



Planning Policy

Camden Town Hall

London Borough of Camden

Judd Street

London

WC1H 8EQ

Network Rail

[REDACTED]

London

[REDACTED]

20 June 2025

Network Rail - Public Consultation Response to the London Borough of Camden's draft Local Plan - June 2025

Thank you for consulting Network Rail on the new draft Camden Local Plan. Please consider this letter the formal Network Rail response to the consultation.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains, and develops the main rail network. This includes the railway tracks, stations, car parking, signalling systems, bridges, tunnels, level crossings and viaducts. For background, in March 2024 Network Rail has previously made comments in relation to the public consultation to the previous phase of the draft Camden Local Plan.

Network Rail is delivering a number of infrastructure upgrades within the London Borough of Camden, primarily in the Euston area, and additionally holds an interest in multiple development sites identified by the Camden Site Allocations document.

Infrastructure works at Euston

Network Rail is currently delivering infrastructure upgrades to Euston Station and within the Euston approaches to facilitate the new HS2 railway. The majority of the works are being delivered under a mixture of HS2 Act powers and permitted development, with no further planning applications expected at this time.

In addition to this, Network Rail is developing a plan for the long-term re-development of Euston Conventional Station (RECS). It is expected multiple planning application's will be required to consent the works, with the Camden Local Plan a material consideration in the planning process. Considering this, Network Rail has the following comments to make on the planning policy document in relation to the emerging RECS scheme and NR's interest in the delivery of the wider Euston Campus commercial development.

Chapter 3

Network Rail welcomes the inclusion of policy S2 Euston Area alongside the LPA's work to develop a meaningful EAP and Network Rail shares the council's aspiration for transformational change. Network Rail is committed to continued work with LBC and partners to realise full benefits of development potential.

Chapter 7

P163 policy H1/section 7.7 Maximising Housing Supply, and Chapter 7, generally – notes some quite specific build standard requirements that may have viability impact at Euston generally.

P165 section 7.21-22 - essentially outlines the presumption that sites will be developed for housing unless it can be proven this is unviable. Suggest it is better understood how this might apply to Euston, which remains a commercially-led mixed use (for now). Retaining flexibility on use mix is important to optimise development value to Landowners.

Chapter 10

Policy SC3 sets requirements regarding protection/provision of Open Space. RECS aims to provide a transport hub that integrates both with HS2 and commercial development. However, there are space constraints at Euston which means there is a limited ability to unlock open space without compromising operational area. RECS will work with Camden and Partner's to understand what is feasible by finding the balance between operational requirements and offering open space to meet policy expectations.

Chapter 12

P324 Policy D2 Tall Buildings - Euston falls within the designated 40m threshold area. Although not relevant to RECS, not relevant to RECS but a factor affecting design and viability of the wider commercial dev in which NR holds an interest

Camden Site Allocations - Development Sites

The Camden Site Allocations document assigns a number of sites for re-development in which Network Rail have an interest.

CGY6 – Juniper Crescent

The Juniper Crescent site is currently being utilised for operational railway purposes to support the HS2 development in the area. The re-development of the site for residential and/or commercial purposes is currently being explored and is at an early stage, ongoing engagement is taking place with stakeholders and developers in the area.

At this stage, Network Rail welcomes the flexibility in the wording of the policy document to either allow for a continued operational railway use or for future re-development of the site, until the long-term plans for the site become clearer.

IDS17 – Thameslink Site Pentonville Road

Network Rail are investigating the opportunity to bring forward a comprehensive redevelopment on this brownfield site. Network Rail, working with the Innova Partnership

have submitted a separate letter in response to the Camden Local Plan consultation, considering the site allocations and providing a planning policy assessment specific to the site. Network Rail is supportive of the representations submitted by the Innova Partnership. In addition, Places for London are working in partnership with Network Rail to bring this site forward, and have submitted a jointly drafted response

KT3 – Murphy

As part owner of the site, Network Rail has been working closely with Folgate Estates Limited (who own the majority freehold of the site), and we are supportive of the redevelopment and overall vision for the site. Network Rail reserves its position in regard to any future development on site being subject to operational sensitivities and that we will continue to have unrestricted rights of access across the site in order to gain access to the railway. Network Rail is supportive of the consultation representations submitted by DP9 on behalf of Folgate Estates Limited.

IDS9 – 202 Finchley Road

Network Rail are the 'passive freeholder' for the site with ArcCo. holding a long-term lease. Network Rail have no response to make in relation to this site.

KT5 – Kentish Town Road

Separate representations have been made on behalf of Folgate Estates in regard to Draft Site Allocation C5 (KT5) known as the 'Carwash' at 369 – 377 Kentish Town Road. The neighbouring site is also owned by Folgate Estates which has permission for its redevelopment for a mixed use 14-residential scheme (Ref: 2019/0910/P). Network Rail is supportive of the consultation representations submitted by DP9 on behalf of Folgate Estates Limited.

S5 - 120-136 Camley St

We welcome and support the inclusion of allocation S5: 120-136 Camley Street in the April 2025 draft Local Plan, and agree that development must be taken forward in a coordinated way, working jointly with other landowners. As an adjacent landowner with a significant operational presence, we would expect that any proposed scheme will ensure that the layout and design of any scheme properly respects Agent of Change principles with respect to operational noise and light pollution, minimises conflict with operational vehicles, and properly explores options to safely improve connectivity through the Camley Street bridge underpass, including options to open up the adjacent arch to create safety and public realm improvements by separating road vehicles, pedestrians and cyclists. This is also in line with Policy D2 of the London Plan: Infrastructure requirements for sustainable densities, which states that density should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services.

S6 - 104-114 Camley St

We welcome and support the allocation of 104-114 Camley Street within the April 2025 draft local plan, and agree that development must be taken forward in a coordinated way, working jointly with other landowners. As an adjacent landowner and with a significant operational presence, we would expect that any proposed scheme will have properly explored options to safely improve connectivity through the Camley Street bridge underpass, including opening up the adjacent arch to create safety and public realm improvements by separating road vehicles, pedestrians and cyclists. This is also in line with Policy D2 of the London Plan: Infrastructure requirements for sustainable densities, which states that density should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services.

We would also expect any scheme to have considered opportunities to activate the adjacent Camden MDU land (Cedar Way) for development, and to maximise opportunities to provide housing and/or employment whilst minimising the potential for conflict between future railway and residential uses.

With regard to the Camden MDU Land (Cedar Way), this site currently houses a Network Rail maintenance depot with associated storage and parking for staff, however we believe this site could deliver a sustainable and well connected residential/mixed-use development, using existing access off Cedar Way and/or a new access point on the Western boundary of the site. Network Rail have undertaken pre-feasibility work which we would be happy to provide more detail on, and have already entered preliminary discussions with adjacent landowners.

S20 - York Way Depot and adjacent land at Freight Lane

Network Rail support the principle that any scheme should appropriately consider both the immediate and future impact on the railway and its operations, including respecting Agent of Change principles. We also support the principle that any scheme should incorporate efficient design to enable co-location of housing, employment and railway operational uses, and optimise the provision of additional homes, both on this site and within the wider area.

C2 - Regis Road

LB Camden are proposing their Regis Road scheme south of the tracks at Gospel Oak. Given the significant interface proposed with Network Rail ownerships, there has been limited involvement by LB Camden with Network Rail prior to proposals being shared with Network Rail. Whilst Network Rail would be open to discussions with LB Camden, the proposals appear to have significant constraints which require further discussion. Any discussions on this site, should not prejudice the Gospel Oak J Murphy & Sons Site to the North. The J Murphy & Sons site to the North is significantly more advanced in its interface with Network Rail.

If you have any questions regarding the Network Rail response or wish to discuss any of the above matters further, then please do not hesitate to contact me.

Yours Sincerely,

Michael Gradwell,
Town Planning Manager.

Responder 48

From: [REDACTED]
To: [REDACTED]
Subject: Gypsy/Traveller Site
Date: 20 June 2025 16:19:11

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

I feel that having a permanent gypsy/traveller site on this land right next to Chalk Farm underground station would be inappropriate. This area attracts thousands of tourists every month of the year - sometimes this is accompanied with drink related issues. Adding a permanent gypsy site might enhance these problems. There is a local large secondary school next door which local transport is heavily used by students. Nearby Primrose Hill experience many late night disturbances that due to police cuts and withdrawing police is causing problems. I feel that considering this site would be very inappropriate. Regards P Greene

From: [Redacted]
 To: [Redacted]
 Subject: Camden Local Plan - Central Camden
 Date: 20 June 2025 16:31:49

You don't often get email from [Redacted] [Learn why this is important](#)

[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.

**Camden Local Plan – Proposed Submission Draft 2025
 Representation Form**

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk
 Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –
 Part A – Personal Details (You need only submit **one** copy of Part A)
 Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*	2. Agent's Details (if applicable)
*If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.	
Title	Mr <input type="text"/> <input type="text"/>
First Name	Howard <input type="text"/>
Last Name	Perlin <input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1*	<input type="text"/>
Address Line 2	<input type="text"/>
Post Town*	<input type="text"/>
Post Code*	<input type="text"/>
Telephone Number	<input type="text"/>
E-mail Address	<input type="text"/>

Mr Mrs Miss Ms Dr

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

- | | | | | |
|--|-----|--------------------------|----|---------------------------------|
| (1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| (2) Sound | Yes | <input type="checkbox"/> | No | <input type="text" value="No"/> |
| (3) Complies with the Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

*See guidance note at the end of the form for assistance with completing this section.

If you have entered **No** to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

- | | |
|---|--|
| (1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) | <input type="text"/> |
| (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base) | <input type="text" value="Not appropriate"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) | <input type="text"/> |
| (4) Consistent with national policy | <input type="text"/> |

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

The site is too small and will become rapidly overcrowded. It has been seen in Brent that small sites very quickly become overcrowded and dangerous from a health and safety viewpoint. Camden Council will be unable to stop the spread of vans and caravans along Adelaide Road and surrounding roads because of shortage of space. The site is too close to concentrated urban areas which has historically caused friction leading to crime and violence. The area is already underserved from the point of view of doctors' surgeries, hospitals, schools and sanitation. Environmentally the proposal is unsound from the perspectives of noise and pollution.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above. You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Delete C27

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	20.06.2025
----------------	---	-------	------------

Date: Fri, 20 Jun 2025 15:46:57 +0000
From: Divaker Shah
To: PlanningPolicy
Subject:

**Subject: Camden Local Plan: objections to site C27 - Land East of
Constable House, Adelaide Road (Gypsy & Traveller site)**

PERSONAL DETAILS

Name: [Divaker & Hina Shah]

Address: [
]

Email address: [[\[redacted email\]](#)]

OUTLINE OF OBJECTION/REPRESENTATION

**Modification Proposed - Delete Site Allocation C27: Land adjacent to
Constable House, Adelaide Road for Gypsy and Traveller accommodation**

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

•:

• **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location

• It is also an important **Local Green Space /Open Space with mature trees and wild flowers**: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .

• **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

• **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east

west route and busy bus route with implications for the privacy of the site.

- **Flood Risk** -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.

- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.

- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

--

Kind Regards,

Divaker Shah

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:
Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers**: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground**: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking**: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Judith Toland-Brown

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location. The position of a traveller's site would be completely inappropriate. It would be more suitable in the middle of Primrose Hill. The space is limited. There are no amenities for the people. It will create a dangerous entrance to a busy road.
- It is also an important **Local Green Space /Open Space** with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby. The open spaces for exercise are critical and must be preserved. The loss of this space would be detrimental to the youth of the area. The Council does not spend enough on the young population of the area. The youth centres have a but disappeared, the site was and should be maintained for a play area.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site. The site would not be suitable in terms of light and space per resident. The Council needs to also consider the impact of the extra cars/vans and lorries that come with this sort of population. Where would they park?
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place. As a resident of Eton Place I would be against any form of access from Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools and GP services.
There would also have to be an additional substantial allocation for policing and security.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Frank Garnham

Responder 53

From: [REDACTED]
To: [REDACTED]
Subject: Constable house proposed gypsy site
Date: 20 June 2025 18:59:25
Attachments: [image843439.png](#)
[image564347.png](#)
[image073678.png](#)
[image091059.png](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

[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.

Dear Camden Council planning office

Kind regards
Josephine Craven Director
Naylius McKenzie
Sent from my iPhone
Josephine Craven FNAEA
Director
Naylius McKenzie

Sales, Lettings & Property Management
Interior Design & Home Dressing



Sanchin Ltd t/as Naylius McKenzie. Registered Office: 74 Haverstock Hill, Belsize Park, London NW3 2BE. Registered in England No. 3454276. VAT (UK) Registration No. 718943307. This email is confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions presented are solely those of the author and do not represent those of the company from which the email was sent. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. While every effort has been made to scan this e-mail, we can not accept any responsibility for loss of business or damage caused arising from this e-mail.

Thank you for your email, however you haven't answered my questions have you informed the residents of Constable House that potential their playground could be taken away from the children and residents.

Kind Regards,

Josephine Craven FNAEA
Director
Naylius McKenzie
Sales, Lettings & Property Management
Interior Design & Home Dressing

From: PlanningPolicy <PlanningPolicy@camden.gov.uk>
Sent: 26 June 2025 09:01
To: Josephine Craven
Subject: RE: Propose gypsy site traveller site at Constable house

Hello

Thank you for your email.

The Council are currently in the process of preparing a new Local Plan for Camden. The Local Plan is the Council's main planning document which provides the framework for managing development in the borough—it provides the policies and criteria which help planning officers and councillors decide whether different types of development—new housing, new offices, for example—are acceptable and meet local need.

As part of the Local Plan we are proposing to allocate two sites to help meet the accommodation needs of gypsies and travellers in Camden. It is a national requirement for local plans to demonstrate where gypsies and travellers sites could be accommodated.

Please note, however, that any decision about whether gypsy and traveller accommodation is actually given permission and eventually built is a separate process to this one. If you like, the "allocation" of a site here is only about saying "in principle, this site could accommodate this".

The proposed site allocations are:

- Land adjacent to Constable House, Eton College Road; and
- York Way Depot and adjacent land at Freight Lane.

The site allocation proposed in the draft local plan 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.

Whilst these sites are allocated in the Local Plan, as noted no decision has yet been made by the Council in relation to the delivery of gypsy and traveller accommodation on the proposed sites. The decision on whether the proposed sites will be used for Gypsy and Traveller accommodation falls outside of the scope of the Local Plan and is separate to the planning process.

The consultation we are undertaking on the draft Local Plan is in line with our usual procedures which are set out in the Council's Statement of Community Involvement. This sets out how the planning service will consult with residents and stakeholders on planning documents. This does not include specific engagement related to any allocated sites.

Kind regards

Rebecca
Rebecca Burden

Hi

May I respectfully ask if you have informed the residents of Constable House that in the event that you allow this proposal to go ahead that you are taking away from them their playground. As there are very few playgrounds for the residents in the area to use.

Kind regards

Josephine Craven

Hi

My objections to the site are as follows. I feel that this designated site is a protected playground for the resident's of constable house which is social housing and should not be taken away from these residents. The residents that have bought their flats is this Playground included in their leasehold title plan, also wouldn't it be better to build a property on this site that could house a number of people who require social housing I also understand that this is an area that is subject to floods and I also believe that Camden's policy for housing gypsy/travellers that it should not be in a flood zone area which this is.

If you allow this application to go through, I also understand that you'll be removing trees and wild flowers that you have protected over the years and developed and they are important to the environment so the loss is immeasurable.

I sincerely hope that you will reject this proposal.

Kind regards

Josephine Craven

Hi Camden

Wouldn't it be best for Camden to build a high-rise building on this plot where you could house hundreds of homeless people refugees people that really need housing rather than giving this site to just a few gypsies who already have homes.

Kind regards

Josephine Craven

Hi

Would you not be better building community housing on this plot of land where you could provide housing for so many people as opposed to a handful of gypsies with their caravans?

Kind regards

Josephine Craven

Responder 54

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Proposed travellers site Eton College /Adelaide Rds
Date: 20 June 2025 19:23:16

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

I am writing to express my concerns about this proposal because:

It will increase foot fall in the area when we will already have a large increase due to the 2 blocks of flats being built and we not yet know the effect of this

Large vehicles will be required to move the caravans to and from the site and where they will gain access is not known but it will disturb traffic flow on at least one of the above roads

Where will these vehicles be parked when not needed? Parking is already at a premium in the area and it would be difficult or impossible to accommodate additional vehicles if space is not allowed for these on site

Will the site be purely residential? Surely working from home should not be allowed in this residential area where other buildings are listed and subject to planning restrictions

Families living in the restricted space of a caravan will surely use the outside space as well for living, playing etc. This will increase noise levels perhaps to an unacceptable level

Regards

Diana Davis

[REDACTED]
[REDACTED]
[REDACTED]

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the “Communi-trees” community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- *Moore v SSCLG* [2013] EWCA Civ 1194 – established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden’s 2021 surface water flood data as subject to risk. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) – sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (*Romford*) – Traveller sites refused on similar flood vulnerability grounds.

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) – minimum access width standards; - PPTS Paragraph 13(b) – sites must be accessible and deliverable; - Equality Act 2010 – provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation. This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict – all of which apply equally (or more severely) to Site C27.

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - Justification (why this site over others); - Effectiveness (deliverability); - Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Diana Davis

Responder 55

From: [REDACTED]
To: [REDACTED]
Subject: Formal OBJECTION to Site C27 Proposal – Traveller and Gypsy Site at Constable House
Date: 20 June 2025 22:21:38

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Dear Camden Planning Department,

[REDACTED]

[REDACTED]

[REDACTED]



Zhemin Dai



Responder 56

Date: Sat, 21 Jun 2025 00:28:16 +0100
From: David Quinney
To: [redacted]
Subject: Gypsy and Traveller Site in NW3. Survey.

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

I am writing to say I do not want a potential gypsy site built at land east of constable house, nw3 or any site in nw3.

Why does the council want to bring more traffic to an area where you are trying to reduce traffic. Why does the council want to bring more crime and rubbish to an area you are already struggling to keep safe and clean. Why does the council want to put more strain on local services when it cannot support today's services. Why do you want Belsize Park to be yet another run down area of Camden?

Please not my objection.

David Quinney
Camden resident.

Sent while travelling

Date: Sat, 21 Jun 2025 00:07:27 +0000

From: Shazia Mirza

To: [redacted]

Subject: Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

[You don't often get email from [redacted]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

To Whom it may concern,

MY PERSONAL DETAILS

Name: [SHAZIA MIRZA]

Address: [[redacted address] [redacted postcode]]

Telephone number: [[redacted]]

Email address: [[redacted email]]

OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location

- It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .

- Playground: the area was constructed as a play area for the

residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Shazia Mirza

To: Camden Council Planning Policy Team

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the “Communi-trees” community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- *Moore v SSCLG* [2013] EWCA Civ 1194 – established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden’s 2021 surface water flood data as subject to risk. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) – sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) – Traveller sites refused on similar flood vulnerability grounds.

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) – minimum access width standards; - PPTS Paragraph 13(b) – sites must be accessible and deliverable; - Equality Act 2010 – provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation. This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict – all of which apply equally (or more severely) to Site C27. The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - Justification (why this site over others); - Effectiveness (deliverability); - Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Shazia Mirza

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 21 June 2025 07:29:40

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

I wish to object to the proposals about the about the above for the following reasons.

That area is already crowded taking into account

1. the main road which is heavily used making it unsafe for any children living near the road.
2. the building work being carried out at the corner of Eton College Rd and Adelaide Rd.
3. a busy junction at crossing between Adelaide Rd and Chalk Farm Rd
4. will make it more unsafe to use the Zebra Crossing for those having prams or sight restrictions.

David Reece

[REDACTED]
[REDACTED]

In addition to my own observations there are the extra reasons as listed below :-

Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location

· It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It

would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .

- Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- Flood Risk –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Date: Sat, 21 Jun 2025 07:21:57 +0000
From: John Heather
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr), keir.starmer [redacted]
Subject: Permanent traveller site at Land East of Constable House [redacted postcode]

[You don't often get email from [redacted]
Learn why this is important at
<https://aka.ms/LearnAboutSenderIdentification>]

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.

I am writing to object to the application for a permanent traveller site at Land East of Constable House [redacted postcode].

This site is totally unsuitable for the following reasons:

1. That part of Adelaide Road is a traffic black spot, in part due to its close proximity to the zebra crossing and traffic lights at the end of the road. The ongoing HS2 development also contributes to the acute traffic difficulties. A traveller site will only exacerbate this. It would also cause a problem with pedestrian traffic, this is a heavily populated area.
2. This area is well known as a flood risk and is therefore unsuitable for traveller habitation.
3. Local residents really do appreciate green space particularly as it is limited in such a built up area. It would be undesirable to blight it with a development.
4. The site would be uncomfortably close to Constable House. Some residents would be overlooked, their privacy invaded and there may be "right of light" concerns which could result in legal challenges.

In making this objection I do understand the needs of the Traveller community. My point is that this site is totally unsuitable to address those needs.

Best regards,
John Heather

[redacted] [redacted postcode].

Responder 60

Date: Sat, 21 Jun 2025 07:31:58 +0000

From: Rebecca St Johnston

To: PlanningPolicy

Subject: Objection -- Proposed Site C27, Land adjacent to Constable House,
Adelaide Road, Camden

Rebecca St Johnston

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

20.06.2025

**OBJECTION RE: Camden Local Plan, Proposed Site Allocation C27
Land adjacent to Constable House, Adelaide Road (Traveller accommodation)**

I write to object to and request deletion of plans to allocate Site C27 for Traveller accommodation as currently shown in Chapter 4, Table 5 of the central Camden Plan and as also included in Policy H11 of Chapter 7, Meeting Housing Needs and the Draft Policies Map and Schedule of Proposed Local Plan Site Allocations.

In my firm view the proposed site allocation is inappropriate and fully out of character with the area for the following reasons:

- 1) The site lies in an amenity area enjoyed by many local residents as a precious local green open space with flowers and many trees, including recently planted fruit trees.

It is vital that Camden protects the few open spaces it has still remaining as essential environmental lungs for the Borough and its residents.

- 2) The site was preserved as a playground for residents of Constable House and should be protected as such.
- 3) There is insufficient space in this part of Camden to accommodate new residents and traffic which would undoubtedly be created by travellers and their vehicles accessing the site.
- 4) The area is densely populated already with large historic mansion blocks and new apartments.
- 5) It would be more appropriate to identify, landscape and reutilise one of the many redundant brownfield sites in Camden for the purpose of urban regeneration and housing those who need it while preserving the limited recreation space that we have.

Kind regards,

Rebecca St Johnston

Responder 61

Date: Sat, 21 Jun 2025 08:01:50 +0000
From: Libin Ali
To: planningpolicy@camden.gov.uk
Subject: Proposed development of land east of constable house

My name is Asli Muse Warsame, and I reside with my daughters at [REDACTED]
[REDACTED]

I am writing to express my strong opposition to the proposed development of the land to the east of Constable House. We were recently made aware of this proposal through a poster, and I feel compelled to share our concerns.

Our flat is located on the ground floor, directly adjacent to the field in question. For years, we have struggled with persistent issues related to drug activity and disruptive noise, particularly from groups of school children who congregate just outside our door. These issues have had a significant negative impact on our quality of life and sense of security.

We respectfully urge you to reconsider the proposed use of this space. The current challenges faced by residents in this block should be taken into serious consideration before any final decisions are made.

Thank you for your attention to this matter.

Sincerely,

Asli Muse Warsame
[REDACTED]
[REDACTED]
[REDACTED]

Sent from [Outlook for Android](#)

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 21 June 2025 09:54:58

You don't often get email from [REDACTED]. [Learn why this is important](#)

[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.

PERSONAL DETAILS

Names: Nick Captur, Emilia Captur

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- It is out of character with the area
- It will make the areas unsafe at night
- It will increase noise in the area
- The site is too small
- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60

depending on the exact site. .

- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Yours sincerely
Nick / Emilia Captur

Legal Disclaimer

This communication is from the Deloitte Malta firm which consists of (i) Deloitte, a civil partnership regulated in terms of the laws of Malta, constituted between limited liability companies, operating at Deloitte Place, Triq L-Intornjatur, Central Business District, CBD 3050 Malta and (ii) the affiliated operating entities: Deloitte Advisory and Technology Limited (C23487), Deloitte Audit Limited (C51312), Deloitte Corporate Services Limited (C103276) and Deloitte Tax Services Limited (C51320), all limited

To: Camden Council Planning Policy Team

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the “Communi-trees” community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- *Moore v SSCLG* [2013] EWCA Civ 1194 – established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden’s 2021 surface water flood data as subject to risk. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) – sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) – Traveller sites refused on similar flood vulnerability grounds.

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) – minimum access width standards; - PPTS Paragraph 13(b) – sites must be accessible and deliverable; - Equality Act 2010 – provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict – all of which apply equally (or more severely) to Site C27.

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - Justification (why this site over others); - Effectiveness (deliverability); - Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Yours sincerely

Nick Captur / Emilia Captur

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 21 June 2025 09:58:06

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

PERSONAL DETAILS

Name: Nick Captur on behalf of Maurice Captur Limited

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites

available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Nick Captur

Legal Disclaimer

This communication is from the Deloitte Malta firm which consists of (i) Deloitte, a civil partnership regulated in terms of the laws of Malta, constituted between limited liability companies, operating at Deloitte Place, Triq L-Intornjatur, Central Business District, CBD 3050 Malta and (ii) the affiliated operating entities: Deloitte Advisory and Technology Limited (C23487), Deloitte Audit Limited (C51312), Deloitte Corporate Services Limited (C103276) and Deloitte Tax Services Limited (C51320), all limited liability companies registered in Malta with registered offices at Deloitte Place, Triq L-Intornjatur, Central Business District, CBD 3050 Malta. Deloitte Corporate Services Limited is authorised to act as a Company Service Provider by the Malta Financial Services Authority. Deloitte Audit Limited is authorised to provide audit services in Malta in terms of the Accountancy Profession Act. The Deloitte Malta firm is an affiliate of Deloitte Central Mediterranean S.r.l., a company limited by guarantee registered in Italy with registered number 09599600963 and its registered office at Via Tortona no. 25, 20144, Milan, Italy. For further details, please visit (<https://www2.deloitte.com/mt/about>).

From: [REDACTED]
To: [REDACTED]
Subject: Gypsy and Traveller Site Identification Study Feedback
Date: 21 June 2025 10:05:51

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Dear Planning Policy Team:

I am writing to formally object to the proposal to establish a Traveller/Gypsy encampment on the small patch of green land near Chalk Farm tube station. As a concerned resident and stakeholder in the community, I believe that this proposal presents several serious issues that must be addressed before any decision is made. Below are my key objections:

1. Impact on Local Infrastructure

The area surrounding Chalk Farm tube station is already heavily congested, both in terms of pedestrian traffic and local transport links. The introduction of a Traveller/Gypsy encampment in this location would put additional strain on already limited infrastructure. This would exacerbate issues such as public transport overcrowding, road congestion, and pedestrian safety, all of which are critical to the functioning of the local area.

2. Safety and Security Concerns

The close proximity of this encampment to schools, a major transportation hub and significant residential population density raises significant concerns about safety and security for both the children/students, residents and commuters who use Chalk Farm station daily. There are legitimate worries about the potential for increased anti-social behaviour, littering, and even crime in the area, which could make the space less safe and welcoming for the general public. The location is incredibly close to Camden Market, which has already stressed the area from a safety, security and business point of view.

3. Environmental Impact

This small patch of green land provides essential green space, including tree project and garden project, for the community, contributing to local biodiversity and serving as an area for recreation. Converting it into an encampment would destroy valuable green space and negatively affect the local ecosystem, particularly during the warmer months when the area serves as a sanctuary for wildlife. This land must remain as an accessible green area for local residents, not be compromised for alternative use.

4. Disruption to Local Businesses

The proposed encampment is located in an area with a high concentration of small businesses and retail outlets, many of which rely on regular foot traffic from commuters and residents. The uncertainty and potential disruption caused by the encampment—such as the possibility of increased littering or crime—could harm these businesses, potentially

leading to reduced trade and local economic downturn.

5. Planning Precedents and Legal Considerations

There are strict regulations concerning the development and use of public and private land, and the introduction of such encampments must align with planning law. This proposal could set a concerning precedent, encouraging future encampments on other vulnerable patches of public land in the borough. Furthermore, there may be legal challenges from local residents or businesses who feel that their rights and property are being negatively affected by this proposal.

6. Lack of Suitable Amenities and Support Services

One of the key issues that must be addressed is the lack of necessary support services for the proposed Traveller/Gypsy community. Without proper amenities such as waste disposal, water, and sanitation, there are serious concerns about the living conditions and potential public health risks that could arise. Without these facilities in place, the local council would be failing to provide the adequate care and services that are required for a safe and sustainable environment.

7. Impact on Local Education and Family Services

There is a high concentration of families in the immediate area who rely on local schools, parks, and community services. The establishment of an encampment could disrupt the availability of these services and potentially result in overcrowding or safety issues for children. It is essential that the needs of these vulnerable groups are not overshadowed by the creation of an encampment that might present challenges to maintaining the quality of life in the area.

Conclusion

I respectfully urge the council to reconsider this proposal and explore alternative solutions that take into account the needs and concerns of the wider community. Establishing a Traveller/Gypsy encampment in such a high-density, residential area, so close to critical infrastructure and services, would pose significant challenges that the council has an obligation to address comprehensively.

Thank you for your time and consideration of this matter.

Yours sincerely,
Kristi Flax

[Redacted Signature]

Responder 65

Date: Sat, 21 Jun 2025 09:38:57 +0000
From: Olivier Scalongne
To: planningpolicy@camden.gov.uk
Subject: Fw: The Etons Proposed Gypsy And Traveller Site Opposite The Etons

I am writing you to express my concerns regarding the proposed Traveller site opposite the Etons.

Whilst the Council's efforts to assist that community are recognised, there are various reasons why this particular location is wrong. The space itself is already crowded with various properties overlooking this particular location including Eton Place itself and the new development next to Chalk Farm tube. In fact, it is smaller than the minimum size that Camden themselves recommend.

In addition, it is next to a main road, railway line and an area of high footfall as well as meaning the loss of green space in the immediate area. This is not safe for the Traveller community. Last, there are also concerns over the potential impact on the local community and surrounding areas and the policing thereof.

In hopes that you take notice of our concerns.

Yours faithfully,

Olivier Scalongne

Sent from [Outlook for Android](#)

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Proposed Gypsy and Traveller Site Adjacent to Constable House
Date: 21 June 2025 11:12:29

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Dear Sir/Madam,

I am writing in response to Camden Council's consultation regarding the proposed designation of the space adjacent to Constable House as a Gypsy and Traveller site. As a [REDACTED] I wish to express my objections to this proposal.

While I fully recognise the importance of supporting the Gypsy and Traveller community, I strongly believe that this particular location is not suitable for such use for the following reasons:

- **Insufficient Space:** The proposed area is smaller than Camden's own recommended minimum size for these types of sites and is already surrounded by multiple residential properties, including Eton Place and the new development near Chalk Farm station.
- **Environmental and Infrastructure Concerns:** The location is adjacent to a main road and a railway line, lies within a high footfall area, and its development would result in the loss of green space — something much valued by the local community.
- **Impact on Local Community:** There are serious concerns about the potential impact on the quality of life for nearby residents, including increased pressure on local resources and public safety considerations.

I respectfully urge Camden Council to reconsider this proposal and to explore alternative locations better suited to meet the needs of the Gypsy and Traveller community without creating disproportionate challenges for local residents.

Thank you for your attention to this matter.

Yours faithfully,

Fatih Akcelik, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

To: Camden Council Planning Policy Team

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

We submit this representation on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, Eton College Road, NW3 2BU — located directly opposite the proposed site — to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19). We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the “Communi-trees” community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) – sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- *Moore v SSCLG* [2013] EWCA Civ 1194 – established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden’s 2021 surface water flood data as subject to risk. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) – sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) – Traveller sites refused on similar flood vulnerability grounds

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) – minimum access width standards; - PPTS Paragraph 13(b) – sites must be accessible and deliverable; - Equality Act 2010 – provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites: - Within 18m of 4+ storey buildings (overlooking); - Used as amenity or play space; - At risk of surface flooding; - Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict – all of which apply equally (or more severely) to Site C27.

The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of: - Justification (why this site over others); - Effectiveness (deliverability); - Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process.

We therefore respectfully request that: - Site C27 be removed from the Camden Local Plan submission draft; - The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Best regards,

Fatih & Aysen Akcelik

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Proposed Gypsy and Traveller Site Adjacent to Constable House
Date: 21 June 2025 11:15:54

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Dear Sir/Madam,

I am writing in response to Camden Council's consultation regarding the proposed designation of the space adjacent to Constable House as a Gypsy and Traveller site. As a [REDACTED] I wish to express my objections to this proposal.

While I fully recognise the importance of supporting the Gypsy and Traveller community, I strongly believe that this particular location is not suitable for such use for the following reasons:

- **Insufficient Space:** The proposed area is smaller than Camden's own recommended minimum size for these types of sites and is already surrounded by multiple residential properties, including Eton Place and the new development near Chalk Farm station.
- **Environmental and Infrastructure Concerns:** The location is adjacent to a main road and a railway line, lies within a high footfall area, and its development would result in the loss of green space — something much valued by the local community.
- **Impact on Local Community:** There are serious concerns about the potential impact on the quality of life for nearby residents, including increased pressure on local resources and public safety considerations.

I respectfully urge Camden Council to reconsider this proposal and to explore alternative locations better suited to meet the needs of the Gypsy and Traveller community without creating disproportionate challenges for local residents.

Thank you for your attention to this matter.

Yours faithfully,

Aysen Akcelik, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Responder 68

From: [REDACTED]
To: [REDACTED]
Subject: Objection to travellers site at chalk farm station .
Date: 21 June 2025 11:28:32

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

I object to the traveller site being built next to chalk farm station [REDACTED] and this will add to congestion i thought Camden was anti car yet this will involved a huge amount of vehicle movement

Joanna Martinez

Responder 69

Date: Sat, 21 Jun 2025 10:56:05 +0000
From: Rainaaz Razak
To: planningpolicy@camden.gov.uk
Subject: Camden Planning Proposal: [redacted] [redacted postcode]
Objection to C27 Site

Please find attached the following documents:

- A completed response form; and
- A formal objection to the proposed allocation of Site C27 as a Gypsy & Traveller site.

I would be grateful if you could confirm safe receipt of this email and its attachments at your earliest convenience.

Kind regards,

Natasha Razak

[redacted]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

	1. Personal Details*	2. Agent's Details (if applicable)
Title	<input type="text" value="MS"/>	<input type="text" value="Primrose House [REDACTED] Limited"/>
First Name	<input type="text" value="Natasha"/>	<input type="text" value="Directors: Suzy Littlejohn"/>
Last Name	<input type="text" value="Razak"/>	<input type="text" value="Joyce McMiken"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Address Line 2	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Post Town*	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Post Code*	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>

Part B – Please use a separate page for each representation

Name or Organisation: Primrose House [REDACTED] Limited

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-	Yes	<input type="text"/>	No	<input type="text" value="X"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="X"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="X"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text" value="X"/>
(4) Consistent with national policy	<input type="text" value="X"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Please see attached "Formal Objection to Proposed Allocation of Site C27 for Gypsy and Traveller Accommodation"

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Please see attached "Formal Objection to Proposed Allocation of Site C27 for Gypsy and Traveller Accommodation" which includes modification.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Representatives will attend

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Whilst, I shall not attend personally, representatives of Primrose House NW3 Limited shall attend any hearings to ensure the views of the residents of 19 Adelaide Road NW3 3HH – who have been denied meaningful consultation and transparency throughout the process are heard and considered.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector’s Report is published	X
(c) when the Camden Local Plan is adopted	X

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council’s website.

For further information regarding how we store and process your data, please view the Council’s Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	20.6.25
----------------	---	-------	---------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

• **Positively prepared**

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

• **Justified**

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

• **Effective**

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Formal Objection
to
Proposed Allocation of Site C27
for Gypsy and Traveller accommodation.

Submitted by:

Primrose House NW3 Limited

on behalf of the Leaseholders



Representation in Respect of the Camden Local Plan Submission Draft (2025)

Proposed Modification

Delete Site Allocation **C27: Land adjacent to Constable House, Adelaide Road** for Gypsy and Traveller accommodation.

References

- Chapter 4: Central Camden – Table 5: Further site allocations in Central Camden – C27
- Chapter 7: Meeting Housing Needs – Policy H11: Accommodation for Travellers, no. 2
- Draft Policies Map and Site Allocations Schedule – C27 Land to the East of Constable House
- Gypsy and Traveller Site Identification and Selection Report (November 2024)
- Equality Impact Assessment
- Camden’s Duty to Cooperate Statement 2025

Grounds for Objection

1. Legal Non-Compliance

The allocation of Site C27 is not legally compliant with the Local Plan preparation requirements specifically:

- a) **Lack of Adequate Consultation:** At no stage before the publication of the Submission Draft in **May 2025** was the identification and allocation of C27 made clear to local residents. This deprived residents of Constable House, Primrose House, and neighbouring properties of a meaningful opportunity to be part of the consultation nor offer any comments. Consultation was neither fair nor transparent, as the site was absent from the initial list of 18 assessed in the **Gypsy & Traveller Site Identification Study (November 2024)** and **Topic Paper (April 2025)**.
 - **Timeline and Process Issues:** In particular, the two Gypsy and Traveller sites were only identified in the Submission Draft Local Plan published in May 2025. Policy H11 in the Draft Local Plan 2024 merely expressed an intention to identify such sites but did not specify any locations. The Gypsy & Travellers Site Identification Study (GTSIS), a consultant’s report published in November 2024, was only posted on the Council’s website on 24th December 2024, leaving just over a month for public feedback (due by 29th January 2025). Even then, the GTSIS shortlist of 18 potential sites did not identify the land east of Constable House as a potential site. A further assessment of these shortlisted sites, published in a Topic Paper in April 2025, again failed to specifically identify this land.
 - **Limited Opportunity for Local Input:** Due to this timeline, local residents were only able to raise concerns about the allocation of the land east of Constable House during the late consultation period on the Submission Draft Local Plan in May 2025.
- b) **Failure to Apply Site Selection Criteria Consistently:** Paragraph 2.23 of the GTSIS clearly states that amenity land associated with housing estates is generally considered unavailable and unsuitable for allocation because access to private open space for residents of Council owned property is constrained by the dense urban nature of the area. C27 is precisely such land - a long-established amenity space for Constable House residents. Yet no justification has been given for why this constraint was disregarded.

- c) **Failure to Comply with Equality Act 2010:** While Camden Council has undertaken an Equality Impact Assessment (EIA) for the Draft Local Plan 2025, there doesn't appear to be any publicly available, site-specific EIA that considers how the removal of local open space at Site C27 affects vulnerable residents, including young people, the elderly or disabled living in the adjacent housing. Instead, the EIA focuses narrowly on elder-friendly building design and disabled parking, overlooking the broader impact of removing open space on the wellbeing of nearby elderly and disabled residents, despite acknowledging that open space is vital for health, social connection, and reducing isolation. It also fails to assess the potential impact on the privacy and wellbeing of future Traveller residents, as required by national planning guidance.

2. Unsoundness of the Plan

The allocation of C27 is **not sound**, as it is not positively prepared, not justified, and not consistent with national policy. In particular:

a) Inappropriate Use of the Site

- **Loss of Privacy:** The site is highly visible, located at the busy intersection of Adelaide Road and Eton College Road, along a heavily trafficked east-west bus route. This position compromises the privacy not only for future site occupants, but also for existing residents in Primrose House, Constable House, the Etons and Provost Road as well as the new residential block construction at 5-17 Haverstock Hill (identified as C25 in the schedule of allocated sites) as the proposed site will be overlooked on all sides by buildings which are between four and six floors in height.
- **Loss of communal open space:** At **661 sqm**, the site lies within the curtilage of Constable House and has always formed part of its communal open space which should be protected under Chapter 11 of the draft Local Plan. In such a dense urban setting, loss of green space is significant and irreparable.
- **Loss of play area:** The site has historically served as a play area, marked as a playground on OS maps, and is used by local children for informal recreation - a use that is consistent with Local Plan policies (specifically Chapters 10 and 13) to protect play space and green infrastructure.

b) Increased Traffic

- Although the proposed site is designated as *car-free*, this does not eliminate the need for regular vehicle access - including waste collection, emergency services, deliveries, and maintenance. The site lacks independent access and is located at an already congested and heavily trafficked junction on Adelaide Road, a major east-west bus corridor. The introduction of a new residential use here would place additional strain on local infrastructure, increase disruption to Constable House and neighbouring blocks, and compromise pedestrian safety. It is Camden's obligation to provide Gypsy and Traveller sites in a safe and sustainable manner - this location does not satisfy that requirement.

c) Flood Risk

- The site is within a **Surface Water Flood Risk Area** along Adelaide Road, presenting real concerns around drainage, long-term resilience, and environmental justice for its future occupants.

d) Failure to Apply Selection Constraints Evenly

- Camden's site selection principles excluded amenity spaces yet C27 was selected, even though it clearly functions as an amenity space for surrounding residents and has no independent access. This contradicts the Council's stated selection criteria and appears to have been done **without public disclosure or explanation** at earlier stages of the plan.
- At the same time, **other sites that may have been more suitable** were excluded from the final shortlist without transparency. For example:

Site 2598 – West Kentish Town Estate, NW5 4RG (housing blocks and parking area)

Site 2659 – Land off Freight Lane, N1C 4BE (an operational but large council-owned facility)

Several other sites were also excluded including **Frideswide Place**.

These omissions, and the absence of a clear rationale, reflect an inconsistent and opaque approach to site selection across the borough.

In particular, the decision to exclude Frideswide Place, despite it sharing many characteristics with Site C27 highlights these inconsistencies. Both sites are located in mixed-use urban areas. While Frideswide Place has a somewhat more residential setting, it offers greater flexibility in layout and a clearer separation from neighbouring buildings. By contrast, Site C27 is markedly smaller, tightly enclosed by high-density flats, bordered by major roads, and lacks any meaningful buffer zone. These constraints make C27 significantly less suitable in terms of space, privacy, and the wellbeing of future residents.

It is worth noting that despite Frideswide Place receiving some support from Traveller community representatives, Camden Council ultimately withdrew it from consideration.

Crucially, both sites were subject to consultation processes criticised for their lack of transparency and meaningful engagement leading to strong local opposition. Both were added late in the process, giving the public limited time to respond. These are clear indicators of a rushed and flawed process, which has eroded public trust in the Council's planning decisions.

The continued allocation of Site C27, despite the withdrawal of other, potentially more appropriate sites, raises serious concerns about the fairness, legality, and objectivity of the selection process. It suggests that decisions are not being made on the basis of consistent or equitable criteria.

3. Failure of the Duty to Co-operate

Camden's 2025 Duty to Cooperate Statement notes engagement with six neighbouring boroughs but provides no clear evidence of collaboration specifically on Gypsy and Traveller accommodation. Only Camden identifies a need, based on a 2014 assessment, yet there appears to be no shared strategy to demonstrate meaningful collaboration across the boroughs. The Duty to Cooperate (Section 33A, Planning and Compulsory Purchase Act 2004) requires more than discussion; it needs active, ongoing cooperation. In this case, the lack of coordinated planning raises concerns about whether that duty has been genuinely fulfilled.

Conclusion

For the reasons stated, we request that Site Allocation C27 (Land adjacent to Constable House, Adelaide Road) be **deleted** from the Camden Draft Local Plan. A more transparent, consistent, and community-responsive approach to Traveller accommodation should be pursued.

Responder 70

Date: Sat, 21 Jun 2025 11:04:16 +0000

From: mark mcdonald

To: planningpolicy@camden.gov.uk, [REDACTED]

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Please note the attached objection notice. Please let us know if you require any additional information regarding these planned works and the attached objection notice.

Kind regards

mark

Constable House – representations

Sent by email to planningpolicy@camden.gov.uk

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Mark McDonald & Rebecca Ohayon

Address: [REDACTED]
[REDACTED]
[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- :
- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by

residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Responder 71

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 21 June 2025 12:40:26

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

To whom it may concern,

I am emailing with regards to the local plans regarding site C27 for Gypsy and Traveller accommodation.

PERSONAL DETAILS

Name: Dr Lylah Irshad

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- :
 - **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
 - It is also an important **Local Green Space /Open Space with mature trees and wild flowers**: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60

depending on the exact site. .

- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I look forward to hearing your response.

Kind regards
Lylah

From: [REDACTED]
To: [REDACTED]
Subject: Proposed Traveller Site near Chalk Farm – Request for Consideration
Date: 21 June 2025 13:14:47

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

I understand that a permanent Traveller site is being considered for the corner of Adelaide Road and Eton College Road, near Chalk Farm. I wanted to share some reflections and concerns, informed by both personal experience and publicly available research.

Earlier in my life, my family lived near a Traveller site, and we encountered challenges such as poor environmental upkeep and incidents involving local children. While I fully recognise that such experiences are not representative of all Traveller communities, they have nonetheless shaped my perspective.

Recent research from Channel 4's Dispatches (2020), based on data from 237 Traveller sites, found that while more than half had below-average crime rates, around 27% had crime levels significantly above the national average. This suggests that while elevated crime is not universal, there is a measurable increase in risk in a minority of cases.

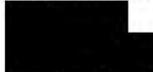
I share this not to stigmatise, but to encourage careful consideration of the location and support structures associated with the proposed site. Ensuring the right infrastructure, community liaison, and safeguards will be essential for building positive relations and preventing avoidable tensions.

I would be grateful if you could take these perspectives into account as plans are developed.

Kind regards, Andrew Day

Date: Sat, 21 Jun 2025 15:02:55 +0100
From: David Wilson
To: [redacted]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Name ;
David and Mary Wilson
Address :
[redacted address] [redacted postcode]



Email address :
[\[redacted email\]](#)

OUTLINE OF OBJECTIONS/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation
Site C27 should be deleted from the following:
Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

1.

Consultation - There has been no prior local consultation for this proposal which will be unknown to that vast majority of residents who do not read draft local plans or know someone who does - it appears likely that the residents of Constable House and the Etons both directly affected are not aware of the proposal, nor how to make their views known. Before the radical decision is made to allocate land in an area where available land is in very short supply to a use which is significantly different to any other in the vicinity, all locals should be properly consulted and their views considered.

2.

Amenity Space - the site is part of a surrounding open space/amenity area for use by Constable House and other local residents. The site is in a densely built up area and would be a serious loss of amenity to all local residents. There is very little open space in this part of Camden and what there is should be retained.

3.

Local Green Space/Open space - the site is an important open space with mature trees and has recently been planted with fruit trees and wild flowers as part of the Communi-Trees project. This valuable local project involves volunteers looking after the newly

planted trees - these would all be destroyed, together with between 30-60 mature Holly trees, depending on the exact site. These would be replaced by a car park with caravans/mobile homes presumably surrounded by high security fencing - not any benefit to the local environment and a particularly unattractive introduction to Chalk Farm and the Camden market area in general for any visitors arriving along Adelaide Road.

4.

Playground - The proposed development is on the site of a play space constructed as such many years ago for the use of local residents, particularly those families living in Constable House, who have no other similar facility and there are no alternate sites nearby. This represents a serious loss of amenity to families in the area.

5.

Overlooking - The site is overlooked on all sides and very unsuitable for this particular use..

6.

Flood Risk - The site is in a flood risk zone - and part has recently been flooded - making it particularly unstable as a site for caravans/mobile homes.

7.

Access - Using the site for caravans/mobile homes for a community which wants to be able to move around will involve creating a means of access for such vehicles to move in and out easily and without causing major problems to other road users - particularly difficult for this proposed site as it is bounded by Adelaide Road, which is a major road and a bus route and Eaton College Road, which is a particularly narrow road wide enough for 2 parked and one moving car only - not a road which could be used to manoeuvre large vehicles.

8.

Alternate uses - Finally, If, despite the objections, Camden Council decided this site should not be allowed to remain as an amenity area/green space and was suitable for development, consideration should be given to whether alternate forms of development would be more suitable for a site in a heavily built up area with high housing density. An area with lower housing density would surely be more suitable for a site for caravans/mobile homes.

We wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

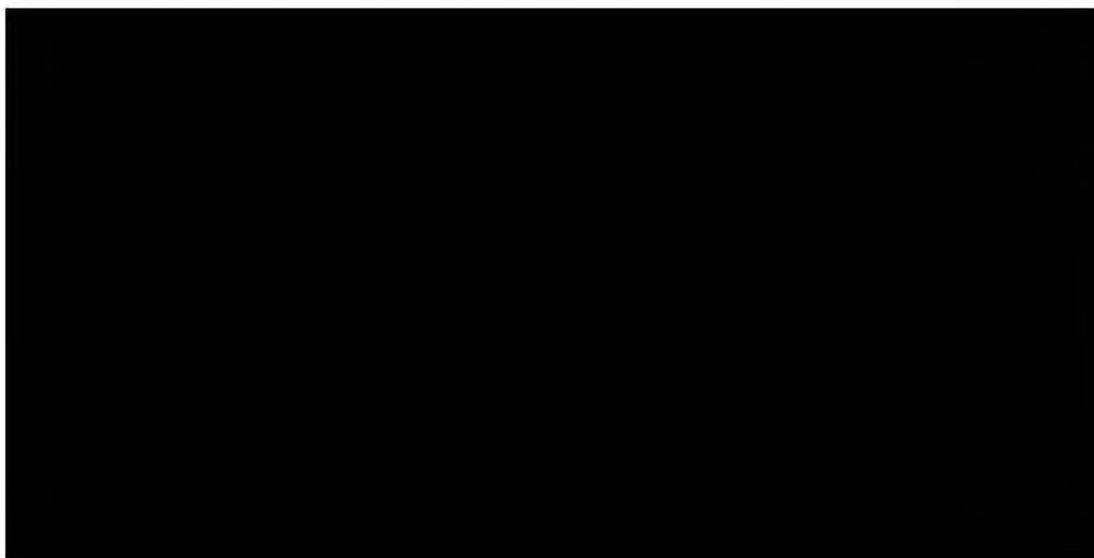
David and Mary Wilson

Responder 74

Date: Sat, 21 Jun 2025 15:35:51 +0100
From: Deborah Saltman
To: [redacted]
Subject: Proposed Gypsy and traveller site

[You don't often get email from [redacted] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.



Sincerely,
Dr. Prof. Deborah Saltman [redacted]



Responder 75

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Camden Local Plan: Objections to Site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)
Date: 21 June 2025 16:41:57

You don't often get email from [REDACTED] [learn why this is important](#)

[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.

Dear Camden Council,

I am writing to formally object to the proposed allocation of Site C27 – Land East of Constable House, Adelaide Road – for use as a Gypsy and Traveller site under the Camden Local Plan.

There are several significant and pressing concerns that make this location wholly unsuitable for residential development:

- 1. Overcrowding and Overlooking:** The site is in an already densely developed area, adjacent to Constable House and Eton Villas. It is overlooked by multiple buildings of over four storeys, including those in Eton Place and the large-scale new development adjacent to Chalk Farm tube station. This significantly reduces privacy and quality of life for any future residents.
- 2. Substandard Size:** The proposed site is extremely small, and notably smaller than the minimum size recommended by Camden Council for such uses. This raises serious questions about the feasibility and adequacy of the proposed development for long-term residential use.
- 3. Poor Environmental Quality:** The location is bounded by a main road, a railway line, and an ambulance route, all of which contribute to constant noise and air pollution. These environmental factors create an unpleasant and potentially unhealthy living environment.
- 4. Impact of HS2 Works:** The site will be heavily affected by ongoing HS2 construction activity for at least the next decade. This includes disruption from works, increased traffic, and further pressure on local infrastructure, all of which make the area even less suitable for residential occupation during this period.
- 5. Visibility and Lack of Privacy:** The site sits along a high-footfall route used by pedestrians walking from Chalk Farm station to Primrose Hill. Any development here would be highly visible and exposed, offering little privacy or seclusion for its occupants.
- 6. Loss of Community Green Space:** The proposed development would result in

the loss of valued green space and a playground currently used by residents of Constable House. Many of these residents appear to be unaware of the proposal, raising concerns about insufficient consultation and community engagement.

7. **Broader Community Impact:** The development would have wider implications for the local community, including increased pressure on public services, traffic, and policing in the surrounding areas, including the sensitive Primrose Hill environment.

In light of these substantial issues, I strongly urge Camden Council to reconsider the allocation of this site for residential purposes, and particularly for a Gypsy and Traveller site, given its unsuitability in both scale and location.

Thank you for considering this objection.

Yours faithfully,

Sarah Auerbach

[Redacted signature]

SARAH AUERBACH

[Redacted address]



From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 21 June 2025 18:54:02

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

PERSONAL DETAILS

Name: Eleanor Rhodes-Davies

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
 - It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6

storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Responder 77

Date: Sat, 21 Jun 2025 19:45:20 +0000
From: Joanna Frank
To: PlanningPolicy
Subject: Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

I am a resident of [REDACTED] and have only very recently learnt about your proposed site development for the land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

I am writing to you to **OBJECT** to the proposal.

Site C27 should be deleted from the following:
Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

My reasons are as follows:

- 1) There is very little open space and areas for residents of Constable House and other local residents to use, and the proposed site would be a serious loss to the amenity of residents particularly in such a dense urban location. I have been a resident of this borough for nearly 30 years, and the recent building works in the area have increased the local population considerably in what was already a densely populated area.
- 2) The area is an important local green space with mature trees and wild flowers. I understand that local young people are responsible for looking after trees and have helped to plant them, along with yourselves Camden Council and other organisations. A large number of trees and holly trees would need to be removed. In an urban setting with high crime levels, giving responsibility to younger people and having them engage in projects to improve their local area is very important. Also having green areas in a city is very important for mental health, and there is a need for such areas particularly in a borough such as Camden with a high prevalence of mental health issues.
- 3) The area was constructed as a play area for the residents of Constable House, and is well used as such. If it is lost, there would be no substitute; obesity and mental health issues are on the rise, surely Camden Council wants to be seen to support initiatives to stay healthy and encourage play rather than remove opportunities?
- 4) The site is overlooked from all directions. And similarly they would be overlooking their neighbours in all directions. It is hard enough in an urban environment to find private quiet space.

- 5) I understand that the site is a flood risk and lies within a flood zone. If approved, it would be contrary to para 13 Government Traveller Sites Planning Policy.
- 6) There would be no independent access to the site and serious disruption is likely to be caused to the residents of Constable House, and Eton Place (which has about 100 flats)
- 7) I am concerned if there has been consideration to local infrastructure such as school places, and GP surgeries. There has been so much development in the Chalk Farm area recently that the local facilities surely are extremely stretched.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons (myself included) and Constable House, are still unaware of the proposals.

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I am informing you that I wish to participate at the examination hearings into the Draft Local Plan before the Inspector, and I can be contacted as below:

Joanna Frank

[redacted] [redacted postcode]

[redacted email]

With concerns,

Joanna Frank

[redacted]

Responder 78

Date: Sun, 22 Jun 2025 08:12:38 +0100
From: [redacted]
To: [redacted]
Subject: Camden Local Plan: objections to site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

[You don't often get email from [redacted]
Learn why this is important at
<https://aka.ms/LearnAboutSenderIdentification>]

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.

Name: Keith Wozencroft

Address: [redacted]
[redacted]
[redacted]

Email address: [redacted email]

I'm very concerned about plans for the land adjacent to Constable House, Adelaide Road for Gypsy and Traveller Accommodation. I've outlined below a few of the main reasons for my concerns.

I'd like to ask that the proposal be Modified - Deleting Site Allocation
C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:
Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

I've outlined below reasons:

. Amenity space associated with housing estates. This is in a dense urban population and the site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area.

. It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of

the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site.

. Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

. Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

. Flood Risk -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.

. There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.

. There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden

land;
Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

For the reasons listed above, I ask that the Camden Draft Plan be modified to by the deletion of site C27.

May thanks for your consideration,
All the best,

Keith Wozencroft
22nd June 2025

Responder 79

Date: Sun, 22 Jun 2025 11:09:18 +0000

From:

To: PlanningPolicy

Subject: Formal Objection to Proposed Allocation of Site C27 for Gipsy and Traveller Accommodation

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Ross"/>	<input type="text"/>
Last Name	<input type="text" value="Anderson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████████"/>	<input type="text"/>
Post Town*	<input type="text" value="████"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████████████"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="X"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text" value="X"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Dear Camden Council,

I am writing to submit my objection to the proposed development of a Traveller site adjacent to Adelaide Road (site C27 on the Policy Map).

It is important to understand the context of the C27 site. I encourage all decision makers to visit the site as it is quite evidently unsuitable. It is sandwiched between Constable house and the busy Adelaide Road.

I believe this proposal is not legally compliant, fails to meet the standards required for sound plan-making, and does not demonstrate that the Council has fulfilled its duty to cooperate.

Legally Compliant

Appropriate consultation: It is not clear to me that the Council has consulted appropriately on this proposal, given that I understand residents in the adjacent Constable House are largely unaware of it. The proposal risks undermining social cohesion by placing residents in such a location, and by eroding local greenspace and amenities, without appropriate local engagement.

Unsoundness

1. **Justified:** Camden Council has not demonstrated that this is the most appropriate site when judged against reasonable alternatives. This is because of the following issues:
 - a. **Wellbeing of travellers:** The site is sandwiched between Constable House and Adelaide Road, a busy bus route and artery into Chalk Farm Road. A site so close to the road would endanger the welfare of those living there through high levels of noise and air pollution.
 - b. **Loss of privacy of travellers:** The site is situated in a densely populated area, with taller buildings surrounding it on all sides. The residents on the site would lack privacy and it would impact the privacy of existing residents.
 - c. **Loss of amenity and greenspace:** The site would also further reduce much valued green space in the area, when such spaces are already under threat from developments with HS2. The area itself is a children's play area. The land adjacent to the site is used by sunbathers, pic-nickers, dog-walkers, and a local environmental group who have planted wildflowers and trees. The proposal would remove or undermine these amenities which are relied on by local families.
 - d. **Environmental concerns:** The site is on a slope and would appear likely to suffer from flooding, a fact reinforced by the Gypsy and Travellers Site Identification Study of the site.
 - e. **Traffic and safety issues:** The presence of such a site would inevitably have a negative impact on existing levels of traffic, and related air and noise pollution which the area already struggles with.

- f. **Overcrowding:** As raised in the Gypsy and Travellers Site Identification Study, such small sites tend to become overcrowded, which is an issue in an area which is already densely populated, and which suffers from significant problems of antisocial behaviour.
- g. **Inexplicable choice of site when compared to others:** When reading through the study and the related literature, it is not clear how this site was chosen vis-à-vis alternatives. Other sites appear to have been excluded but it is not clear why. This brings into question the entire exercise and suggests that the criteria used to select this site, as opposed to others, has not been applied in a manner which is consistent or understandable to the parties concerned.

2. Consistent with National Policy: The National Planning Policy for Traveller Sites calls for fair and effective provision while ensuring planning decisions promote safe and healthy environments. Locating a residential site in an area affected by heavy traffic, noise, and limited green space appears to be inconsistent with these aims.

Duty to Cooperate

It is not clear that Camden Council has engaged in any effective cooperation with other boroughs in the consideration of the site. This again brings into question the legality of the process.

For these reasons, I respectfully request that Camden Council reconsider the selection of this site and instead consider alternatives that better align with national policy, demonstrate sound planning, and better safeguard the welfare and wellbeing of Traveller communities.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Site C27 should be deleted from the Draft Local Plan 2025.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

Yes

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

I wish to ensure my views are adequately represented during the proceedings.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:	Ross Anderson	Date:	22 June 2025
-----------------------	----------------------	--------------	---------------------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

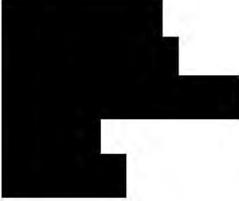
Responder 80 and 687

Date: Sun, 22 Jun 2025 11:20:01 +0000

From: Ian Williams

To: PlanningPolicy

Subject: Camden Local Plan: Formal Objection to site C27 – Land East of
Constable House, Adelaide Road (Gypsy & Traveller site)



Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ.

20th June 2025

Ref: Camden Local Plan: Formal Objection to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Dear Planning Policy Team,

I am writing to formally object to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025).

I would be grateful if this representation could be considered as part of the Regulation 19 consultation and respectfully request that the Planning Inspector recommend the site's removal from the Local Plan on the grounds of unsoundness, as it fails the tests of justification, effectiveness, and consistency with national policy as set out in NPPF paragraph 35.

I have included further rationale in the attached sheets detailing why this site should be removed from the Local Plan and would be grateful if you could acknowledge receipt of my objection and confirm its inclusion in your considerations. I would also be happy to participate at the examination hearings into the Draft Local Plan before the Inspector should this prove necessary.

Yours faithfully,



Ian Williams BSc, MIET



OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

1. **Access and Road safety** – Site C27 is located at a busy road junction for vehicular and pedestrian traffic. The proximity of Chalk Farm tube station and foot access to Primrose Hill results in a high volume of people crossing Adelaide Road with constant interruption to the busy flow of traffic towards Camden Town. With the current construction of additional housing blocks next to Chalk Farm Tube any further addition from site C27 would substantially increase the risk to pedestrians and residents.

There is **no independent access** to site C27 and serious additional disruption is likely to be caused to residents of Constable House. There is currently only space in Eton College Road for one way passage of traffic. Additional traffic requiring access to site C27 would result in frequent blocking of Eton College Road and severely restrict access to Eton Place immediately opposite. It would also restrict the frequent delivery vehicles and emergency response services that regularly use the road.

2. **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
3. It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with several fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
4. **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

5. **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
6. **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
7. There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools** or capacity at local **doctor, dental surgeries and other community support services**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*).

The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to :

- (i) Provide new and/or improved sport and leisure facilities for young people
- (ii) Deliver new and enhanced areas of open space and play space, and improved access to nature
- (iii) Enhance greening and biodiversity
- (iv) Deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. Some notices have appeared on lampposts in the area in the last week however, it seems that most residents, including those of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27. I ask that a more appropriate, sustainable, and inclusive solution be found in consultation with all affected communities.

Responder 81

Date: Sun, 22 Jun 2025 15:39:32 +0200

From: vivien lewis

To: [redacted]

Subject: Traveller site

[You don't often get email from [redacted] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

[redacted]

Vivien Lewis

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Proposed Traveller Site at Land East of Constable House (Site 1016)
Date: 22 June 2025 14:53:49

You don't often get email from [REDACTED]. [Learn why this is important](#)

[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.

To whom it may concern,

I am writing as a local Camden resident to formally object to the proposed Traveller site at the land east of Constable House, NW3 3QA (Site 1016), identified in Camden Council's Gypsy and Traveller Site Identification Study.

While I fully support Camden's duty to meet the accommodation needs of all communities, I strongly believe this particular site is unsuitable for the following reasons:

1. Access and Traffic Constraints

The proposed location is bordered by narrow residential streets (Adelaide Road and Eton College Road), which already experience high congestion and limited maneuverability. These roads are not designed to accommodate large vehicles such as caravans or mobile homes. The introduction of such traffic will pose serious safety risks for pedestrians and cyclists, many of whom are schoolchildren, and will exacerbate existing congestion in an already strained area.

2. Loss of Valuable Green Space

The site currently serves as one of the last remaining green buffers in a highly urbanised part of Camden. This space provides an important environmental and recreational function for nearby residents, particularly families with children. In a borough with limited public outdoor space, repurposing this land would be a significant and irreversible loss.

3. Overdevelopment and Pressure on Local Services

Chalk Farm and the surrounding area are already under intense development pressure. Additional residential units of any kind will place further strain on public services such as schools, GP surgeries, and waste collection — none of which have been demonstrated to be capable of absorbing this growth.

4. Privacy and Amenity Concerns

The site directly adjoins residential buildings. Even with existing vegetation, the proximity raises serious concerns about overlooking, loss of privacy, and potential disruption for both existing residents and prospective site users. These issues cannot be meaningfully resolved given the layout and density of the surrounding area.

5. Premature Inclusion Without Community Consultation

According to the Council's own study, this shortlist was compiled without any

community engagement or site visits. Proceeding with proposals in such a sensitive area without first consulting affected residents undermines transparency and trust in the planning process.

For all the reasons above, I urge the Council to reconsider the inclusion of Site 1016 in the shortlist and to seek alternative locations that do not compromise safety, amenity, or community cohesion.

Please confirm receipt of this objection and keep me informed of the next steps in the consultation process.

Yours faithfully,

Anna Lolua

Responder 83

Date: Sun, 22 Jun 2025 15:21:37 +0100
From: Samantha Ellis
To: [redacted]
Subject: Recycling centre moving to Kentish Town police centre site

[You don't often get email from [redacted] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

Hi there

I'm writing to register my concern about and objection to the plan to move the Regis Road recycling centre to the site of the police station in Kentish Town. I live on [redacted] and that small network of streets is the only relatively calm & traffic free part of Kentish Town. This would create traffic, noise & fumes etc & possibly attract vermin. Since I moved in 6 months ago there have been loads of changes made to these streets to make them healthier for schoolchildren & to then put a recycling centre in the middle seems totally contrary to that. I have an 8 year old child & moved to the area assuming it was a calm & quiet area. I really object to the recycling centre being moved to the end of my road.

Thank you.

Samantha Ellis
[redacted address]

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 22 June 2025 18:35:46

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

PERSONAL DETAILS

Name: Athanasios Analogidis

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- **Flood Risk –The site lies within a flood risk zone (and has been subject to recent significant flooding** across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Sincerely,

Athanasios Analogidis



From: 
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 22 June 2025 19:39:04

You don't often get email from  [Learn why this is important](#)

[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.

PUBLIC

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Dear Camden Council Planning Team

I am writing to object to the current plans referred to above to allocate land adjacent to Constable House, Adelaide Road, as a gypsy and traveller site. I believe the plans as outlined will have a significant detrimental effect as set out below.

1. This is an important **Local Green Space /Open Space with mature trees and wild flowers**. The green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. This scheme involves local young people, giving them an important sense of community and responsibility. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting, making the area significantly less pleasant and disenfranchising those young people engaged in the scheme. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
2. **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby. This would be a significant loss to the population of the estate, particularly the children growing up in an estate with very little space.
3. **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents in what is already a very densely populated area and set to become more so with the construction of new housing next to Chalk Farm Tube Station. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area.

4. **Overlooking:** The site is overlooked on all sides. To the east by residents of Constable House, to the north by residents of Provost Road, to the west by residents of the 6 storey Etons and the new residential block under construction next to Chalk Farm tube station, and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site. It is also right next to the development site for HS2, with associated noise, traffic and air pollution. As such, this will not be a pleasant living space for the traveller community.
5. **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
6. **Independent access:** there is no independent to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place and next to the already very busy junction.
7. **Local facilities:** There appears to be no evidence that consideration has been given to whether there are places available at nearby schools. Local facilities including public transport and doctors surgeries are already under significant pressure from the high demand from a large local population. This will make the situation worse.
8. **Consultation:** There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

As set out above, the Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Best wishes
Lucy Rahal

This email and any attachments are confidential and may also be privileged. If you are not the intended recipient, please delete all copies and notify the sender immediately. You may wish to refer to the incorporation details of Standard Chartered PLC, Standard Chartered Bank and their subsidiaries together with Standard Chartered Bank's Privacy Policy via our main Standard Chartered PLC (UK) website at sc.com

Responder 86

Date: Sun, 22 Jun 2025 19:59:46 +0100

From: Imogen Eyre-Maunsell

To: [redacted]

Subject: Please see enclosed

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Imogen and Thomas Eyre-Maunsell

[REDACTED]

[REDACTED]

[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

While we support Camden's initiative to create space for this disadvantaged community, we believe the selection of this site is unsuitable for several important reasons:

1. **Overcrowded Area:** The site is located in an already congested area, adjacent to Constable House and Eton Villas, and would be overlooked by taller buildings, including those on Eton Place and the new development next to Chalk Farm tube station.
2. **Size Concerns:** The site is very small, in fact, smaller than the minimum size that Camden themselves recommend for such developments.
3. **HS2 Impact:** The site will be significantly affected by the HS2 works for the next decade, leading to additional traffic and disruption in the area.
4. **Lack of Privacy:** With high foot traffic from Chalk Farm station to Primrose Hill, the site will be highly visible and lack the necessary privacy for residents.
5. **Loss of Green Space:** Developing the site would result in the loss of green space and a playground currently used by the residents of Constable House, who seem to be unaware of the proposed plan. **Local Green Space:** The site is an important Local Green Space, home to mature trees and wildflowers. Recent efforts have seen the planting of fruit trees and wildflowers as part of the Communi-Trees project, which also provides opportunities for local youth. Redeveloping this site would require the removal of these trees and the project itself. **Playground:** The site serves as a playground for Constable House residents, a facility that has been in place for many years and is shown on historical OS maps. If the site were developed, this essential amenity would be lost, with no nearby alternatives available.
6. **Community Impact:** The proposal will have wider consequences for the local community, including potential impacts on policing in the area.

7. **Concerns from the Traveller Community:** The Traveller community has expressed concerns about the plans, fearing the loss of their current accommodations as a result (see [Camden Citizen article](#)).
8. **Flood Risk:** The site is located within a flood risk zone and has experienced significant flooding recently, which contradicts government guidelines on Traveller Sites Planning Policy (para 13).
9. **Access Issues:** The site lacks independent access, and any construction would likely cause serious disruption to Constable House residents. The proposed access would also be located directly opposite the entrance to Eton Place, further complicating access.
10. **School Availability:** There appears to be no evidence that consideration has been given to whether nearby schools have the capacity to accommodate the children of future residents.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Responder 87

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 22 June 2025 20:01:28

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

For the attention of: planningpolicy@camden.gov.uk

I am Darren Milne of [REDACTED]
[REDACTED] and I want to make an objection to site C27.

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Please can you note my object due to

- The area is an open space/amenity area for use by Constable House and other local residents
- It is also an important green space has in the last few months been planted with a number of fruit trees and an area of wild flowers
- the area was constructed as a play area for the residents of Constable House, and is used as a play space.
- The area is overlooked on all sides
- The site lies within a flood risk zone
- There is no independent access and is opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools

- There has also been no consultation with local residents in relation to the proposed use of this site

Therefore the Camden Draft Plan should be modified to by the deletion of site C27.

Kind regards

Darren Milne

Date: Sun, 22 Jun 2025 20:59:30 +0100

From: Roberta Herriman

To: [redacted]

Subject: Formal Objection to Proposed Development of Gypsy and Traveller Site – Land East of Constable House, [redacted postcode] (ID 1016)

We are the owner of [redacted] [redacted address], [redacted]. We are writing to formally object to the proposed development of land for use as a Gypsy and Traveller site on Land east of Constable House, [redacted postcode] listed under [redacted].

This site lies within a [redacted] of my home, and we have serious concerns about the suitability of this location for such a development based on both practical and community related grounds. We respectfully ask that these objections be taken into full consideration:

1. Incompatibility with Surrounding Residential Environment

The proposed site is situated immediately adjacent to established residential buildings, including Constable House and other homes in the Belsize Park and Chalk Farm area. The development risks causing significant disruption to this settled, quiet neighbourhood, both in terms of visual impact and residential amenity.

The area is already densely populated, and introducing a high intensity land use like a Traveller site will likely strain local services, including healthcare, schools, and waste collection, which are already under pressure.

2. Public Safety and Crime Concerns

Evidence from other areas has shown that the introduction of similar sites can lead to spikes in crime and antisocial behaviour especially when they are placed in inappropriate, poorly supported locations. While this is not a comment on any group as a whole, it is essential to consider the broader social impact that such developments have had in other boroughs.

A site so close to residential homes and public parks could potentially lead to increased anxiety within the local community, particularly among elderly residents and families with young children.

3. Environmental and Flood Risk

The council's own documentation identifies the potential for flooding in this area, with Adelaide Road previously noted in the 2021 Flood Streets data. Placing a residential site especially one relying on caravan type accommodation on land at risk of flooding raises serious questions about both resident safety and long term viability.

Moreover, the development would lead to the loss of valuable green space. Urban greenery is vital for environmental quality, biodiversity, and public well being. The site currently provides a visual buffer and serves as an important ecological feature in an already built up area.

4. Privacy and Overlooking

The proposal includes land within direct sightlines of existing residential blocks across Eton College Road. The partial screening by vegetation is wholly insufficient to mitigate the loss of privacy that residents would face. The constant movement associated with a Traveller site would only exacerbate this intrusion.

5. Lack of Community Consultation

To date, there appears to have been minimal consultation with the residents who will be most directly affected by this development. A proposal of this nature and sensitivity demands transparent dialogue, thorough impact assessments, and evidence that alternative, more

appropriate locations have been properly considered.

6. Impact on Property Values

It is a well-documented concern that such developments may adversely affect nearby property values. While this should not be the primary deciding factor, it remains a valid concern for homeowners who have invested in the area and now face uncertainty over the character of their neighbourhood.

In conclusion, while we understand the need for inclusive accommodation provision, we strongly believe this location is unsuitable for such a development based on its environmental, social, and infrastructural limitations. We urge the Council to reject this proposal and to explore more appropriate sites that better meet the needs of the Travelling community without imposing disproportionate burdens on an established residential neighbourhood.

Thank you for your consideration.

Yours faithfully

Roberta and Alfred

Responder 89

Date: Sun, 22 Jun 2025 21:11:13 +0100

From: Patrick Roberts

To: [redacted]

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Yours faithfully

Patrick Roberts

A black rectangular redaction box covering the signature of Patrick Roberts.

Patrick Roberts

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 June 2025

Planning Policy Team
London Borough of Camden Council
5 Pancras Square
London N1C 4AG

Delivered by email

Dear Sirs

Subject: Camden Local Plan: Objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Modification Proposed

Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

Site C27 should be deleted from the following:

- Chapter 4 Central Camden: Table 5
- Chapter 7: Meeting Housing Needs: Policy H11
- Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

My principal reasons for making this modification to the Camden Local Plan are as follows:

- **Amenity space associated with housing estates:** the proposed use of this site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location. It forms part of the surrounding open space/amenity area for use by Constable House and other local residents.
- **An important Local Green Space /Open Space:** it has mature trees and wild flowers and the green space has in the last few months been planted with a number of fruit trees and an area of wildflowers as part of the Community-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Community-Tree plantings. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.

- **Playground:** the area, which was constructed as a play area for the residents of Constable House, is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and other local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** the site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House, Adelaide Road. This road, which adjoins the site to the south, is a key east west and busy bus route with implications for the privacy of the site.
- **Flood Risk:** the site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- **Independent access:** there is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- **Education amenities:** there appears to be no evidence that consideration has been given to the meeting of potential additional demand for places at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including those of Constable House and The Etons, are still unaware of the proposals.

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Yours faithfully

Patrick Roberts

Date: Mon, 23 Jun 2025 07:30:34 +0000
From: Polly King
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

My name is Polly King, and together with my husband own a property in [REDACTED]
[REDACTED] I would like to submit an objection/representation to the proposal to use the land adjacent to Constable House, Adelaide Road, for Gypsy and Traveller accommodation.

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location
- It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees.
- Playground: the area was constructed as a play area for the residents of Constable House and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the six storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- Flood Risk -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13

Government Traveller Sites Planning Policy.

- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.
- Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.
- For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

My contact telephone number is [REDACTED]

Regards,

Polly King

Responder 91

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 23 June 2025 09:22:59

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Good morning,

I hope this email finds you well.

Please see below an outline of our objection to site C27 on the behalf of our client.

Name: Election Ltd., C/O Buckingham Properties

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

We believe that Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

We believe this because of the following:

- The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
- The area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative

sites available nearby.

- ▶ The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- ▶ The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- ▶ There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- ▶ There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site. The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Kind regards,

GEMMA BROWN
BUCKINGHAM PROPERTIES

[Redacted signature block]

[Redacted contact information]

Website: www.buckprops.com

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Dr Stefan Micallef

[REDACTED]

[REDACTED]

[REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location. The small size of the plot identified, begs the question whether Camden Council has determined what is the minimum size for such a development and if it has, does this plot meet this requirement?
- **Local Green Space /Open Space with mature trees and wild flowers:** the green space is an important green space and has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site.
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute and would be detrimental to the young using the area. There are no alternative sites available nearby.
- **Congested Urban dwellings:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and

busy bus route with implications for the privacy of the site. This has ramifications, such as: 1) the lack of privacy as the site is directly overlooked by several buildings; 2) its location immediately adjacent to the tube station on an already busy pedestrian route and constant footfall towards Primrose Hill, Adelaide Road Camden Market etc.

- **Flood Risk –*The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.***
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The assessment has relied in the main on GIS methodology which in essence boils down to a desk top assessment. The constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Dr STEFAN MICALLEF, BSc. MSc, PhD

23 June 2025

Part B – Please use a separate page for each representation

Name or Organisation: **Belsize Conservation Areas Advisory Committee.**

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="yes"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Policy DS1: The prioritisation of re-use over redevelopment should be included. Applications for demolition and newbuild should demonstrate that re-use has been properly assessed as an alternative.

Fig 11: It would be helpful to show public and private open spaces separately.

Site allocations C14, C22 Other considerations: Add “consideration should be taken of height in relation to views from adjacent conservation areas, eg Parkhill and Upper Park”.

Para 8.67: We can’t see any reference to an Article 4 Direction for Parkhill and Upper Park or Elsworth Conservation Areas on Camden’s website.

Para 8.71: Insert “or in a conservation area” after “listed buildings”.

Para 12.12: Clarify what is meant by “architect retention clauses in legal agreements”. Add new bullet point “Applying rigorous enforcement of planning consents, especially in conservation areas.

Policy D2: Wendling and St Stephens. See comment on Allocations C14, 22 above.

Policy D2 Fig 22: Sites g,f,k,l and n would appear to be highly visible from Parkhill and Upper Park Conservation area. Building heights should respect this.

Para 12.69: Add” Dormer windows and roof lights in front roof slopes and excessively large dormers to side slopes will be resisted.

Policy D6 C4: Add ”except in relation to party wall boundaries, in which case requirement E affords protection to adjoining properties”.

Para 12.157: Add “estate agents boards should continue to be banned in conservation areas”.

Policy A1 B4: Add “including light nuisance to neighbours”.

Site allocation W2: include supermarket, book shop and doctors surgery.

Add Retrofitting Planning Guidance.

Add local listings and designated heritage assets.

Add energy efficiency planning guidance for conservation areas.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

|||

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	yes
(b) when the Inspector's Report is published	yes
(c) when the Camden Local Plan is adopted	yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:	David Thomas	Date:	20 June 2025
-----------------------	---------------------	--------------	---------------------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Date: Mon, 23 Jun 2025 09:39:09 +0000
From: Janet Cowen
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: objections to site C27 - Land east of Constable House, Adeleaide Road (Gypsy and Traveller site)

Dear Planning Policy Team,

I am writing as a local resident to formally object to the allocation of Site C27 - Land East of Constable House, Adelaide Road - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft.

While I support Camden's efforts to find accommodation for the Gypsy and Traveller community, I consider this site unsuitable for several reasons:

- It is in an already crowded area with a busy passing footfall and traffic congestion.
- There is no independent vehicular access to the site.
- It is overlooked on all sides. The proposed use would have adverse implications for the privacy of both existing residents and potential occupiers.
- The proposed use would deprive the locality of an open play and recreational space.
- It is within a flood risk zone.

I therefore request that Site C27 be deleted from the Camden Draft Plan, and that alternative more suitable accommodation be found for the proposed occupiers.

Yours faithfully,

Janet Cowen

Address: [redacted]

[redacted]

--

Janet Cowen

[\[redacted email\]](#)

Date: Mon, 23 Jun 2025 09:54:28 +0000
From: Ruth Adkin
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

I believe that site allocation C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

This is because:

1. The site is used by residents of Constable House as open space and is a valuable amenity area in such a dense urban location.
2. The site is an important local green/open space with mature trees and wild flowers. It has been planted as part of the Communi-Trees project and involves local young people who are appointed to look after the trees.
3. The area is used as a play space for local residents, which would be lost.
4. The site is overlooked on all sides which impacts privacy.
5. The site lies within a flood risk zone, contrary to para 13 Government Traveller Sites Planning Policy.
6. There is no independent access, which would cause disruption to Constable House residents.
7. It seems that no consideration has been given to whether there are places at nearby schools.
8. There has been no consultation with local residents.

Kind regards

Ruth Adkin

Address: [redacted address], [redacted] [redacted postcode]

[redacted]
Email address: [redacted email]

Responder 96

Date: Mon, 23 Jun 2025 10:53:21 +0000
From: Zoe Russell
To: planningpolicy@camden.gov.uk
Subject:

I'm emailing regarding the proposed development of land east of Constable house.

I have to say I would be against it being used as a gypsy and travellers site for a number of reasons

- 1) Camden already has a very high crime rate and knife crime.
- 2) The borough has gone down hill with flytipping and generally looking very dirty as it is without adding a site for gypsies, travellers etc which ends up run down and filthy
- 3) instead a better play area for all local children to enjoy would be better suited for all local children and visitors to Camden (as most dont have gardens) or an active community centre that can provide activities etc to keep children and youth engaged rather than roaming streets and getting themselves into trouble.

I think it would be a massive shame to waste the space and run Camden even further into the ground, as well as put people of going to Camden after the council have gone to the trouble of pedestrianising it.

We have so many homeless people in tents at the side of the street and I do not see Camden creating a space for them to put their tents, instead they are moved on or left on public footpaths with no toilets or wash facilities.

Kindest Regards

Zoe Holtom

[Yahoo Mail: Search, organise, conquer](#)

Responder 97

Date: Mon, 23 Jun 2025 11:57:57 +0100
From: [redacted]
To: [redacted]
Subject: Objection

PERSONAL DETAILS

Name: S Jay
Address: [redacted address], [redacted postcode]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:
Chapter 4 Central Camden: Table 5
Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

:
Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area particularly in such a dense urban location

It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi Trees planting. It would also involve the removal of substantial numbers of mature holly trees between 30 and 60 depending on the exact site. .

Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5 [redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

Flood Risk The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy. There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place. There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas

of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems. Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

[I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.]

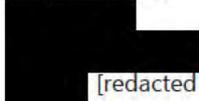
Date: Mon, 23 Jun 2025 11:05:08 +0000
From: John Roberts
To: PlanningPolicy
Subject: Eton College Road, Constable House

Surely this small but much appreciated open, green, space is of great value as a local amenity and should be preserved as such? There must be other possibilities in Camden that would do less damage to the local environment for the residents of both Constable House and other properties nearby, and that would be more pleasant and acceptable for the potential users of this space as a traveller site.

1. It would surely be a tragedy to lose this green space, which must be of particular value to the residents of Constable House as well as improving the environment for occupiers of other houses and flats in the vicinity. It has fine trees for example.
2. Is this space really large enough for the purpose? It seems very narrow. It would hardly be convenient for the travellers themselves to be squeezed into a highly restricted area.
3. Is this not a play area for Constable House? With busy roads nearby the children of Constable House would be pushed out into busy roads.
4. The plot is overlooked from all sides. Will that be fair for the new occupants?
5. Has sufficient consideration been given to the restricted access to this plot, which is also hemmed in by access to other buildings and parking in Eton College Road.

I would be grateful if you would take cognisance of these points in reconsidering this dreadful idea.

Dr John Roberts



[redacted postcode]

Responder 99

Date: Mon, 23 Jun 2025 11:05:59 +0000

From: Imogen Prowse

To: PlanningPolicy

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
22 July 2025

By email to planningpolicy@camden.gov.uk

Ref: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Dear Planning Team, I would like to object to the plan to make the land east of Constable House in Adelaide Road a Gypsy & Traveller site.

1. its already crowded with various properties overlooking the location, and the new development next to Chalk Farm tube
2. It will take away some of the existing amenities to local residents
3. Trees have recently been planted, the area is full of wildflowers and is part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council, and provides much needed community involvement.
4. Development would mean the loss of the playground used by residents of Constable House and also other nearby residents. It's the only one available in the immediate area
5. the location is next to a main road, railway line and an area of high footfall
6. it will mean the loss of green space in the immediate area.
7. I have concerns over the potential impact on the local community, the surrounding areas, and the extra burden on an already stretched police force.
8. The proposed site lies within a flood risk zone and allowing development would be against existing policy.
9. There is only one entrance which could mean congestion to Constable House, and The Etons across the road
10. There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.
11. Allowing this development seems inconsistent with existing policy priorities (to provide new and/or improved sport and leisure facilities for young people; deliver new and enhanced areas of open space and play space, and improved access to nature; enhance greening and biodiversity, and deliver flood mitigation measures and sustainable drainage systems.
12. There does not appear to have been any consultation with local residents (we did not receive any notification – being a neighbouring property) in relation to the proposed use of this site.

Conclusion

Based on the reasons listed above, I believe the Camden Draft Plan should be modified by the deletion of site C27.

Yours faithfully,

Imogen Prowse

Responder 100

Date: Mon, 23 Jun 2025 13:15:02 +0100
From: Sanja Jovic
To: [redacted]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Subject: Concerns surrounding safety in the Etons on Eton College Road

Date: 10 June 2024 at 14:35:57 BST

To: [redacted email], [redacted email], [redacted email]

Dear Cllrs Atolagbe, Djemai and Filer,
I hope this message finds you well.

I am writing as a [redacted]

[redacted] The extensive grounds and communal garden, a rare amenity in our inner London borough, have been a significant factor in my decision to reside here, providing a much needed sanctuary over the years.

However, while the location's openness is appealing, it has also led to several concerning issues impacting the safety of myself and my neighbours. The three large driveways on both the Haverstock Hill and Eton College Road sides have unfortunately become a draw for drug activity. Recently, a tragic incident occurred where someone died from a drug overdose on our property. The seclusion of our site seems to attract non-residents who use our grounds for drug exchanges and consumption, away from public scrutiny.

The presence of children and elderly residents in our development heightens these concerns. There is a constant worry about what children might encounter on the grounds, particularly in areas like the car park or communal gardens.

Additionally, we have observed a troubling rise in thefts. Unauthorised individuals have been entering our building, often by following or impersonating delivery drivers, and stealing packages intended for residents. This situation has understandably left many of us feeling unsettled and vulnerable in our homes.

I appreciate your attention to these matters and would be very grateful for any solutions you could propose to enhance the safety and security of our environment.

Thank you for your time and consideration.

All the best

Sanja Jovic

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 23 June 2025 13:23:33

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Dear Planning Officer,

Subject: Camden Local Plan: Objections to Site C27 – Constable House/Adelaide Road (Gypsy and Traveller Site).

My name is Vivienne Harris my address is [REDACTED], telephone number is [REDACTED] and email address is [REDACTED]

I am objecting to the modification proposed for the land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation.

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

My reasons are as follows:

The Amenity space connected to housing estates. The proposed site forms part of the open space used by and for use of Constable House and other local residents. It also poses a serious loss to the local residents, not only for the residents of Constable House, but also for the wider area, in such a populated urban position

The Local Green Space /Open Space with mature trees and wild flowers. As you are aware the green space has recently been planted with a number of fruit trees and an area of wild-flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. As well as providing small orchards across the borough, the scheme also involves local young people to look after the trees. The proposal for this site would involve the removal of all the Communi-Trees and the removal of numerous, mature holly trees – somewhere in the region between 30 and 60 depending on the exact location and would remove the sense of wellbeing the nurturing of the trees has created for the local youngsters who form part of this scheme. With the current 'green agenda' and the emphasis on re-wilding and bringing nature back into our lives this would prove of great detriment to the environment and our children. If we don't teach children about nature, how are they supposed to learn ?

Furthermore, there seems to be no evidence that consideration has been given to the availability at nearby **schools**. The site is therefore even more unsuitable on a number of levels.

With no independent access to the site and the serious disruption likely to be caused to residents of Constable House it would seem that further thought is required in relation to these proposals. Additionally, access would be difficult and almost immediately opposite the access to a large block of flats, namely Eton Place.

The playground area was constructed specifically for the residents of Constable House and is currently used as such. For a number of years, as well as identified on OS Maps as a playground. It continues to serve as a valuable play area for Constable House and local residents and in the event it is developed, it will be lost without any substitute, with no alternative available sites nearby. It is the children who will suffer most in this regard and with so much recent anti social behaviour in the vicinity removing play areas and public spaces with only exacerbate the problem.

The proposed site is overlooked on all sides. Camden must be aware that Constable House, the residents of Provost Road, residents of the 6 storey Etons plus the new residential block under construction on land at 5-17 Haverstock Hill and by residents of Primrose House and Bridge House, Adelaide Road. Adelaide Road which adjoins the site to the south is an extremely busy road and bus route which also has implications for the privacy of the site.

Lastly, the site lies within a flood risk zone (and has been recently flooded across the play area). This is also contrary to paragraph 13 of the Government Traveller Sites Planning Policy.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

It is also noted that there has also been no consultation with local residents in relation to the proposal and that most local residents, including of the Etons and Constable House, are still unaware of your plans.

For the reasons listed above, the Camden Draft Plan should be modified by the deletion of site C27.

Yours sincerely,

Vivienne Harris



Responder 102

Date: Mon, 23 Jun 2025 13:28:45 +0100
From: Catherine Cajone
To: [redacted]
Subject: Land adjacent to Constable House

We write to support the Adelaide Road Tenants Association's opposition to the proposal to allocate land adjacent to Constable House as a gypsy and traveller site.

It would be ridiculous to put a site like this in the middle of a densely populated urban area. It would inevitably increase traffic congestion and will reduce leisure space.

The site is used by local residents as an informal play and communal space.

And it is immediately overlooked from the multi-storey residential blocks of Constable House and neighbouring buildings in an already high density housing area.

Yours faithfully,

Catherine Cajone and Michael Johnson




[redacted postcode]

Responder 103

Date: Mon, 23 Jun 2025 14:04:29 +0100
From: sarah lowe
To: [redacted]
Subject: Proposed C27 travelers encampment Adelaide Road NW3

[You don't often get email from [redacted] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

Dear Camden Council,
I believe the consultation period is still open for this proposal, so I want to make my opposition to this.
Earlier this year we rented a flat [redacted] & moved on because of the excessive noise generated by homeless people on this corner at all times of the day & night. This camp will be noisy!
Travelers passing through, that the community have no idea who they are because they are constantly changing, will make residents uneasy or even unwelcoming towards them. This makes everyone more unsafe.

Chalk Farm is not an affordable area to live, how will the inability to access affordable food enable people to look after themselves? Will there be the need to create amenities to service this camp? Will it be visible from the street? If so it will be a blight on such a tourist attraction area.

We [redacted] & will pass this corner daily, [redacted]
[redacted]
[redacted] we are encouraged by the government not to give money directly to people begging/selling without licenses, [redacted]
[redacted]

I do not think a site so close to a tube station is the right location.
The Council encouraging travelers to locate so close to Central London doesn't make any sense.

Thank you.
Sarah Lowe

[redacted].
Sent from my iPhone

Responder 104

Date: Mon, 23 Jun 2025 14:34:16 +0100
From: Andrew Darwin
To: [redacted]
Subject: Objection to relocation of Regis Road Recycling Centre

I write in objection to the proposed relocation of the Regis Road Recycling Centre.

I object for the following reasons:

1. The location is too close to residential properties. I live [redacted] and the proposed site would be very close to my residence, with our balcony and outdoor area of our flat facing towards the proposed site. This would affect our quality of life.
2. Environmental concerns regarding noise and dust pollution from the site, especially given our outdoor space faces directly towards and is very near the site itself.
3. Damage to our community character. As Kentish Town, especially the Regis Road area, is becoming more residential with mixed use sites becoming more prevalent as the area changes, the heavy industry type of site that the Regis Road Recycling Centre is increasingly doesn't belong in this area. I don't care if it moves to elsewhere in the borough, with the proposed plans for redeveloping the Regis Road area becoming a greener, more residential and mixed use space, having a recycling centre for waste disposal here just doesn't fit the direction the area is going in.
4. Lack of meaningful consultation - no community consultation has been given around the relocation of the site within the Regis Road estate. It was inserted into the final version for the first time without any prior consultation. The only prior consultation was around whether residents wanted to keep it or not, and I believe there was a desire to keep it - however no mention of moving it to close proximity of residential and retail areas of Kentish Town were never part of the consultation. Proper consultation with residents should be allowed to provide a sufficient voice for local residents helping shape the local area to best suit our needs and quality of life.

Best wishes

Andrew Darwin
[redacted]

Responder 105

From:
To:
Cc:
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road
Date: 23 June 2025 14:37:01

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

For the reasons listed below, the Camden Draft Plan should be modified to by the deletion of site C27 (Chapter 4 Central Camden: Table 5; Chapter 7: Meeting Housing Needs: Policy H11; Draft Policies Map and Schedule of Proposed Local Plan Site Allocations)

REASONS

- **Loss of amenity space.** The site forms part of the open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- **Loss of local green/open space with mature trees and wild flowers** planted as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. The scheme provides orchards across Camden and involves local young people who look after the trees. The proposal would involve the removal of the Communi-Trees planting and a substantial number of mature holly trees.
- **Loss of playground.** The area was constructed as a play area for the residents of Constable House and is used as a play space. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking.** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

Flood risk. The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.

- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.
- **Consultation:** There has been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Yours sincerely

Barry and Deborah Isaacs

[Redacted signature]

From: [REDACTED]
To: [PlanningPolicy](#)
Cc: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 23 June 2025 15:03:11

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Joseph and Rebecca Gourgey

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has

historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk** –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

From: 
To: [PlanningPolicy:](#)
Subject: Site Allocation C27 - Land East of Constable House, Adelaide Rd (Gypset and Traveller Site) of Draft Local Plan
Date: 23 June 2025 15:08:10

You don't often get email from  [Learn why this is important](#)

Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

PERSONAL DETAILS

Name: Natalie Bickford

Address: 

Telephone number: 

Email address: 

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area – particularly in such a dense urban location
- It is also an important **Local Green Space /Open Space with mature trees and wild flowers:** the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO

a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees – between 30 and 60 depending on the exact site. .

- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- **Overlooking:** The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- **Flood Risk –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.**
- There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby **schools**.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see *Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds*). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

Yours sincerely

Natalie Bickford

Responder 108

From: 
To: 
Subject: Re; Objection to PROPOSED TRAVELLERS" SITE CHALK FARM
Date: 23 June 2025 15:23:18

You don't often get email from  [Learn why this is important](#)

[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.

To Member of the Council,

I strongly object to the proposal of a Travellers' Site in Chalk Farm.

Camden Town is already overrun with the homeless and lawless too without adding to the strain on resources and danger to the local residents and others. Many of us no longer venture out in the evenings.

I believe as a ratepayer and resident this is a foolhardy and highly inappropriate and irresponsible proposal. I would argue that it should be cancelled immediately.

Regards,

Homeowner and landlord in Camden,

Nouritza Matossian

Date: Mon, 23 Jun 2025 14:44:38 +0000
From: Jerome Petit
To: planningpolicy@camden.gov.uk
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) of Draft Local Plan

This email is an outline to an Objection/Representation for the site mentioned in the subject in the Draft Plan and propose a modification - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation from 1) Chapter 4 Central Camden: Table 5 2) Chapter 7: Meeting Housing Needs: Policy H11 and 3) Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Reasons are multiple:

- Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location
- It is also an important Local Green Space /Open Space with mature trees and wildflowers: the green space has in the last few months been planted with a number of fruit trees and an area of wildflowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .
- Playground: the area was constructed as a play area for the residents of Constable House and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.
- Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.
- Flood Risk -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.
- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.
- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents, from Constable House and neighbouring Etons, in relation to the proposed use of this site.

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.

Regards,

Jerome Petit | [redacted address].

[redacted]

Responder 110

Date: Mon, 23 Jun 2025 14:49:39 +0000
From: Maureen Betts
To: PlanningPolicy
Subject: Draft Plan answer

Maureen Betts

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Miss"/>	<input type="text"/>
First Name	<input type="text" value="Maureen"/>	<input type="text"/>
Last Name	<input type="text" value="Betts"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="████████████████████"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="██████"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="████████████████"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="NO"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Primrose Hill ward falls under Camden Central in Chapter 4. Relevant sites in/on the edge of our ward are C24, C26 and C27.

RE C27. The proposed gypsy & traveller site near Chalk Farm is not legal. Also it is right outside blocks of flats, next to a large corner building site and a busy thoroughfare from Chalk Farm Tube. Also Adelaide Road has suffered a lot of disruption from HS2 works and is still partially blocked. I object to this area being used for gypsy & traveller site - it is not an appropriate area for such a site and would be illegal. A more suitable site in a rural area should be considered.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	
(b) when the Inspector's Report is published	
(c) when the Camden Local Plan is adopted	

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:	Maureen Anne Betts	Date:	23 June 2025
----------------	--------------------	-------	--------------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 111

Date: Mon, 23 Jun 2025 15:04:15 +0000
From: Justine Waldie
To: planningpolicy@camden.gov.uk
Subject: Objection to Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

To whom it may concern,

I would like to add my objection to the proposed creation of the Gypsy and Traveller site next to Constable House, Adelaide Road, Chalk Farm.

I believe it will destroy the neighbourhood ambience and cause a lot of problems with the surrounding residences.

The land area (which is surprisingly small to add more homes) designated is part of Constable House, and is currently a play park with many beautiful trees and shrubs which will be lost.

I have also seen there have been special tree planting done there by Camden Council, so it would be sad to see all of that go to waste.

And it is right on a busy road so would be dangerous if there are a lot of children out playing.

It is overlooked by the [REDACTED] and other residences, including the new building next to the tube, and will, to be perfectly honest, be extremely detrimental to the value of those properties which will cause a lot of upset to the people who have spent their lives building up funds to buy homes in this beautiful area.

We have already been subjected to the Hs2 works which have been and will be, going on for years.

It seems it will also need to share access with the residents of Constable House- have they been informed of this?

There are already a lot of issues with aggression/substance abuse in this area as it is so close to Camden/Chalk Farm, and this will only be exacerbated by more people living in an already densely populated area.

Will there be extra police allocated to this area?

Please take these things into consideration as it will affect the lives of hundreds of people, including many elderly folk who have been in the area for decades.

Kind regards,

J Waldie
[REDACTED]

Date: Mon, 23 Jun 2025 15:23:03 +0000
From: CERNOVSKY, Jan [REDACTED]
To: planningpolicy@camden.gov.uk
Subject: Objection to the Proposed Traveller Site near Chalk Farm Station

I am writing to strongly object to the proposed traveller site adjacent to Adelaide Road, near Chalk Farm Underground Station. This proposal is wholly inappropriate for a number of compelling reasons, which I outline below:

1. Overdevelopment and Density Concerns

This is already a densely built-up area with multiple high-rise residential developments either under construction or in the planning pipeline-particularly at Chalk Farm tube station and near The Roundhouse. The addition of a traveller site would significantly exacerbate the existing strain on local infrastructure and public services.

2. Pressure on Public Services

The NHS, social services, and local schools in this area are already under immense pressure. Adding more residents-particularly without adequate infrastructure planning-will only deepen this strain, to the detriment of both existing residents and new arrivals.

3. Traffic and Road Safety Issues

The site is located directly adjacent to Adelaide Road, a notoriously busy arterial route. Although traffic has temporarily eased due to HS2 works, this is not a long-term change. The proposed access point-near the junction with Eton College Road-will create a dangerous bottleneck and further congestion. It is also immediately next to a busy pedestrian zone at Chalk Farm Station, increasing risks for both drivers and pedestrians.

4. Loss of Green Space

The land in question provides rare and valuable green space in a tightly packed urban environment. Its loss would significantly reduce the quality of life for local residents, who already contend with high noise and pollution levels. Green space is not a luxury in central London-it is a necessity.

5. Unsuitable Environmental Conditions

Adelaide Road is prone to flooding, which makes it a wholly unsuitable location for mobile homes or temporary structures. This creates serious health, safety, and practical concerns for any potential occupants.

6. Location is Incompatible with Traveller Needs

Traveller sites should be located in areas that offer a balance of accessibility and habitability. This site is neither. It is in the heart of central London, surrounded by high traffic volumes, dense development, and a lack of usable outdoor space. It would not offer the dignity or sustainability that a traveller community deserves.

In summary, the proposed location is ill-suited for a traveller site and would create negative consequences for both the existing local population and the potential occupants of the site. I urge you to reconsider this proposal and explore alternative, more appropriate locations.

Dr Jan Cernovsky

Date: Mon, 23 Jun 2025 16:33:20 +0100
From: Joan Lockwood
To: [redacted]
Subject: Objection to Proposed Use of Green Space Near Chalk Farm for Gypsy and Traveller Site

I am writing in response to your consultation as seen locally signposted around 20th June... regarding the potential designation of a green space near Chalk Farm Station as a Gypsy and Traveller site, as outlined in your Site Identification Study. I am submitting a formal objection to this proposal on several grounds, including environmental, community and procedural concerns.

The space in question (Eton College Road) has been actively developed in recent months for a wildflower garden by a local school, providing both ecological and educational value. This initiative is not only a community achievement but a new green asset in the neighbourhood. Reallocating this land for another purpose would undermine the time, energy and intention invested by local educational groups.

Beyond the new garden, this small but vital green area serves as an informal community hub. It's a popular pickup place for Lime Bikes and a local spot where people gather for lunch, rest or simply enjoy the outdoors, sitting along the low wall. These everyday uses would be entirely lost under the proposed development, revoking access to the only green public space for residents near that vicinity on Adelaide Road and Eton College Road.

There is also a pretty serious flood risk. When we have hard downpours, all of the water streams to that area, raising concerns of long-term sustainability and health for residents in that spot. Moreover, the location borders a major ongoing construction site adjacent to Chalk Farm Tube station that just started with years to complete and we have already endured HS2-related disruptions since 2019 removing access to a large portion of the road.

Adding further pressure to this location, already subject to noise, dust, and further restricted access, is unfair to both current residents and occupants of this site.

I also want to express my concern over the tiny window given for responses: 20th to 27th of June. This is wholly inadequate for any meaningful community engagement on a matter of this scale.

To be clear: this objection is not against the principle of providing accommodation for Gypsy and Traveller communities. It is about the inappropriateness of this specific site given its environmental role, high community value, existing pressures and infrastructural unsuitability.

I respectfully urge Camden Council to reconsider this site and extend the consultation process to allow for proper community involvement in determining more appropriate and sustainable alternatives.

Here are photos to back up my objections:

New wildflower garden

another view of the garden, including new trees planted

the wall from where the Lime Bikes are located and all the way round are frequently used by locals to enjoy the outdoors.

you can see people sitting on the wall in the distance or have just left.

Thank you for your time and consideration.

Best wishes,

Joan

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Ms."/>	<input type="text"/>
First Name	<input type="text" value="Joan"/>	<input type="text"/>
Last Name	<input type="text" value="Lockwood"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="Camden"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Site C27 should be deleted from the following:
 Chapter 4 Central Camden: Table 5
 Chapter 7: Meeting Housing Needs: Policy H11
 Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Reasons:

- The plot is next to Chalk Farm station, which is also a busy route to Primrose Hill and a high-traffic area.
- It was recently designated for a local school's wildflower garden project.
- Serves as the only social green space and Lime/Forest Bike pick-up area on Eton College Road and Adelaide Road.
- Borders' major ongoing construction of a new multi-story property has been underway in the local area since 2019, subject to disruption from HS2.
- This area floods with heavy downpours. A Constable House flat caved in due to the building being built over water.
- Lack of privacy for residents/future occupants. Many residential buildings, including Constable House, The Etons, houses on Provost Road, and Bridge House, overlook the site. Plus, the location offers no seclusion or quiet. Families living there would be in full view of residents in the area.
- The consultation was rushed, signposted to local residents on 20 June with a 27 June deadline.

Local school wildflower garden & new tree planting project



Social green space and bike pick up area:



(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Remove the green space adjacent to Chalk Farm station on Eton College Road from the list of proposed Gypsy and Traveller sites due to ecological value, existing community use, flood risk, proximity to major ongoing construction, and inadequate privacy or infrastructure to support future residents.

Justification:

This site does not meet basic criteria for suitability or sustainability and its inclusion appears to contradict the Council's stated commitments to biodiversity, public realm and community wellbeing. Retaining this site undermines public trust and fails to meet sound plan making principles under the NPPF, including being positively prepared, justified and effective.

Extend Public Consultation periods for site-specific proposals to be a minimum of 21 days. We only heard about the plans when sign posted 22nd of June.

Justification:

The current 7-day window is unreasonable and fails to uphold procedural fairness. Extending the consultation period will demonstrate transparency, improve engagement, and ensure the duty to cooperate is met in practice not just policy.

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	x
(b) when the Inspector's Report is published	
(c) when the Camden Local Plan is adopted	x

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:



Date:

24/06/2025

Responder 115

Date: Mon, 23 Jun 2025 16:39:00 +0100
From: martin foster
To: [redacted]
Subject: Traveller site Eton college road

[You don't often get email from Learn why
this is important at <https://aka.ms/LearnAboutSenderIdentification>
]

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.

To whoever it may concern. (Probably not many in this council)
The proposed gypsy/traveller site at the junction of Eton college road and Adelaide rd.
Has anybody in this weak council got the minerals to realise this is a terrible idea. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
You should be embarrassed to even consider this.

Sent from my iPhone

Responder 116

Date: Mon, 23 Jun 2025 16:09:59 +0000
From: Pam White
To: PlanningPolicy
Subject: Draft Local Plan representation

Pam White

[redacted email]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s). Please use a separate page for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="P J"/>	<input type="text"/>
Last Name	<input type="text" value="White"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="██████"/>	<input type="text"/>
Post Code*	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="██████████"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input style="width: 60px;" type="text" value="x"/>	No	<input style="width: 60px;" type="text"/>
(2) Sound	Yes	<input style="width: 60px;" type="text"/>	No	<input style="width: 60px;" type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 60px;" type="text"/>	No	<input style="width: 60px;" type="text" value="x"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input style="width: 60px;" type="text" value="x"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input style="width: 60px;" type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 60px;" type="text" value="x"/>
(4) Consistent with national policy	<input style="width: 60px;" type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

[REDACTED]

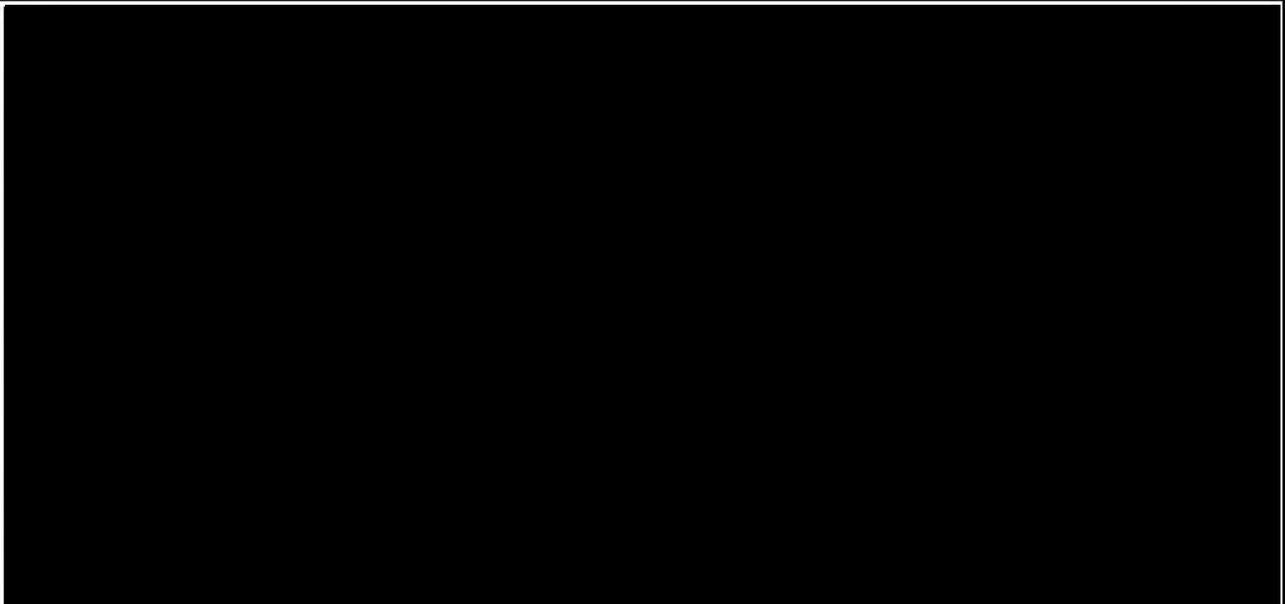
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



P J White



(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

This part of the Draft Local Plan in H11, pages 294-5 on the Travellers Site in Adelaide Road needs to be removed from the Draft Local Plan submission in order to make it at all acceptable or sound.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	
(b) when the Inspector's Report is published	
(c) when the Camden Local Plan is adopted	

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:	P J White	Date:	23.06.25
-----------------------	------------------	--------------	-----------------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 117

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road - Gypsy and traveller site
Date: 23 June 2025 17:35:25

You don't often get email from [REDACTED] [Learn why this is important](#)

[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.

Hello all,

Name: Sophie Petrocochino

Address: [REDACTED]

Number: [REDACTED]

I am writing to express my strong objection to the proposed designation of Site C27 for use as a Gypsy and Traveller site, as outlined in the draft Camden Local Plan. This site serves an essential role within the community as a green, recreational, and communal space for local residents, and its development would result in numerous detrimental impacts.

My reasons for objecting to this proposal are as follows:

Essential Community Green Space

The site currently acts as open amenity space supporting Constable House and surrounding homes. In an already densely populated part of Camden, this green area offers vital room and outdoor space for residents who otherwise lack access to private gardens. Developing this land would strip the community of a rare and much-needed area of open space, directly impacting local quality of life.

Environmental and Ecological Value

The land is home to mature trees and has recently been enhanced through the Communi-Trees initiative – a collaborative project involving Camden Council, Think & Do, and the KOKO Foundation. As part of this scheme, fruit trees and wildflower areas have been planted with the involvement of local youth, building environmental awareness and stewardship. The proposed development would erase this work entirely and involve the removal of a significant number of established holly trees – with estimates ranging from 30 to 60 – resulting in a major loss of local biodiversity.

Loss of Children's Play Space

This space was originally created as a designated play area for Constable House and continues to be used as such. Historical maps identify it as a playground, and it remains a well-used community asset. The proposed development would remove this play space permanently, with no replacement provision and no viable alternatives nearby. This would particularly disadvantage young families in the area.

Lack of Privacy and Overlooking

The site is entirely overlooked by residential buildings on all sides:

Constable House (4–5 storeys) to the east
Homes along Provost Road to the north
The Etons (6 storeys) and a new development on Haverstock Hill to the west
Primrose House and Bridge House on Adelaide Road to the south

Flood Risk Concerns

This site lies within an area identified as at risk of flooding and has experienced flooding in recent months, including across the play area. Its inclusion as a potential residential site is inconsistent with paragraph 13 of the Government’s Planning Policy for Traveller Sites, which cautions against locating such developments in areas with known flood risk.

Access Constraints and Disruption

There is no direct or independent access to the site. Any attempt to construct or maintain access would inevitably cause disruption to Constable House residents and raise safety and traffic concerns, especially as the proposed access point would be positioned directly across from Eton Place.

Educational Capacity Not Considered

There is no evidence that any assessment has been made regarding the availability of local school places. This is a key issue if the site is to accommodate families with children.

Failure to Apply Site Selection Criteria

Many of the key constraints outlined in Table 1 of the Gypsy and Traveller Site Identification Study appear to have been overlooked, including:

- Use of council housing land and residential gardens
- Designation as a Local Green Space and playground
- Privacy concerns due to overlooking
- Environmental value of the green space
- Flood risk

The proposal also runs contrary to multiple goals within the Camden Draft Plan, which commits to:

- Expanding access to green and recreational spaces
- Improving play and sports facilities for young people
- Supporting biodiversity and greening initiatives
- Enhancing flood resilience through sustainable drainage

Lack of Community Engagement

To date, there has been no proper consultation with local residents about this proposal. Most people living in the immediate area – including at Constable House and the Etons – remain unaware of the site’s proposed change. This lack of communication is deeply concerning and does not reflect fair or inclusive planning practice.

The proposed allocation of Site C27 for a Traveller site fails to meet both the technical requirements and the spirit of Camden’s own planning policies. It would result in the loss of a vital green space, undermine existing community and environmental projects, reduce access to play and recreation, increase flood risk, and impose

serious disruption on residents — all without adequate consultation or consideration of alternatives.

For these reasons, I urge Camden Council to remove Site C27 from the Draft Local Plan.

Regards,

Sophie Petrocochino

Responder 118

Date: Mon, 23 Jun 2025 17:33:16 +0000

From: Geoff

To: PlanningPolicy

Subject: Draft Local Plan - objection to Site C27 for Policy H11 - accommodation for travelers (Land East Of Constable House, Adelaide Road)

I am [redacted address], and would like to voice my objection to the allocation of Site C27 Land East Of Constable House, Adelaide Road as part of the Draft Local Plan.

I do not think that the site passes the criteria for use.

The site is overlooked on several sides by high rises, The Etons, Constable House, the houses on the opposite side of Adelaide Road and the new development next to Chalk Farm station.

There is currently no vehicular access, and the land itself is not large enough to provide adequate space for a traveller site.

The space is currently used by the local residents as outdoor green space and sports pitch, considering that the area is a high density block of flats, it would mean the loss of a much used local amenity.

From the Draft Local Plan, there has not been a lot of information provided as to how the selection process was undertaken and the methodology used, unlike other sites, which warranted a page each, this and others were relegated to a single line.

Review of the Site Selection Topic Paper and the site identification study shows that a lot of sites that had similar issues were cut from the selection process, it would be good to have more visibility over why this site remains on the list. Other than a small amount of bushes providing some cover, the Site Identification Study fails to mention the new block of flats being built that will also overlook the site or Constable House itself, only referring to the Etons, which has a clear view of the site despite the vegetation.

To conclude, I believe that this site does not pass the requirements needed for a site of this nature, overlooked by neighbouring buildings, loss of green space, access requirements, and the size required for a site of this nature. I would like for this site to be removed from the Local Plan Submission draft and that the Council investigate and find more appropriate sites for them, whether it be from the original site list, or from the identification of new sites.

Many thanks,

Geoff Yang

Responder 119

Date: Mon, 23 Jun 2025 18:50:34 +0100
From: Bella Tidswell
To: [redacted]
Subject: Camden Regulation 19 Consultation - Representations on behalf of
Harrison Varma Projects Ltd

Principal Planner

[redacted]

[redacted]

[redacted]

This message is intended for the addressee only and may contain private and confidential information or material which may be privileged. If this message has come to you in error you must delete it immediately and should not copy it or show it to any other person. HGH Consulting is a trading style of Hepar Grincell Limited. Registered in England & Wales: 9340687. Registered address: [redacted address], London, [redacted postcode].



Planning Policy
Camden Town Hall
Judd Street
London
WC1H 8EQ

via email: planningpolicy@camden.gov.uk

23 June 2025

Dear Sir/Madam,

Camden Local Plan - Proposed Submission Draft 2025

I am writing on behalf of my client, Harrison Varma Projects Ltd, to provide representations on the Proposed Submission Draft of the Emerging Local Plan. Harrison Varma Projects Ltd has an interest in the Former Mansfield Bowling Club which is identified as a draft allocation in the Local Plan (reference N2).

Our client welcomes the inclusion of the Former Mansfield Bowling Club within the draft Local Plan. It is an accessible, sustainable brownfield site with significant potential for redevelopment. However, as drafted the site allocation is not justified/effective and therefore not sound.

An indicative capacity of 23 homes is presented. This is based on a previous planning permission granted in 2017, which has been implemented. While this is a logical approach, the site is capable of accommodating significantly more than 23 new homes; feasibility work prepared by the architects DSDHA indicates that a capacity of c. 50-70 new homes could be achievable. The 2017 permission was granted in a different context and prior to the publication of the 2021 London Plan. Camden’s 2025 Local Housing Needs Assessment indicates a significant need for housing in the borough over the next 15 years, with a total projected increase of 9,700 new households. In light of this and the requirement within the allocation (and within the London Plan 2021) to ‘optimise residential provision on site’, it would be appropriate to increase the indicative capacity to ‘50-70 additional homes’; as drafted the policy could encourage a proposal to come forward which fails to optimise the site’s capacity.

The site allocation states that the site is suitable for “permanent self-contained homes/or specialist care home, open space and sports facilities”. These uses reflect the planning permission at the site and the live application for a care home development. However, this is considered overly restrictive on the basis that the site could be suitable for a range of uses within the use classes C2 and C3, including, for example, a co-living scheme. The LHNA indicates that over the fifteen year period to 2040, most of the net household growth will be in the form of single person households, and newly built housing will typically be occupied by younger households. Innovative housing models such as co-living can meet the needs of many younger and single person households. To ensure the allocation is both justified and effective, the wording should be changed as follows:

“Allocated Use: ~~permanent self-contained homes/or specialist care home~~ residential development in use classes C2/C3, open space and sports facilities”





The final bullet point within the allocation under 'Other Considerations' refers to substantial demolition taking place on the site. The former building on site has been demolished under the 2017 permission, therefore no applications coming forward would propose substantial demolition and this bullet point should be removed.

Subject to the changes above, the allocation is wholly supported by our client who intends to bring a new application forward for residential development at the site in the near future.

Separately, it is noted that at paragraph 4.102 of the 2025 LHNA, it is suggested that the London Borough of Camden has undertaken its own assessment of the need for housing for older persons, those seeking shared accommodation, students and those seeking to build their own homes. However, this assessment has not been published as part of the evidence base to support the emerging Local Plan. To ensure the Local Plan is sound, it should be supported by up-to-date evidence on the need for specialist housing for these groups, and this assessment should be made publicly available.

Should you have any queries please do not hesitate to contact me [REDACTED]
[REDACTED]

Many thanks,



Bella Tidswell
Principal Planner

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text" value="Bella"/>
Last Name	<input type="text"/>	<input type="text" value="Tidswell"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 1*	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text" value=""/>
Post Code*	<input type="text"/>	<input type="text" value=""/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

Part B – Please use a separate page for each representation

Name or Organisation: Harrison Varma Projects Ltd
--

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph	<input type="text"/>	Policy	<input type="text" value="N2"/>	Policies Map	<input type="text"/>
-----------	----------------------	--------	---------------------------------	--------------	----------------------

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="checkbox"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" type="checkbox"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Please refer to covering letter.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Proposed amendments to Policy N2:

Allocated use: ~~permanent self-contained homes/or specialist care home~~ residential development in use classes C2/C3, open space and sports facilities

Indicative Housing Capacity: ~~23 additional homes~~ 50-70 additional homes

[...]

~~Proposals involving substantial demolition will be required to submit a pre-demolition audit in accordance with Policy CC2 (Retention of Existing Buildings) and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).~~

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	X
(b) when the Inspector's Report is published	X
(c) when the Camden Local Plan is adopted	X

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	21 June 2025
----------------	---	-------	--------------

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 120

Date: Mon, 23 Jun 2025 18:44:04 +0000
From: Catherine Pace O'Shea
To: PlanningPolicy
Subject: Formal objection to site allocation C27 - Land East of Constable House ,
Adelaide Road

[You don't often get email from c [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

Hello

I have only just heard about this proposal and am writing to express my objection.

I am concerned that this space is overlooked by multi storey residential blocks which would undermine the privacy of any potential occupants.

The site is also in an already congested area and I cannot see how trailers, service or emergency vehicles can be accommodated.

Please reconsider this application and consider a more appropriate option.

Thank you

Catherine Pace O'Shea

Responder 121

Date: Mon, 23 Jun 2025 18:47:47 +0000
From: susan blum
To: PlanningPolicy
Subject: PLANNED GYPSY / TRAVELLER SITE NEXT TO CHALK FARM STATION
- ADELAIDE ROAD AND ETON ROAD INTERSECTION

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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.

THIS IS NOT TO BE DONE. THE PROPOSED SITE IS NEAR ETON ROAD AND ADELAIDE ROAD AND IS A RESIDENTIAL AREA. GYPSY / TRAVELLER DWELLINGS MAY LEAD TO DISRUPTION BOTH ECOLOGICALLY AND SOCIALLY.

PLEASE FIND ALTERNATIVE SITES THAT ARE NOT AMIDST RESIDENTIAL AREAS

Responder 122

Date: Mon, 23 Jun 2025 18:50:16 +0000
From: ebony o'marley
To: PlanningPolicy
Subject: Traveller Site Chalk Farm

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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 do not allow this to happen, I have lived close to a traveller site before in Carol Street and it was a nightmare, to the point where I moved.

Thank you,

EoM

Responder 123

Date: Mon, 23 Jun 2025 19:06:23 +0000

From: Nikita Makarov

To: PlanningPolicy

Subject: Regarding the proposed gypsy & traveler site near the Adelaide Road

I would like to bring to your consideration some information that may be useful in deciding whether to put a gypsy & traveller site east of Constable House and next to the Adelaide Road:

1. Right adjacent to that place where the Eton College road starts is the local drug trade hub where drug deals are happening daily. That is also a frequent gathering place for the local drunks.
2. The section outline for the project was just recently beautified with flowers and trees planted.
3. Adelaide Road is a busy and loud street.

Please take these facts into consideration when deciding whether selecting this location would benefit both the local and the traveller communities.

Best regards,
Nikita Makarov

Date: Mon, 23 Jun 2025 20:20:48 +0100
From: Linn Turner
To: [redacted], [redacted], [redacted], [redacted]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

We, Mr Mike Turner & Mrs Linn Turner, [redacted]
[redacted]

object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

We respectfully request that the **Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, as it fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).**

1. Loss of Valued Community Amenity Space

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the “Communi-trees” community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas.

Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

- NPPF Paragraphs 99-101 (protection of open space);
- London Plan Policy S4 (ensuring sufficient play and informal recreation);
- Camden Local Plan Policy A2(e);
- Case law (e.g. Copas v Royal Borough of Windsor and Maidenhead [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and

future site occupants.

This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

- Camden Planning Guidance on Amenity (2021);
- Planning Policy for Traveller Sites (PPTS, 2023), Paragraph 13(c) - sites should not place undue pressure on local infrastructure or cause conflict with settled communities;
- Article 8, European Convention on Human Rights (right to respect for private and family life);
- Moore v SSCLG [2013] EWCA Civ 1194 - established that mutual amenity impacts must be weighed in Traveller site cases.

3. Flood Risk - Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden's 2021 surface water flood data as subject to risk. Traveller pitches are considered a "Highly Vulnerable Use" under Planning Practice Guidance (PPG).

The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) - sites must not be at high risk of flooding;
- Precedent: APP/B5480/A/11/2151483 (Romford) - Traveller sites refused on similar flood vulnerability grounds.

4. Access Constraints and Undeliverability

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable.

This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) - minimum access width standards; - PPTS Paragraph 13(b) - sites must be accessible and deliverable; - Equality Act 2010 - provision must not create unequal or unsafe conditions for any group.

5. Unsound Site Selection Process and Lack of Transparency

The original AECOM Gypsy and Traveller Site Identification Study (2024) shortlisted 21 parcels. Following Camden's internal filtering, only two sites were proposed for allocation in the Regulation 19 Draft Plan. However:

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds. Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and risks procedural

unfairness.

6. Conflict with GTSIS Methodology and Exclusion Criteria

AECOM's methodology for the Gypsy and Traveller Site Identification Study (GTSIS) clearly applied filters that would exclude sites:

- Within 18m of 4+ storey buildings (overlooking);
- Used as amenity or play space;
- At risk of surface flooding;
- Without safe vehicular access.

Site C27 presents all four of these exclusionary criteria and should not have progressed beyond the filtering stage. Its inclusion contradicts the consultant's own assessment logic and undermines the integrity of the evidence base.

7. Better Alternatives Exist

The failure to explain why 19 of the 21 shortlisted sites were rejected while Site C27 was taken forward is problematic. The Site Selection Topic Paper (April 2025) notes that many were excluded due to existing use, access, or amenity conflict - all of which apply equally (or more severely) to Site C27. The absence of a robust comparative analysis or scoring matrix raises concerns about the objectivity and soundness of the site selection process. The plan has therefore not met the NPPF tests of:

- Justification (why this site over others);
- Effectiveness (deliverability);
- Consistency (application of methodology).

Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to:

- The loss of essential amenity space;
- Inherent flood, privacy, and access constraints;
- A flawed and opaque site selection process.

We therefore respectfully request that:

- Site C27 be removed from the Camden Local Plan submission draft;

- The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Thanks in advance!

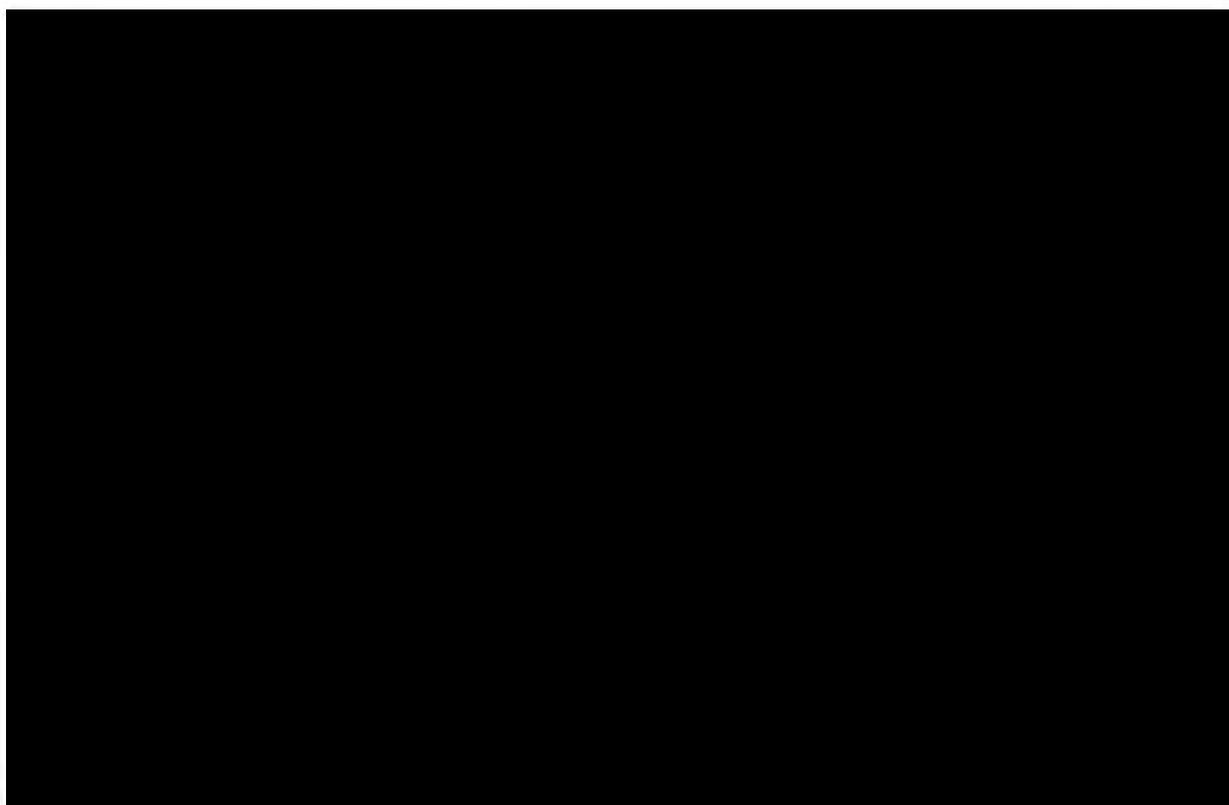
Kind regards

Mr Mike & Linn Turner

 [redacted postcode]

Responder 125

Date: Mon, 23 Jun 2025 19:49:38 +0000
From: David Wolfe
To: planningpolicy@camden.gov.uk
Subject: A discussion and a serious concern



David Wolfe



Responder 126

Date: Mon, 23 Jun 2025 20:53:35 +0100
From: Marcus Wattam
To: [redacted]
Subject: Comment to the Camden Council Draft Local Plan

We hope this finds you well and thank you for all the great work the Council does. Please find attached our one representation concerning Paragraph 4.5 of the Draft Local Plan.

Please acknowledge receipt.

Regards
Marcus Wattam

[Redacted signature block]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Planning Policy Team at Camden Council by 5pm on 27 June 2025 by:

E-mail: planningpolicy@camden.gov.uk

Post to: Planning Policy, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts –

Part A – Personal Details (You need only submit **one** copy of Part A)

Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Marcus"/>	<input type="text"/>
Last Name	<input type="text" value="Wattam"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text" value="REDACTED"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code*	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

Part B – Please use a separate page for each representation

Name or Organisation: **Adelaide Road Tenants Association**

3. Please give the number or name of the Paragraph or Policy your comment relates to, or specify if your comment relates to the Policies Map.

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – [Draft new Local Plan - Camden Council](#)
- Draft Policy Map - [Draft new Local Plan - Camden Council](#)

Paragraph Policy Policies Map

4. Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

*See guidance note at the end of the form for assistance with completing this section.

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Camden Local Plan is **unsound** because it is **NOT**:

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text" value="x"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text" value="x"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input type="text"/>
(4) Consistent with national policy	<input type="text" value="x"/>

*See guidance note at the end of the form for assistance with completing this section.

6. Please give details of why you consider the Camden Local Plan Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Objection to Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

On behalf of the Adelaide Road Tenants Association (ARTA) we object to the soundness of the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). We ask that this representation be considered as part of the Regulation 19 consultation and respectfully request that the Planning Inspector recommend the site's removal from the Local Plan on the grounds of unsoundness, as it fails the tests of justification, effectiveness, and consistency with national policy as set out in NPPF paragraph 35.

1. Loss of Functional Amenity Space Used by Residents

While not formally designated as open space or a play area, the site is actively used by local residents and children as informal play and communal space. This site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation.

Its redevelopment would reduce the quality and variety of local amenity provision, contrary to:

- NPPF Paragraphs 99-101;
- Camden Local Plan Policy A2(e);
- London Plan Policy S4;

This is reinforced by the case *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548, confirming that informal, community-used land requires policy-compliant justification before its loss.

2. Overlooking and Harm to Privacy - Amenity Impact

The site is immediately and heavily overlooked by the multi-storey residential blocks of Constable House and adjacent buildings. The resulting conditions would undermine privacy for both existing residents and potential site occupants.

This contravenes:

- Camden Planning Guidance on Amenity;
- PPTS (2023), para. 13(c);
- Article 8 of the ECHR.

Supported by *Moore v SSCLG* [2013] EWCA Civ 1194.

3. Flood Risk - Inappropriate for Highly Vulnerable Use

The site lies within a Local Flood Risk Zone. Traveller accommodation is considered a "highly vulnerable" use under Planning Practice Guidance.

Contrary to:

- NPPF Paragraph 167;

- PPTS para. 13(g).

See APP/B5480/A/11/2151483 (Romford) for precedent.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Camden Local Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Camden Local Plan Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

The proposed allocation is unsound and the plan should be modified by removing it from the plan on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

No

Yes

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

Privacy Notice

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Local Plan documents, to the Secretary of State and must be made publicly available on the Council's website.

For further information regarding how we store and process your data, please view the Council's Privacy Notice [privacy-notice-planning-feb-2025](#).

11. Signature:		Date:	
-----------------------	--	--------------	--

Notes to accompany the Representation Form

1. Introduction

The Camden Proposed Submission Draft Local Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it is submitted for examination to a Planning Inspector. Under the [Planning and Compulsory Purchase Act 2004](#) (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the [Town and County Planning \(Local Planning\) \(England\) Regulations 2012](#) (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a [Sustainability Appraisal Report](#) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above. You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Responder 128

Date: Mon, 23 Jun 2025 20:41:04 +0000
From: Gemma Perlin
To: planningpolicy@camden.gov.uk
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

Name: Gemma Perlin

Address: [redacted]
[redacted]
[redacted]

[redacted email]

OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

REASONS

· :

· Amenity space associated with housing estates. The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area - particularly in such a dense urban location

· It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees - between 30 and 60 depending on the exact site. .

· Playground: the area was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House

and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

- Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

- Flood Risk –The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary to para 13 Government Traveller Sites Planning Policy.

- There is no independent access to the site and serious disruption is likely to be caused to residents of Constable House. Access would also be immediately opposite the access to Eton Place.

- There appears to be no evidence that consideration has been given to whether there are places available at nearby schools.

The Constraints set out in Table 1 of the Gypsy and Traveller Site Identification Study do not therefore appear to have been properly applied to this site (see Council house owned homes and residential garden land; Local Green Space; Open Space; Overlooking; Playgrounds). The proposal is also inconsistent with other policies in the draft Camden Plan, which seeks to (i) provide new and/or improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

Consultation: There has also been no consultation with local residents in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified to by the deletion of site C27.

[I wish to participate at the examination hearings into the Draft Local Plan before the Inspector.]