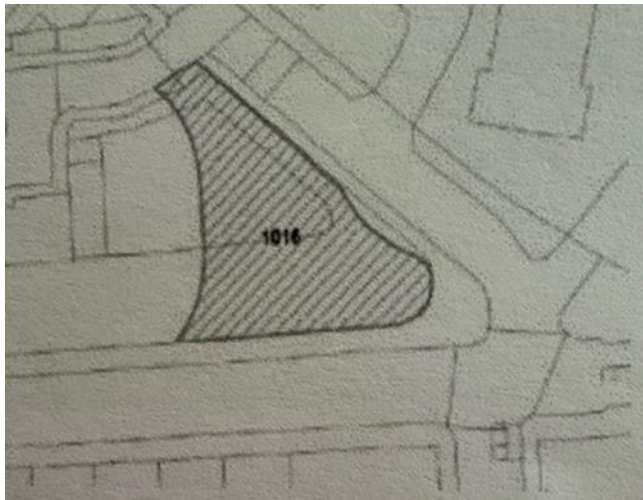
The allocation of Site C27 should be deleted from the Allocation Schedules accompanying the Submitted Draft Plan and from the Plan's Policy Map.

References to land adjacent to Constable House (Site Allocation C27) in the submitted Draft Local Plan 2025 and proposed in Camden's Main Modifications to policy H11 should be deleted and consequential amendments made to Policy 11 Part A and Part C; and in the two new paragraphs proposed after Para 7.364. *[REF SD 51 Schedule of Proposed Main Modifications to the Camden Local Plan Proposed Submission Draft]*

12/03/2026

ANNEX: C27 Site Boundaries

1. <https://www.camden.gov.uk/documents/d/guest/eb12-gypsy-and-traveller-site-identification-study> Appendix F: Short listed Sites. Page 68. And TP04 Table 1



2. Site Boundary included in unattributed FAQ Document Circulated to residents June 2025



3. TP04 Appendix 2

