

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="Edward"/>	<input type="text"/>
Last Name	<input type="text" value="Davies"/>	<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="London"/>	<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="E"/>	<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: 80px;" type="text" value="x"/>	No	<input style="width: 80px;" type="text"/>
(2) Sound	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" 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: 100px;" 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: 100px;" 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: 100px;" type="text" value="x"/>
(4) Consistent with national policy	<input style="width: 100px;" 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]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

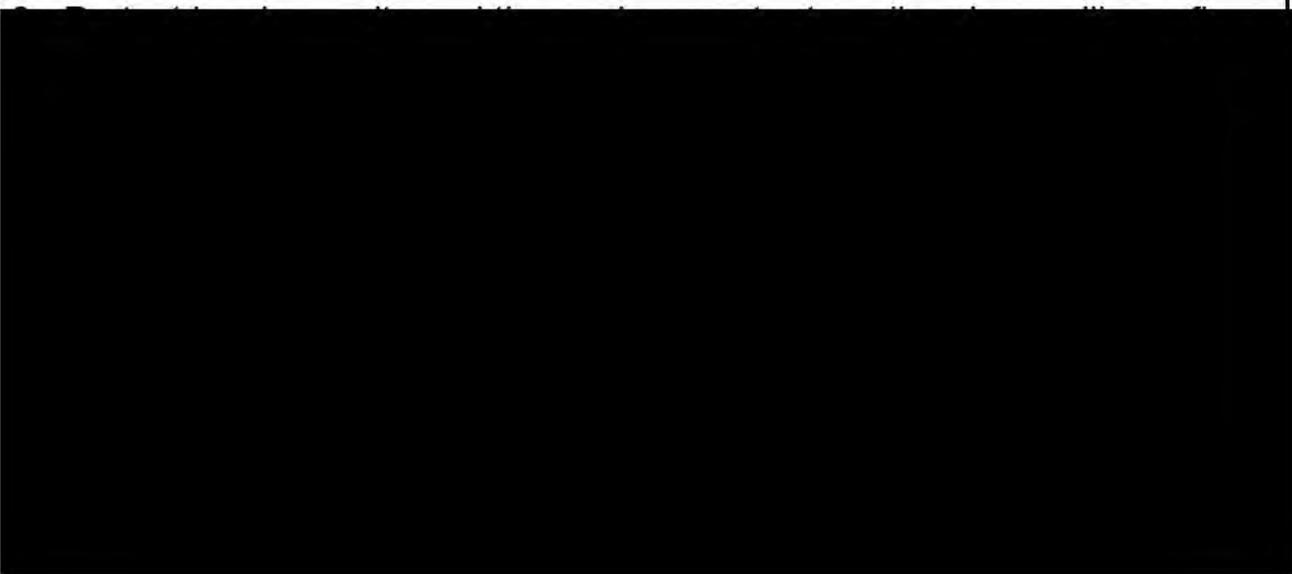
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Edward Davies

(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:		Date:	24.06.25
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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 181

From: [REDACTED]
To: [REDACTED]
Subject: Re: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 13:40:15

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 PI

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

My name is Carolyn kohen from [REDACTED]

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.

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Responder 183

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Fw: SITE ALLOCATION C27- Land East of Constable House, Adelaide Road (Gypsy And Traveller Site) of Draft Local Plan WE OBJECT VERY STRONGLY TO THIS LOCAL PLAN
Date: 24 June 2025 13:45:49

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.

Dear Sir/Madam,

Herewith forwarding our very strong opposition to the above proposed plan. We request you to please reconsider and avoid using this site.

Many thanks ,

Kind regards,

Drs.Francis Rajan and Shanti Rajan
[REDACTED]

----- Forwarded message -----

Sent: Monday, 23 June 2025 at 18:52:04 BST
Subject: SITE ALLOCATION C27- Land East of Constable House, Adelaide Road (Gypsy And Traveller Site) of Draft Local Plan WE OBJECT VERY STRONGLY TO THIS LOCAL PLAN

Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

To: Camden Council Planning Policy Team

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

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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).

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- Camden Local Plan Policy A2(e);
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This undermines the principle of mutual privacy and residential amenity and is in direct conflict with:

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

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- 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.

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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.

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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.

Thanking you,
Yours sincerely,
Dr. Francis Rajan



Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

To: Camden Council Planning Policy Team

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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:

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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.

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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);
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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.

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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.

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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.

Thanking you,
Yours sincerely,
DR (Mrs) Shanti Rajan



Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

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:

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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.

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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

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Thanking You,
Yours Sincerely,
Drs. Philip and Arti Taylor

From: [REDACTED]
To: [REDACTED]
Subject: FW: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 13:51:42

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To: Camden Council Planning Policy Team

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

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Kind regards

Andreas Georgiou

Christiana Demetriou



Responder 185

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 13:55:33

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Dear Sirs

To: Camden Council Planning Policy Team

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

I am a leaseholder at [REDACTED]

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).

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Yours faithfully

Georgios Macheras

Responder 186

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Objection to Site C27 – Land East of Constable House, Adelaide Road - Gypsy & Traveller Site - Proposed Submission Draft Regulation 19, 2025
Date: 24 June 2025 13:57:27

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Sharone Katz

[REDACTED]
[REDACTED]
24/06/2025

Dear Camden Council Planning Policy Team,

I'm writing to share my strong objection to the proposed designation of Site C27 – Land East of Constable House as a Gypsy and Traveller site, as outlined in the draft Camden Local Plan.

My husband [REDACTED] for over twenty five years. I joined him here 2.5 years ago upon our marriage. We absolutely support Camden's responsibility to provide accommodation for Gypsy and Traveller families—but this particular site is not a fair or suitable place for anyone to live.

First, the site is in a very exposed and high-traffic area. It sits right next to Chalk Farm station and along the busy walking route to Primrose Hill—one of the busiest pedestrian corridors in the borough. It's not a quiet or private place, and certainly not one where families could enjoy peace, security, or a real sense of home. Directly adjacent to the site are scooter, bike and Zipcar bays. People come and go day and night. It also backs onto the Constable House children's playground, which is a lively and well-used space for local families.

There is also the issue of access and safety. The surrounding area is already under pressure from congestion and parking demand. The plot is hemmed in by narrow roads and pedestrian areas, with limited turning space—posing challenges for critical emergency service vehicles.

I also want to highlight something more personal to our local community: over the past few months, local young people helped plant fruit trees and wildflowers on this plot and around Constable House as part of the CommuniTrees project. It's become a small but meaningful symbol of what local collaboration can achieve. If this site is developed, the entire project would be wiped out—and that feels like a big step backwards for community life and environmental care. While small, this is one of the last small green areas in our immediate neighborhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.

This proposal has moved forward with little to no consultation with local residents. The

allocation of Site C27 was not disclosed during earlier consultation rounds and our community only found out about the shortlist on June 22, 2025 undermining effective participation. This lack of transparency and failure to consult affected residents earlier in the process weakens the legitimacy of the allocation and suggests procedural unfairness.

Finally, I'd like to specifically note that site C27 fails multiple policy tests according to Camden's Local Plan, the London Plan, and the Government's Planning Policy for Traveller Sites (PPTS):

- Camden Policy H10, PPTS Policy H - Environmental Suitability
- Camden Policy H10 - Safe access
- Camden Policy H10 – Loss/protection of open and community space
- Camden Policy H10, PPTS Policy H - Incompatibility with surrounding uses
- PPTS Policy B & H, London Plan H14 - Lack of privacy and tranquillity

I urge the Council to rethink this site allocation. Site C27 is too small, too exposed, too noisy, and too important to the local community in its current use. There are better, safer, and more respectful options to be considered. I urge Camden Council to work to identify more suitable alternatives that prioritise safety, dignity, and real community integration

Thank you for taking the time to hear my concerns.

Sharone Katz

Date: Tue, 24 Jun 2025 13:03:31 +0000
From: [redacted]
To: PlanningPolicy
Subject: Regis Road redevelopment

I am writing to give feedback on the draft local plan currently out for consultation concerning the redevelopment of the Regis Road site in Kentish Town. In general, the plans seem to have many positive elements. However, the latest version released in March suggests placing the recycling centre next to residential properties on Holmes Road and opposite St Patrick's School on part of the current police station site. This new aspect was not subject to public consultation in the same way as earlier iterations. Nearby residents, including us, were unaware of this change until a few days ago.

Having studied the draft planning document, I would strongly suggest that it would be more suitable to place the recycling centre away from residential homes in the light industrial/commercial area shown on the plans or further north towards the Murphy's site/railway.

Residents of Holmes Road and the north end of Raglan Street are surrounded by piecemeal, ugly, ill considered developments the latest being the forthcoming 'hotel' above McDonalds which was recently granted planning permission in the face of many objections.

Residents already suffer a great deal of antisocial behaviour and noise, including from the Stay Club on Holmes Road. Placing the recycling centre here will add to noise, air pollution and disruption, creating a substantial further negative effect on the amenity of residents and on the school community. Many visitors to the current recycling centre leave their cars idling, so there could also be a potential effect on air quality for school children despite attempts to limit traffic fumes with Healthy School Street zones and traffic restrictions in Holmes Road.

A further concern is that the police station could be reduced to an administration centre if it loses some of its site.

If the council is serious about developing Holmes Road and the area towards the high street as an attractive neighbourhood, then moving the recycling centre next to residential homes here is not the way to go about it.

There is a real opportunity to improve the Holmes Road area for people living, working and passing through the area. I hope that Camden will reconsider this aspect of the plan.

Kindly confirm that you have received this response and that it will be considered as part of the consultation process.

Kind regards

Kate Barker and Phillip Joe
[redacted address]
[redacted postcode]

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 14:04:35

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were excluded due to existing use, access, or amenity conflict – all of which apply equally (or more severely) to Site C27.

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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,

Jonny Novick



From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 14:18:33

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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).

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Regards,

Filipa Ramos

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 14:19:21

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PERSONAL DETAILS

Name: Jakob Ben Zaken

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 community school Primrose Hill lost the outstanding last two years ago the teachers working so hard to get back outstanding rate again, in this situation I can see any opportunities to send my kids to stat school.

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.

Kind regards,
Jakob Ben Zaken

Responder 191

From: [REDACTED]
To: [REDACTED]
Subject: FW: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 14:20:51

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Dear Sir/Madam,

Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

To: Camden Council Planning Policy Team

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

I am writing as leaseholder at the Etons [REDACTED] [REDACTED] to object very strongly 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). Our building is located very close to the proposed site. 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).

If the proposed allocation goes ahead, it is extremely likely that it will be challenged before the courts.

My reasons for objection are the following.

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);

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

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I therefore respectfully request that:

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- The Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Takis Tridimas



From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 14:27:41

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: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

To: Camden Council Planning Policy Team

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

I submit this representation as Resident of Eton Place Eton College Road and on behalf and as part 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).

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Yours sincerely

Paola Cecarelli

Responder 193

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 14:53:20

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Sensitivity: Confidential

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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.

Stefanos Spanos

For :

Mobile:

Email:

Responder 194

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 15:01:02

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.

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.

Date: Tue, 24 Jun 2025 14:02:10 +0000
From: Jo
To: PlanningPolicy
Subject: Draft local plan

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SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

FAO: Camden Council Planning Policy Team

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

My name is Jo Richmond and I live at [redacted address] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections: Chapter 4 Central Camden: Table 5 Chapter 7: Meeting Housing Needs: Policy H11 Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,
Jo Richmond

Responder 196

Date: Tue, 24 Jun 2025 14:08:43 +0000

From:

To: PlanningPolicy

Subject: Objection to allowing Gypsy and Traveller accommodation next to
Constable House, Adelaide Road, Camden

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="Robert"/>	<input type="text"/>
Last Name	<input type="text" value="Starr"/>	<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	<input type="text" value="4.5"/>	Policy	<input type="text" value="H11"/>	Policies Map	<input type="text"/>
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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 type="checkbox"/>	No	<input checked="" 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 checked="" 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 type="checkbox"/>
(4) Consistent with national policy	<input checked="" 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.

<p>I 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).</p> <p>I 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</p>
--

consistency with national policy as set out in NPPF paragraph 35.

1. Loss of Functional Amenity Space Used by Residents

Though not formally designated as open space or a play area, this site is regularly and actively used by local residents and children as play and communal space. The site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports recreational and social use (notably for residents living in the adjacent and nearby high-density accommodation). Its redevelopment as proposed, for Gypsy and Traveller accommodation, would reduce the quality and variety of local amenity provision.

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, violating Camden's own Planning Guidance on Amenity.

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.

4. Access and Deliverability - Physical and Functional Constraints

There is no independent vehicular access. Estate roads cannot accommodate trailers, service, or emergency vehicles. Thus, the site lacks both required access and deliverability.

5. Health, Safety and Quiet Enjoyment of Residential Life

A gypsy/travellers site in this location poses a serious risk to health, safety and quiet enjoyment of residential life. There is particular concern for the safety of young children. Note that there are three churches and a nursery school and two secondary schools nearby.

6. Lack of Local Infrastructure Support

Police and other local infrastructure are already overwhelmed as evidenced by recurring problems in nearby Primrose Hill. They could not cope with the additional problems of a gypsy/travellers site in this location. Conclusion and Recommendation

7. Local Amenity and the Environment

Gypsy/travellers accommodation in this location would effectively lead to overflow of the site and pervade the local roads and neighbourhoods, with high risk of loss of local amenity and serious damage to the environment.

The proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk;

- Lack of access and deliverability.
- Harm to health, safety and quiet enjoyment of residential life
- Lack of local infrastructure support
- Loss of local amenity and harm to the environment

I urge LB Camden to remove this site from the Local Plan and seek a more appropriate, sustainable, and inclusive solution in consultation with all affected communities.

Yours faithfully,

Robert Starr

[Redacted signature block]

(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.

For the reasons noted above, the proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;
- Unacceptable flood risk;
- Lack of access and deliverability.
- Harm to health, safety and quiet enjoyment of residential life
- Lack of local infrastructure support
- Loss of local amenity and harm to the environment

I urge LB Camden to remove this site from the Local Plan and seek a more appropriate, sustainable, and inclusive solution in consultation with all affected communities.

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:	Robert Starr	Date:	24 June 2025
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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 197

From: [Michael Gladstone](#)
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 15:16:07

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.

Name: Michael Gladstone

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

Michael Gladstone

From: [REDACTED]
To: [REDACTED]
Subject: SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Date: 24 June 2025 15:20:07

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.

My name is Hayley Porter and [REDACTED]

I'd want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Hayley Porter

Date: Tue, 24 Jun 2025 14:25:15 +0000
From: Rachel Carter
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy and Traveller Site)

SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

FAO: Camden Council Planning Policy Team

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

My name is Rachel Carter and I live at [redacted address], London [redacted postcode] located approximately 100 metres opposite the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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:

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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:

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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.

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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

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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).

8. The proposed site has many mature holly and lime trees plus several newly planted young trees organised with the help of young local people by the charity KOKO Foundation Commune trees. No mature or newly planted trees should be put at risk as these are vital for environmental health, helping reduce the effects of pollution caused by the heavily used adjacent Adelaide Road.

9. There are no nearby playgrounds for existing local children or exercise equipment for adults living in the many residential flats in and adjacent to Constable House. This is a high density population area already

due to increase with the new flats currently being constructed between Chalk Farm underground station and the proposed site. The hard standing kick about area appears to be kept locked. A suggested better use of any land in the vicinity of Constable House would be to provide accessible exercise facilities for children and adults already resident in the immediate area.

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. It clearly fails the key tests of justification,

effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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Chapter 7: Meeting Housing Needs: Policy H11
Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community informed process.

Kind regards,



Responder 200

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road Draft Local Plan.
Date: 24 June 2025 15:31:01

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**G.Berman and Mrs
R.A.Wells**

24 June 2025

To: Camden Council Planning Policy Team

Re: Draft Local Plan. Site Allocation C27 – Land East of Constable House, Adelaide Rd (Gypsy and Traveller Site).

We acknowledge that a location should be provided, however the site proposed is manifestly unsuitable.

Additionally, the proposed site would deprive the residents of Constable House of their much-needed amenity space.

Access to the proposed site is adjacent to the busy Adelaide Rd, a bus route and arterial highway for emergency vehicles and heavy loaders. Vehicles often back up at the bus-stop outside Chalk Farm station. Access from the other direction is along Eton College Rd which is usually fully parked both sides; vehicles meeting cannot pass until one backs into to whatever space they find.

Road conditions in Eton College Rd will worsen due to additional usage during the construction and subsequent occupation of the large block of flats directly opposite the access to the Proposed Site.

Camden Planners have received detailed technical and legal arguments opposing the Draft Plan.

We trust that Camden will reconsider the proposed Draft Plan.

G.B

|

Date: Tue, 24 Jun 2025 14:51:01 +0000
From: Charlotte Stone
To: PlanningPolicy
Subject: Objection to planning for development of Gypsy and Traveller Site – Land East of Constable House, [redacted postcode] (ID 1016)

I am the owner of [redacted address], [redacted postcode]. I am 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 ID 1016 / Title Number NGL454800.

This site lies within a 10 minute walk of my home, and I am seriously concerned about the suitability of this location for such a development based on both practical and community related grounds. I would 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 I understand the need for inclusive accommodation provision, I strongly believe this location is unsuitable for such a development based on its environmental, social, and infrastructural limitations. I 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

Charlotte Stone (She/Her)


[\[redacted email\]](#)

Responder 202

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 15:51:54

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[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: Camden Council Planning Policy Team

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

I am adding my small voice, in great distress, to oppose this proposal: a bad idea both for our existing community, removing a tiny sliver of space, and bad for those who would be confined to this newly created spot of bad air, heat and extreme urban density.

Respectfully,

Anka Zaremba

[REDACTED]

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);
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- 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.

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-

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

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-

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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.

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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.

Date: Tue, 24 Jun 2025 14:53:07 +0000
From: Richard Lawrence
To: PlanningPolicy
Subject: Camden Local Plan: objections to site C27 - Land East of Constable House, Adelaide Road (Gypsy & traveller Site)

Dear Team,

My name is Richard Lawrence and I live in [redacted address] located near the aforementioned proposed site. Please accept this communication as a formal objection to site C27 as outlined below.

My Personal Details

Richard Lawrence



OUTLINE OF OBJECTION/REPRESENTATION

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

REASONS

This is a very small space which already has great value to those living nearby, not just visually, but socially and practically. These are the key concerns that make this location unsuitable for such allocation.

1) Loss of privacy for residents/future occupants:

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:

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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 & 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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11 Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

I also request that I wish to participate at the examination hearings into the Draft Local Plan before the inspector.

Kind regards and thank you for your time and consideration

Richard Lawrence

Responder 204

Date: Tue, 24 Jun 2025 15:58:25 +0000
From: Robert Kenny
To: PlanningPolicy
Subject: Representation Form - C27 Land adjacent to Constable House, Adelaide Road

[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.

With Regards,

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="Robert"/>	<input type="text"/>
Last Name	<input type="text" value="Kenny"/>	<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: Robert Kenny

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 H11 Policies Map C27 Land adjacent to Constable House, Adelaide Road

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

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

Objection to Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)

Legal Compliance Objection

I wish to formally object to the inclusion of the proposed Traveller site allocation at **Land east of Constable House, NW3 3QA** within Camden Council's Proposed Submission Draft Local Plan, on the grounds of **legal non-compliance** with the council's **Statement of Community Involvement (SCI)**.

Specifically, the consultation relating to this proposed site **failed to meet the legal standards and principles of proper community engagement** as defined in the SCI:

- **No in-person or drop-in events** were held for residents of Constable House or the surrounding area, despite the significant and direct impact of this proposal on their homes and local environment.
- **No physical notifications** (such as letters, flyers, or posters) were delivered to residents to inform them that the site next to their homes was being considered for Traveller accommodation. Many residents were completely unaware of the proposal until informed by neighbours.
- **No information was made available in languages other than English**, even though many residents of Constable House do not speak English or do not have it as their first language. This has **excluded vulnerable and under-represented groups** from meaningful participation and violates Camden's own inclusivity commitments.

These failures represent a breach of the Council's legal duty to consult in a way that is "**visible, accessible, inclusive, and transparent**" under both its SCI and national planning regulations (Town and Country Planning (Local Planning) (England) Regulations 2012).

As a result, this part of the Plan has **not been lawfully prepared**, and I respectfully request that the site allocation be **withdrawn or suspended** until proper, targeted, accessible consultation has been undertaken with the affected community.

Unsoundness Objection

I wish to object to site allocation C27 on the basis that it is **unsound**.

The proposed allocation of Traveller pitches at Land east of Constable House on the basis that the Camden Local Plan is **not positively prepared**. The site cannot realistically accommodate the borough's identified need for Traveller accommodation. Its extremely limited size, constrained access, and location adjacent to dense residential housing make it unsuitable for even a small number of pitches. Strong public opposition is also likely to make delivery difficult, meaning this site does not offer a serious or feasible contribution to meeting Camden's stated target.

The plan is also **not justified**, as there is no clear or proportionate evidence supporting the selection of this site. Camden has not provided technical assessments or supporting information showing that the site is appropriate or viable. There appears to be no detailed analysis of its suitability in terms of flood risk, accessibility, or proximity to existing homes, and no transparent explanation for why this location was chosen over others.

Finally, the allocation is **not effective**, because the site is unlikely to be deliverable in practice. Its physical constraints—including small scale, awkward layout, and location on a green space with limited road access—pose serious barriers to development. Additionally, the lack of community support and the strength of public resistance will make achieving planning permission difficult, if not impossible. Without a clear path to implementation, this part of the Plan fails the test of effectiveness.

(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 site allocation at **Land east of Constable House (C27) (NW3 3QA)** should be **removed from the Plan**. The site is unsuitable due to its limited size, constrained access, and significant risk of undeliverability due to local opposition and practical limitations.

Camden should instead **reassess alternative sites** using a transparent, evidence-based process and publish the results for public scrutiny. Any future allocations should be supported by clear technical justification, realistic delivery plans, and genuine consultation with both the Traveller community and affected residents. This would ensure the Plan is positively prepared, justified, and effective, in line with national planning 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:

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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:	24-06-25
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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 205

Date: Tue, 24 Jun 2025 16:01:47 +0000

From: Barbara Abraham

To: PlanningPolicy

Subject: Representations on Camden Draft Local Plan: Trees & Green Spaces

Barbara Abraham

[redacted address],

[redacted]

[redacted]

Camden Draft Local Plan 2025: Comments on Trees & Green Spaces

The 2025 draft Camden Local Plan rightly places emphasis on the *role that trees, plants and greenery can play in keeping our air clean, reducing surface water flooding, cooling our neighbourhoods, enhancing biodiversity and helping to tackle the climate and ecological emergency.*

Unfortunately, the draft Plan includes insufficient practical measures to meet the NPPF requirement that existing trees are retained wherever possible. Measures are needed particularly to protect the vast number of trees in Camden that are not eligible for TPO status. Of exceptional importance are the green corridors in the back gardens of residential streets and a method of protecting these needs to be adopted urgently. These shortcomings could be addressed by Camden adopting a “non-standard” method of valuing trees more appropriate to an urban setting than that currently used. Similarly, the draft Plan acknowledges the importance of gardens as green spaces in densely populated areas but does not incorporate sufficient measures to preserve and protect them.

TPO and other trees

It is encouraging to see that the draft Plan acknowledges many of the benefits of trees: *Tree planting is recognised as an important way of reducing carbon emissions through carbon storage. Furthermore, trees provide habitats for wildlife and are important for their visual amenity. Woodland and individual trees can help to provide shade, aid water attenuation, help to preserve soils and increase biodiversity. They can act as stepping-stones for wildlife throughout the landscape and provide important wildlife corridors within the urban environment. Trees can also make places more attractive and cohesive, encourage increased use of walking and cycling routes and contribute to greater health and well-being.*

The draft Plan emphasises *trees and vegetation of significant amenity, historic, cultural or ecological value*, i.e. trees with, or potentially worthy of, TPO protection. Camden does need to be more rigorous in ensuring that, in the rare circumstances where TPO-protected trees need to be felled, replacement planting of trees of equivalent value takes place or, if that is not possible, that a financial contribution is obtained to finance replanting by Camden Council in a nearby location. However, trees subject to or worthy of TPOs already have reasonable legal protection. In contrast, little protection is afforded to the huge numbers of trees in Camden that do not have significant amenity value but nevertheless are vitally important to the character of their neighbourhoods and in providing wildlife habitat and biodiversity, offering shade and cooling, and filtering pollutants from the air. Trees in back gardens may have low amenity value but make a significant contribution to abatement of air and noise pollution and to wildlife habitats and biodiversity.

The National Planning Policy Framework *requires that existing trees are retained wherever possible*, but the draft Plan lacks measures that will achieve the retention of trees. Outside of Conservation Areas (CAs), the Council does not even need to be notified of works to trees, including felling. Camden needs to address this gap in its ability to control the felling of non-TPO trees on private land as a matter of urgency.

All tree works in CAs need to be notified to the Council in advance and approval sought, but generally Tree Officers will only object to the felling of a tree in a CA on the grounds that the tree satisfies the criteria for being granted a TPO. Trees in back gardens may have little ‘amenity value,’ according to standard arboricultural calculations, if they are not visible from the public domain

(regardless of their value to residents of surrounding buildings). Tree Officers repeatedly state that they are unable to attribute sufficient value to factors such as protection against air and noise pollution or to trees as wildlife habitat promoting biodiversity, to make a difference to the calculation of the tree's total amenity value. The draft Plan acknowledges the exceptional importance of green corridors of trees and vegetation in back gardens in providing *important wildlife corridors within the urban environment*, and the Plan should give specific protection to such green corridors. At present such green corridors are being steadily eroded from month to month by the felling of individual trees, with no weight attributed in the decision-making process to the cumulative effect of such fellings. If Camden does not include protection in the new Plan, many of today's remaining green corridors simply will not exist in five years' time.

Importance of gardens

The Plan acknowledges the importance of gardens - *Gardens help shape their local area, provide a setting for buildings, provide visual interest and often support natural habitats. Therefore, they can be an important element of the character and identity of an area (its 'sense of place') and its biodiversity.* We welcome the commitment to resist development that occupies a disproportionate amount of a garden, *notwithstanding permitted development rights*, but "disproportionate" should be defined and the policy should be consistently applied going forward.

A5 of Policy NE1 states that to conserve and enhance Camden's natural environment the Council will *protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible.* With the exception of the restriction in permitted development rights for disproportionate garden structures referred to above, the draft Plan puts forward no specific proposals or practical measures as to how gardens will be protected. Insufficient recognition is given to the importance of the back gardens of houses and blocks of flats; such gardens are often highly valued by the residents of flats which overlook the gardens, even if they do not have access to those gardens.

Increasing canopy cover in Camden

It was an objective of the 2017 Plan to plant 800 additional street trees: was this achieved? It is good that the draft Plan is focusing on total tree canopy cover across the borough, as it is tree canopy cover rather than numbers of trees planted that will have most environmental impact. However, the target increase of 3.7% over the 30 years from 2016 to 2035 seems unambitious. It would help readers of the Plan to understand the challenge involved if statistics were included around the percentage canopy coverage in 2016 and the increase or decrease over the decade to 2025.

Without more protection for existing trees that do not have TPOs, the depletion of canopy cover in neighbourhoods will continue, with mature trees being felled without good reason, and no obligation at all for replacement planting.

Camden's expectation that at least two new trees will be planted for every tree lost is welcome, but has limited applicability and is unlikely to result in a significant increase in canopy cover.

Trees/green space and developments

There will always be a conflict between development and the preservation of trees and green areas. It is pleasing that the draft Plan has ambitious plans to incorporate green infrastructure into future major developments at Murphy's Yard, Regis Road and West Kentish Town Estate. More generally the draft Plan needs to provide for an improved system of control and enforcement to ensure that developments fulfil planning stage commitments about trees and green spaces.

The retention of trees and green space during the course of developments needs to be improved by monitoring and enforcing commitments made about retaining existing trees and planting new ones. Subsequent applications to remove trees after development has commenced should be treated as stand-alone tree planning applications and dealt with on their individual merits by Tree Officers.

Date: Tue, 24 Jun 2025 16:16:34 +0000

From: Yuki Perry

To: PlanningPolicy

Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site)

I am writing to express my strong objection to the proposed allocation of Site C27 Land East of Constable House, [redacted postcode] for Gypsy and Traveller accommodation. As a tenant of [redacted] I am deeply concerned about the implications this proposal would have on our local community and neighbourhood environment.

I respectfully urge the Planning Inspector to recommend that Site C27 be removed from the Plan. Its inclusion, in my view, is fundamentally unsound and fails to meet the core tests of justification, effectiveness, and consistency set out in paragraph 35 of the National Planning Policy Framework (NPPF). Below are the key reasons for this objection:

1. Loss of amenity space

Residents from the surrounding estates – especially families and elderly individuals – rely on this open space for recreation, children's play, and social interaction. Its loss would disproportionately impact local residents, many of whom live in flats without private gardens. Removing this green buffer would exacerbate the shortage of accessible open spaces in the neighbourhood and contradict established planning policy, including:

- NPPF Paragraphs 99-101 – on safeguarding open space;
- London Plan Policy S4 – promoting play space and informal recreation;
- Camden Local Plan Policy A2(e) – maintaining local green infrastructure;
- Relevant legal precedent (e.g. *Copas v RBWM* [2001] EWHC 548) – requiring strong justification before repurposing informal communal land.

2. Flood risk

Camden's own flood risk assessments confirm that Site C27 lies within a Local Flood Risk Zone and is vulnerable to surface water accumulation. This is especially concerning given that Traveller accommodation is classified as a "Highly Vulnerable Use" under national Planning Practice Guidance.

The allocation fails the Sequential and Exception Tests and contradicts the following planning policy:

- NPPF Paragraph 167 – flood resilience and location suitability;
- PPTS Paragraph 13(g) – avoiding high flood risk zones;
- APP/B5480/A/11/2151483 (Romford) – refusal of Traveller sites in similar conditions.

3. Inadequate access

Access to the site is constrained by narrow estate roads and pedestrian routes not designed for vehicular use, especially the types of vehicles associated with Traveller accommodation. Emergency access, waste removal, and day-to-day movement would be unfeasible without major infrastructure works.

This fails to meet:

- Manual for Streets (DfT, 2007) – access standards for safety and service;
- PPTS Paragraph 13(b) – deliverable and accessible sites;
- Equality Act [redacted address] vulnerable groups at a disadvantage.

3. Lack of transparency

There has been a clear breakdown in communication and transparency in the site selection process. Specifically:

- No public explanation has been provided as to why Site C27 was selected over others;

- No prior consultation was conducted with nearby residents, despite their direct proximity;
- The allocation only became known to most of us through the May 2025 Regulation 19 Draft, effectively denying early participation.

This undermines NPPF Paragraph 16(d), which requires local plans to be justified, explainable, and created through genuine public engagement.

In summary, Site C27 is fundamentally unsuitable for Traveller accommodation and its inclusion in the Local Plan is unsound. Its allocation:

- Eliminates valued community green space;
- Introduces privacy, flood, and access risks;
- Lacks evidential support and transparency.

For these reasons, I respectfully request that Site C27 be removed from the Camden Local Plan. I further urge the Council and Inspector to revisit the site selection process, prioritising transparency, evidence-based decision-making, and early community involvement in identifying more appropriate alternative.

Thank you for your attention to this matter.

Sincerely,
Yuki Perry



Responder 207

Date: Tue, 24 Jun 2025 16:30:09 +0000
From: diana milner
To: PlanningPolicy
Subject: OBJECTION to Proposed Gypsy and Traveller Site next to Constable House on Eton College Road

I would like to strongly object to this preposterous idea:

- the space is too small and with heavy traffic UNSUITABLE FOR THE PURPOSE
- what about the residents of Constable House, are they happy with the idea?
- a new MUCH NEEDED green area has been created there by a volunteer group (wildflower meadow, new trees) in a desperate attempt to make up for all the trees that were killed and removed to build the HS2
- **Unsafe, overcrowded, unecological, unsanitary, unsocial**

STOP THIS PREPOSTEROUS PROJECT PLEASE

Kind regards

Diana Milner

Responder 208

Date: Tue, 24 Jun 2025 16:30:28 +0000

From: sonia c

To: PlanningPolicy

Subject: OBJECTION to Proposed Gypsy and Traveller Site next to Constable House on Eton College Road

I would like to strongly object to this preposterous idea:

- the space is too small and with heavy traffic UNSUITABLE FOR THE PURPOSE
- what about the residents of Constable House, are they happy with the idea?
- a new MUCH NEEDED green area has been created there by a volunteer group (wildflower meadow, new trees) in a desperate attempt to make up for all the trees that were killed and removed to build the HS2
- **Unsafe, overcrowded, unecological, unsanitary, unsocial**

STOP THIS PREPOSTEROUS PROJECT PLEASE

Kind regards

Sonia Corral

Responder 209

Date: Tue, 24 Jun 2025 17:06:41 +0000
From: Lauren Doffman
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)
Subject: Objection to planning permission of the gypsy and traveller site.

FAO: Camden Council Planning Policy Team

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

My name is Lauren Doffman [redacted address] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,
Lauren

Sent from a mobile [REDACTED]
[REDACTED]

Date: Tue, 24 Jun 2025 17:11:05 +0000

From: Stephen-Andrew Whyte

To: PlanningPolicy, [redacted]
[redacted]

Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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

My name is Stephen Andrew Whyte and I live in [redacted] [redacted address], [redacted postcode] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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

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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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Stephen-Andrew Whyte

Date: Tue, 24 Jun 2025 17:11:30 +0000
From: jacky musseau
To: Rebecca Filer (Cllr), PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr),
Rebecca Filer (Cllr)
Subject: SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And
Traveller Site)

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requests to take action or for you to verify your password etc.

SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy
And Traveller Site)

FAO: Camden Council Planning Policy Team

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

My name is Jacky Musseau and I live in [redacted address] [redacted]
[redacted postcode] London, located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend
removal of Site C27 from the Plan on the grounds that its
allocation is unsound for the following reasons:

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:

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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:

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3. Flood Risk - Unsuitable for Highly Vulnerable Use

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- Precedent: APP/B5480/A/11/2151483 (Romford) - Traveller sites refused on similar flood vulnerability grounds.

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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.

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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.

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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

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and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Jacky and Svetlana Musseau



Responder 212

Date: Tue, 24 Jun 2025 17:14:59 +0000
From: PUERTAS, Renata [redacted]
To: Kemi Atolagbe (Cllr), Nasrine Djemal (Cllr), Rebecca Flier (Cllr), Planning Policy
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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Dear Camden Council Planning Policy Team

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

My name is Miss Renata Puertas and I live in [redacted] [redacted address] [redacted] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

1. Loss of Valued Community Amenity Space

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- Justification (why this site over others);
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Conclusion and Requested Action

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and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Renata Puertas

This message may contain confidential information. If you are not the intended recipient please:
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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

Frances Parsons

From: [REDACTED]
To: [REDACTED]
Subject: Concerns Regarding Site 1016 – Land East of Constable House (NW3 3QA)
Date: 24 June 2025 18:44:24

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[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 a local resident living near Site 1016 (Land east of Constable House, NW3 3QA), and I am writing to express my concerns regarding the proposed development as part of the Gypsy and Traveller Site Identification Study.

1. ****Loss of green space and environmental impact****

This site currently serves as a valued green area for the community. Developing it would result in the loss of an important local amenity, reduce biodiversity, and alter the character of the neighbourhood. (include potential for flooding on Adelaide Road, on Flood Street)

2. ****Potential for increased disruption****

The introduction of caravan pitches could lead to increased traffic, noise, and parking pressures in an already densely populated residential area. Without a clear and enforceable management plan, this poses serious concerns.

3. ****Encouraging Open Dialogue with Residents****

It is vital that residents are genuinely consulted and involved in shaping any proposals. Similar projects elsewhere have led to significant tension when local communities were not properly informed or engaged.

4. ****Request for full transparency****

I would appreciate further information on:

- The number of pitches proposed and their intended layout.
- Details of services and infrastructure (water, waste, electricity, sanitation).
- Any proposed site management strategy and who would be responsible for maintenance and supervision.
- The environmental impact assessment, if available.
- A clear project timeline.

While I understand the Council's legal and moral obligation to provide sites for the Traveller community, I believe alternative locations, particularly those previously developed or with less residential impact on the green space, or a non-used parking rear, should be explored.

I would also like to be kept informed about upcoming public meetings or consultation events.

Thank you for your attention, and I look forward to hearing back from you.

Yours sincerely,
Sophie Beck

Responder 215

From: [REDACTED]
To: [REDACTED]
Subject: Fw: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 24 June 2025 19:08:25

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For your kind attention.

[REDACTED]

Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan

Dear Sirs,

We are writing to you regarding the above subject matter.

We reside at [REDACTED] the building block opposite to the proposed site. As you may be aware the proposed location for the Gypsy and traveller site is the only open space available in an already densely populated residential area around the Chalk Farm Station, not to mention that the open space itself is very small ie we only have a very small open space in the area.

It seems unbelievable that the Camden Council actually proposed to put up the Gypsy site here.

We kindly request that this plan be cancelled.

Thanks & best regards,
Michael De Souza and Elmia Da Silva
[REDACTED]



Virus-free [REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)
Date: 24 June 2025 19:18:35

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FAO: Camden Council Planning Policy Team

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

My name is Shahrukh Jumani and I am the owner of [REDACTED] located in proximity to the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

1. Loss of Valued Community Amenity Space

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- * 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;
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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:

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- * 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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Shahrukh Jumani

Date: Tue, 24 Jun 2025 18:21:40 +0000
From: Katrin Nuernberger
To: PlanningPolicy
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

I am writing to you to object to the proposed gypsy and traveller accommodation on the land adjacent to Constable house, Adelaide Road.

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

Why I am objecting to the proposed plans:

- 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 and is used as a play area for the residents of Constable House. If the site was developed, this facility would be lost without any substitute.
- The site is overlooked on all sides. Privacy of residents will be lost.
- 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.

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.

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

Regards

Katrin Nuernberger

[redacted address], 

[redacted postcode]

Sent from my iPhone

Responder 218

Date: Tue, 24 Jun 2025 18:37:21 +0000
From: Victoria Woodhouse
To: PlanningPolicy
Subject: Objections to site C27

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<https://aka.ms/LearnAboutSenderIdentification>]

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Hi,

As a resident of [REDACTED] I wish to express my objections to the site allocation C27 traveller/gypsy site

C27 should be removed from

Chapter 4 central Camden table 5
Chapter 7

Draft policies map schedule of proposed local site allocations

This small space is utilised by the local community who live in a densely populated area of London and wildlife.

The numerous families who live adjacent to the space have a right for privacy and to enjoy the space as it is currently. This should not be removed and it is not a good fit for Camden's proposals.

There has been no meaningful consultation for us as residents to feed this back and have our concerns heard. Particularly given the recent sexual assault on Primrose Hill it is a delicate time and residents and employers in the area deserve to have their concerns listened to.

Victoria Woodhouse
[redacted address], [redacted postcode]

From: [REDACTED]
To: [REDACTED]
Subject: Re: Site Allocation C27 - Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 19:46:53

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[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 Inspector,

I'm a freeholder and resident at [REDACTED] – very close to the proposed Site C27 (Land East of Constable House) – and I'm writing to object to its inclusion in the Camden Local Plan as a designated Gypsy and Traveller site.

I believe this is an unsuitable location for several important reasons, and I'd like to ask that Site C27 be removed from the draft plan. It simply doesn't meet national planning tests for justification, deliverability, or consistency with established policies.

1. This Green Space Is Vital to the Community

Although it's not formally designated as open space, this site is a long-established community green area. It's been used for decades by local families and older residents as a play area, informal park, and gathering space—particularly important for those living in the surrounding flats with no gardens.

The loss of this space would be a serious blow to the community, going against policies in the NPPF (paragraphs 99–101), the London Plan (Policy S4), and Camden's own Policy A2. It's also part of the "Communi-trees" greening initiative. Simply put, this is the wrong kind of site to repurpose.

2. Vehicle Access Is Extremely Limited

There's no proper vehicle access to this land – only narrow estate roads and walkways. It would be very difficult, if not impossible, for large vehicles, trailers, or emergency services to reach it safely.

This puts it in conflict with planning guidance that requires safe, usable access for any proposed site. If it can't be safely accessed, it can't be delivered.

3. Overlooking Is a Big Issue

The site is surrounded by tall buildings – including Constable House and others nearby like Eton Hall and Eton Rise – which heavily overlook the area. This makes privacy a major concern, both for current residents and for anyone who might occupy the site in the future.

National policy and legal precedent (like *Moore v SSCLG*) make clear that mutual privacy and amenity should be respected in planning decisions, and this location fails that test.

4. The Site Is in a Known Flood Risk Zone

Camden's own flood risk mapping shows that this location is subject to surface water flooding. And because Traveller accommodation is classified as "Highly Vulnerable" in planning terms, this is not an appropriate or safe site.

The allocation would go against national flood risk guidance, including NPPF paragraph 167 and the Planning Policy for Traveller Sites (paragraph 13g).

5. The Selection Process Was Not Transparent

The way this site was chosen raises serious questions. Initially, 21 sites were identified in the AECOM study. Then, without clear explanation, only two moved forward – including this one. There's no detailed reasoning about why C27 made the cut or why others were rejected.

Even more frustrating is that this site didn't appear in earlier consultation rounds. Residents like me only found out about it in the May 2025 draft, which limited our ability to engage earlier and undermines the consultation process.

6. It Fails the Council's Own Selection Criteria

AECOM's site assessment used a clear set of filters: exclude sites that are within 18m of tall buildings, used as play/amenity space, in flood zones, or lacking proper access. Site C27 fails *all four* of those tests.

It's hard to understand how it passed the initial filter, and including it anyway undermines confidence in the whole process.

7. Other, More Suitable Sites Were Rejected

There's also no proper explanation for why 19 of the 21 original sites were ruled out while this one advanced – especially when many of the concerns used to reject others apply just as much (or more) to C27.

Without a proper scoring or comparative process, this doesn't meet the planning requirement to be justified or consistent.

To Summarise

Site C27 is an inappropriate and undeliverable location for Traveller accommodation. It would result in the loss of well-used community green space, presents serious access, flood, and privacy concerns, and was selected through an unclear and inconsistent process.

I'm asking that the Inspector remove Site C27 from the Camden Local Plan and that a more transparent review of alternative sites be carried out.

Kind regards,
Catriona Black
Resident and Freeholder, [REDACTED]

Responder 220

From: [REDACTED]
To: [REDACTED]
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 20:01:00

Sie erhalten nicht häufig E-Mails von [REDACTED] [Erfahren Sie, warum dies wichtig ist](#)

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Charlotte Vohryzek-Samuel



Tel.: [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
- **Playground:** the area was constructed as a play area for the residents of Constable House, and is used as a play and sports space. It has historically been identified on OS Maps as a playground and now serves as a play and sports 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. Surely it is key to keep leisure space - particularly for Camden Youth!?
- **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 etc.**
- The local area is already overrun with drug users, overt drug deals and drug taking in broad daylight are a daily occurrence and children and youngsters are already scared walking to/from school or to Chalk Farm tube station on their own. It seems Camden Council has no control whatsoever - is this really going to help!? NO definitely not. On the contrary, it would completely overload an area that is already stretched to its limits. We already have shouting and fighting in the middle of the nights with no police around doing anything, homeless people in tents in front of the tube station and the local St Saviour's church, etc.
- The area in question should be transformed into a proper, good playground or outdoor sports/workout space for Camden children/youth instead. Much more needed and far more likely to help against crime, homelessness, drug taking and dealing and all other issues in the immediate proximity, and also Camden's duty.

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. There is a complete lack of clarity as to the proposed area. None of the documents on the council's website show the area properly (apparently it is now not including the tree space!?). This shows a complete failure to consult.

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.

***Cordially
Charlotte Samuel***

Date: Tue, 24 Jun 2025 19:24:39 +0000
From: Sanjiv Sharma
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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FAO: Camden Council Planning Policy Team

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

My name is Sanjiv Sharma and I live in [REDACTED] [redacted address], [redacted postcode] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Sanjiv Sharma

From: [REDACTED]
To: [REDACTED]
Subject: Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 20:27:45

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Mr & Mrs Vicas
[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.

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

Kind regards

Mr & Mrs Vicas

Responder 223

Date: Tue, 24 Jun 2025 19:29:48 +0000
From: Ken Wilson
To: PlanningPolicy
Subject: Traveller's Site - Constable House

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Dear Camden Planning,
It is hard to imagine a more unsuitable site for Gypsy and Travellers caravans and cars and trucks than the small subterranean, asphalted site at Constable House.

Being located several metres below ground level it will need extensive groundwork for access by ramp which will reduce the available space. The overflow of more caravans arriving on site will be achieved by breaking down the fences adjoining Adelaide Road and parking in front of people's flats in the wider block. The residents and owners are presumably not impressed with the prospect.

Travellers do need areas for flytipping and the rest of the grounds around the block will be suitably utilised which will also not be popular.

Please, for the benefit of Constable House, reconsider this proposal

Best regards
Ken Wilson
[redacted address], [redacted postcode]

Date: Tue, 24 Jun 2025 19:32:33 +0000
From: Sebastian Hjortland Marks
To: PlanningPolicy
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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FAO: Camden Council Planning Policy Team

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

My name is Sebastian Marks and I live in [REDACTED] located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,
Sebastian

Responder 225

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 20:33:29

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To: Camden Council Planning Policy Team

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

Good afternoon. My name is Wiktor Kowalczuk, I'm a resident of [REDACTED]
[REDACTED]

I submit this representation 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). I respectfully request that the Planning Inspector recommends removal of Site C27 from the abovementioned Plan, as well as Chapter 4 Central Camden: Table 5, Chapter 7: Meeting Housing Needs: Policy H11, and Draft Policies Map and Schedule of Proposed Local Plan Site Allocations, 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, it has historically been identified on OS Maps as a playground, and 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.

I 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.

I would also like to participate in the examination hearings

Best regards,
Wiktor Kowalczyk.

Responder 226

Date: Tue, 24 Jun 2025 19:36:22 +0000
From: Sharon Lilienthal
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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FAO: Camden Council Planning Policy Team

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

My name is Sharon Lilienthal and I live in [redacted address] nw3 located near the proposed site.

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Sharon
Sent from my iPhone

Responder 227

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.
Date: 24 June 2025 21:14:56

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[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 Policy Team and Councillors

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

I am writing to express my strong opposition to the proposal for the 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).

I have been recently made aware of the above mentioned proposal. I and other residents (including those of Constable House) around Site C27 have been dismayed by the **inadequacy of consultation. This lack of transparency is concerning of a council who states in their vision that they want to enable people living in Camden to contribute to their communities. It is my view that there should have been more effort from an inclusive council to make their residents aware of this proposal.**

Having reviewed the plans 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).

Below I highlight several significant concerns and reasons regarding this proposal based that I believe should be taking into consideration for the deletion of Site C27 plan:

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 has matured trees and wildflowers, and recently was enhanced by the planting of fruit trees and wildflower areas as part of the Communi-Trees project, involving local youth and the KOKO Foundation. This initiative promotes community engagement and biodiversity. The proposed development would necessitate the removal of these newly planted trees and a substantial number of mature holly trees (between 30 and 60), which would represent a significant loss to local biodiversity**

and community efforts. 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.

I believe this would be a great opportunity to instead of allocating it as a gypsy and traveller site to turn this into for example a children's play and outdoor gym area that will benefit the whole community. It also aligns with Camden's call to action to encourage interaction and engagement between neighbours, and people with different experiences and background.

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. **This condition conflicts with paragraph 13 of the Government's Traveller Sites Planning Policy, emphasizing the**

need for resilient and safe locations for accommodating any communities. 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);
- As mentioned above 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:

1. Within 18m of 4+ storey buildings (overlooking);
2. Used as amenity or play space;
3. At risk of surface flooding;
4. 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).

I therefore urge Camden Council to explore alternative locations that may be more suitable for Gypsy and Traveller accommodation. It is essential to consider sites that can cater to the needs of the community while minimizing the impact on existing residents.

In conclusion, while I understand the importance of providing adequate accommodation for Gypsy and Traveller communities, the proposed site adjacent to **Constable House is not suitable** and 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.

It is vital that Camden Council prioritizes the well-being of all residents and considers the long-term implications of this proposal. I therefore respectfully request that Site C27 is removed from the Camden Local Plan submission draft, and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Thank you for considering my views. I hope you will re-evaluate this proposal with the community's best interests at heart.

Kind Regards

Astrid Berkman

Responder 228

From: [REDACTED]
Subject: Draft Local Plan – Objection to Site Allocation C27 (Gypsy and Traveller Site)
Date: 24 June 2025 21:36:31

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

My name is Ounal Bailey and I live at [REDACTED] in the vicinity of the proposed site.

I am writing to formally object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound, based on the following reasons:

1. Loss of Valued Community Amenity Space

- The site functions as an informal but essential green space, used by residents for play, relaxation, and social interaction.
- Its removal would disproportionately affect vulnerable groups such as children and the elderly.
- Violates policies and legal precedent protecting community and green spaces:
 - NPPF Paragraphs 99–101
 - London Plan Policy S4
 - Camden Local Plan Policy A2(e)

- Copas v Royal Borough of Windsor and Maidenhead [2001]

2. Overlooking and Loss of Privacy

- The site is overlooked by multiple multi-storey buildings, creating a privacy and amenity issue for both existing and potential future residents.
- Contravenes:
 - Camden Planning Guidance (2021)
 - PPTS 2023 Paragraph 13(c)
 - Article 8, ECHR
 - Moore v SSCLG [2013]

3. Flood Risk – Unsuitable for Highly Vulnerable Use

- The site lies within a Local Flood Risk Zone and is at known risk from surface water flooding.
- Traveller accommodation is classified as “Highly Vulnerable Use” and not suitable in such areas.
- Contravenes:
 - NPPF Paragraph 167
 - PPTS Paragraph 13(g)
 - Romford appeal case (APP/B5480/A/11/2151483)

4. Access Constraints and Undeliverability

- Inaccessible by suitable vehicles and emergency services due to narrow estate roads and pedestrian paths.
- In breach of:
 - Manual for Streets (DfT, 2007)
 - PPTS Paragraph 13(b)
 - Equality Act 2010

5. Unsound Site Selection Process and Lack of Transparency

- Site C27 was not included in earlier public consultations.
- No clear explanation provided on why this site advanced while others were dismissed.
- Breaches transparency and consultation standards:
 - NPPF Paragraph 16(d)

I therefore urge the Council and Planning Inspectorate to remove Site C27 from the Local Plan submission draft and find more suitable locations via a transparent and community-informed process.

regards

Ounal

Sent from [Outlook for iOS](#)

Responder 229

Date: Tue, 24 Jun 2025 20:46:45 +0000

From: diego calderon

To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)

Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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

My name is Diego Calderon and I live in [redacted address].

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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 SCLG [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;
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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.

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- 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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Diego Calderon

Responder 230

Date: Tue, 24 Jun 2025 21:00:44 +0000

From: Kyra Balmforth

To: PlanningPolicy

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

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="Kyra"/>	<input type="text"/>
Last Name	<input type="text" value="Balmforth"/>	<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: Deletion of Site Allocation C27 from Draft Local Plan Modification proposed:

Delete Site Allocation C27 – Land East of Constable House, NW3 3QA – from the Local Plan Site Allocations (Policy H11 and related maps and tables).

□

REASONS FOR OBJECTION

Contradictions Within the Council's Own Site Assessment

The GTSIS Final Report (Nov 2024) explicitly acknowledges that the land east of Constable House — referred to as AECOM ID 1016 — is affected by flood risk, privacy issues due to proximity to adjacent residential blocks, and environmental constraints, including mature vegetation. Despite these clear concerns, the site was carried forward based solely on high-level desktop review, with no site visit or resident consultation. These constraints are serious and cannot be resolved through minor mitigation.

“Constraints include potential for flooding (Adelaide Road was identified in Flood Streets 2021 data) and potential lack of privacy [...] The latter is partially mitigated by vegetation on the site boundary.”

— GTSIS, Appendix B, p.33

In reality, vegetation is not an adequate solution to severe overlooking from multiple 4–6 storey residential buildings, including Constable House, Bridge House, and the Etons.

Loss of Protected and Valued Open Space

The site is functional green space and informal amenity land, used daily by families in Constable House and surrounding estates. It supports biodiversity and wellbeing and has been enhanced through community initiatives like the Communi-Trees project, where fruit trees and wildflowers were planted with local young people. Development would directly contradict the aims of Camden's Local Plan policies on open space, community greening, and access to nature.

Flood Risk Ignored in Practical Terms

The study flags the Adelaide Road site as a known flood area, appearing in Camden's "Flood Streets 2021" data, but does not exclude the site on this basis. This puts future residents — including potentially vulnerable families — at risk and undermines Camden's climate resilience ambitions. The Planning Policy for Traveller Sites (2023) states that high-risk flood zones are inappropriate for Traveller site development.

Access Constraints and Worsening Pollution

The site has no independent access and would require vehicles, services, and construction traffic to enter via residential areas. The GTSIS itself acknowledges “lack of privacy” and possible access challenges, but underplays the full impact on an already congested and polluted road network.

Camden residents along Adelaide Road are already suffering ongoing noise, dust, traffic, and access disruption due to the HS2 project. Adding further construction and eventual occupation traffic to this site is unacceptable and would increase health and wellbeing risks for the entire area — particularly families and older residents.

Lack of Transparency and Local Engagement

The GTSIS confirms that no community consultation or site visit was included in the selection process:

“No community engagement nor site visits were included in the scope of the study.”

— GTSIS, p.6

Many residents of Constable House, the Etons, and nearby buildings are still unaware of these proposals. This fails to meet the Council’s commitment to meaningful resident engagement and undermines confidence in the planning process.

Internal Policy Conflict

Allocating this site would contradict Camden’s own strategic objectives, including:

- Supporting access to green space and play areas
- Enhancing community-led greening initiatives
- Reducing exposure to air and noise pollution
- Mitigating flood risk
- Ensuring development does not reduce residential amenity

CONCLUSION

This space is not appropriate or safe for use as a Traveller site — or any new housing development — due to fundamental constraints identified in Camden’s own technical evidence base. It would cause the loss of vital community space, increase environmental risk, and exacerbate disruption already being endured due to HS2.

I strongly urge that Site C27 be deleted from the Local Plan.

(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:	
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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 231

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Site Allocation C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)
Date: 24 June 2025 22:10:58

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.

Dear Planning Policy Team,

I am writing to formally object to the proposed Site Allocation C27 for Gypsy and Traveller accommodation at the land east of Constable House on Adelaide Road.

I have been a resident of this estate for 30 years and have seen many changes in the local area, but this proposal raises serious and deeply concerning issues for our community. The proposed development would cause a number of significant problems, both for current residents and for any future occupants of the site.

Lack of Privacy and Obstruction of Views

The site is directly overlooked by numerous residential buildings, including Constable House, the Etons, Provost Road houses, and others. Placing a site in this location would offer no seclusion or privacy and would subject any families living there to constant visibility from hundreds of surrounding windows. In turn, the outlook for current residents would be severely affected, replacing green, open space with a densely used plot in full view of homes.

Loss of Green Space

This land is one of the last small green areas in our immediate neighbourhood. It provides a calm, natural respite in a heavily built-up part of Camden and is vital for both residents' wellbeing and local wildlife. Its removal would erase a valuable community asset.

Community Planting and Play Space Loss

Local residents and young people have recently invested time and effort in planting fruit trees and wildflowers here as part of a community project. Additionally, the site serves as an informal yet crucial play space for children from the estate. There is no alternative nearby, and removing this area would directly impact children's ability to safely play outdoors.

Access and Traffic Issues

Access to the site would require navigating already narrow and busy residential paths, increasing disruption for local residents. The proximity to Chalk Farm Station and the heavy pedestrian traffic from those commuting to Primrose Hill make this an unsafe and unsuitable location for a development of this nature.

Flooding History

The area has experienced repeated flooding in recent years, particularly around the proposed site. Building here would increase the risk of further damage to property and infrastructure.

Lack of School and Service Planning

There has been no evidence that adequate school places or access to local services have been factored into this proposal.

Lack of Consultation

To date, there has been no meaningful consultation with local residents. This proposal feels imposed rather than collaboratively considered, and it disregards the input and experiences of those who have lived here for decades.

Conclusion

For the reasons outlined above, I strongly urge that site C27 be removed from the Camden Draft Local Plan. It is wholly unsuitable for the proposed use, and its development would be a loss to the community,

not a gain.

Please confirm receipt of this objection. I would also like to register my wish to participate in the examination hearings into the Draft Local Plan before the Inspector.

Yours sincerely,

Penny Davis

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

Date: Tue, 24 Jun 2025 21:38:21 +0000

From: grace aggett

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

Subject: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025) Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

I am writing to emphasise the unsuitability of the land east of Constable Road House for the proposed Travellers site, as outlined below in the submission from the New Etons Residents Association. I am the leaseholder of [redacted address], Eton College Road, [redacted postcode].

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, [redacted postcode] - 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, [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.

I look forward to your response.

Kind regards,

Grace Aggett,

 [redacted postcode].

Responder 233

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Camden Local Plan: objections to site C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)
Date: 24 June 2025 22:40:37

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.

Dominic HARLOW

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

Dear Planning Team,

I should like to make representation in respect of the Camden Local Plan as described below.

OUTLINE OF 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

RATIONALE

1. **Outdoor 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
2. 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. Trees are a vital part of what makes Camden a pleasant borough.

3. **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.
4. **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.
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. There is **no independent access** to the site and serious disruption is likely to be caused to residents of Constable House and the surrounding and wider area. Access would also be immediately opposite the access to Eton Place.
7. 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.

With Best Regards

Dominic

Responder 234 and 240

From: [REDACTED]
To: [PlanningPolicy](#)
Date: 24 June 2025 22:45:17

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'm the owner [REDACTED] and I've been made aware of Camden Council's consultation to use the space next to Constable House as a gypsy and traveller site. This is located opposite one of the entrances to Eton Place at the bottom of Eton College Road.

There is much concern over this proposal. 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. Last, there are also concerns over the potential impact on the local community and surrounding areas.

Yours sincerely

Nadia Strappell



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.

Yours sincerely

Dr. Nadia Strappelli

Responder 235

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Objection to Proposed Development East of Constable House, Camden / Gypsy & Traveller Site
Date: 24 June 2025 22:50:11

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.

Dear Sir/Madam,

I am writing to object in the strongest possible terms to the proposed development of the green space to the east of Constable House in Camden for use as a Gypsy and Traveller site.

This area is a precious and irreplaceable green space that currently serves as an essential amenity for the residents of Constable House, Bridge House, and Eton College Road — in particular, the children and families who rely on it for play, fresh air, and a vital connection to nature. The eradication of this space would represent a severe and permanent loss to the community, undermining both physical and mental wellbeing, especially for those in already constrained living conditions.

Furthermore, the proposed development risks exacerbating longstanding issues of anti-social behaviour in the area. The site in question is closely bordered by residential buildings and already experiences pressures relating to safety, noise, and public order. Removing a green buffer and intensifying use without adequate consultation or infrastructure will only compound these challenges.

This proposal flies in the face of Camden Council's own stated commitments to improving green access, promoting inclusive and healthy neighbourhoods, and safeguarding the quality of life of existing residents. The lack of transparent community engagement and the absence of a detailed impact assessment make this application particularly alarming.

I urge you to reject this application and protect the wellbeing and rights of current residents. Any proposed use of this land must prioritise the existing community, environmental sustainability, and the preservation of public amenity.

Yours faithfully,

Paloma Strelitz

[REDACTED]

Part B – Please use a separate page for each representation

The Gloucester Avenue 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 style="width: 80px;" type="text" value="x"/>	No	<input style="width: 80px;" type="text"/>
(2) Sound	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80px;" type="text" value="x"/>	No	<input style="width: 80px;" 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 style="width: 100px;" 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: 100px;" 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: 100px;" type="text"/>
(4) Consistent with national policy	<input style="width: 100px;" 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 Planning Policy Team,

I write on behalf of the Gloucester Avenue Association to object formally 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). 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. Although other garden areas exist across the estate, 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.

4. Access and Deliverability - Physical and Functional Constraints

There is no independent vehicular access. Estate roads cannot accommodate trailers, service, or emergency vehicles.

Conflicts with:

- PPTS para. 13(b);
- Manual for Streets (DfT, 2007);
- Equality Act 2010.

5. Conclusion and Recommendation

The proposed allocation is unsound and should be removed on the basis of:

- Loss of valued amenity space;

- Overlooking and privacy conflicts;
- Unacceptable flood risk;
- Lack of deliverability.

We ask that a more appropriate, sustainable, and inclusive solution be found in consultation with all affected communities.

Yours faithfully,

The Gloucester Avenue Association

(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	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:	Martin Sheppard	Date:	24 June 2025
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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 237

Date: Tue, 24 Jun 2025 21:55:51 +0000
From: Stefanie Loher
To: planningpolicy [redacted], kemi.atolaqbe [redacted] uk,
nasrine.djema [redacted], Rebecca [redacted]
Subject: SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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

My name is Stefanie [redacted]

I want to object 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).

I respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan on the grounds that its allocation is unsound for the following reasons:

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Stefanie

Responder 238

From: [REDACTED]
To: [REDACTED]
Subject: Objection to Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy and Traveller Site)
Date: 24 June 2025 23:11:51

Some people who received this message 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,

As a resident [REDACTED], using the crossing every day on the way to Chalk Farm tube. I strongly object to the proposed plans for a Gypsy and Travellers Site.

The area is used by local families and numerous visitors every day. The proposal will significantly impact on the neighbourhood.

Yours sincerely,

J Sorensen
[REDACTED]

Date: Tue, 24 Jun 2025 23:15:33 +0100
From: D P
To: [redacted]
Subject: Site C27 – Land East of Constable House planning proposal

I'm writing to share my concerns and objections to the proposed designation of Site C27 - Land East of Constable House - as a Traveller site. I've been a resident of the neighbourhood for nearly 30 years and have always relished its mixed community. The diversity of backgrounds of residents is something to be supported but I object to the proposal on the following grounds.

The area and its surrounds are already under pressure. Chalk Farm Tube station is immediately adjacent with heavy footfall, plus bus lanes, and reserved bays for Zipper, scooter and bikes, so access is already challenging, especially for emergency vehicles. The local youth community has been planting flowers and fruit trees for the CommuniTrees Project. The proposed development of this site would be extremely deleterious to that community effort, as well as the greenery at this densely urbanised junction. The site backs on to a playground and the introduction of Travellers communities to the site, however wrong and prejudiced this may be, could mean that parents restrict their children activities. There are few enough places for children to play outside. We can't fight bigotry by helicoptering in communities into the heart of another without prior discussion with the existing residents. It would have been good if the Council could have brokered proper conversation about this but the allocation of this site to Travellers was not mentioned earlier in a consultation. Failure to consult properly with residents leads us to feel there have been gaps in procedure and a lack of transparency from the Council.

Thanks

D Perk

Responder 234 and 240

Date: Tue, 24 Jun 2025 22:25:08 +0000
From: Nadia Strappelli
To: PlanningPolicy
Subject: Re: Proposed Gypsy and Traveller Site next to Constable House on Eton College Road
[ACTION REQUIRED]

On Tue, 24 Jun 2025, 23:32 Simone Gozzetti, <[\[redacted email\]](#)> wrote:

Questa email spiega cosa fare c'è un word con cosa scrivere e sotto è indicata la email a cui spedire, per cortesia nella mail scrivi il tuo nome indirizzo preciso e che vivi lì.

----- Forwarded message -----

From: NERA <[\[redacted email\]](#)>
Date: Fri, Jun 20, 2025 at 10:52 AM
Subject: Proposed Gypsy and Traveller Site next to Constable House on Eton College Road [ACTION REQUIRED]
To: NERA <[\[redacted email\]](#)>

Dear all,

Thank you to those who have completed the AGM form [REDACTED]. If you haven't done it already, today is your last chance. The pack of documents for the meeting and the link for those joining online will be circulated late Saturday/early Sunday to give people a chance to absorb the contents before Monday evening. We'll include a copy of last year's AGM minutes in the pack because we're aware that not everyone has seen them.

Before that, we have an urgent matter for your attention: you might have already heard about Camden's proposals to locate a Gypsy and Traveller Site in the space next to Constable House at the bottom of Eton College Road (pretty much directly opposite the entrance to Eton Place). Links to all of the plans and the background are included below.

While we support Camden's efforts to provide space for this disadvantaged community, the selection of this site is wrong for a number of reasons.

- It is in an already crowded area next to Constable House and Eton Villas, and would be overlooked by buildings of more than [REDACTED] and the new development next to Chalk Farm tube station.
- It is very small (and actually smaller than the minimum size that Camden themselves recommend).
- It is next to a main road, a railway and an ambulance run - making it an unpleasant location for new dwellings.
- It will be highly impacted by the HS2 works for the next decade and add extra traffic to the area during the works for this.
- It's an area of high footfall; everyone walking from Chalk Farm station to Primrose Hill across the bridge will walk past it, and it will be highly visible and lack privacy.
- It will mean loss of green space and a playground for the residents of Constable House who seem to know nothing about the plan.
- It will have a knock-on impact to the local community and Primrose Hill, including the policing of these areas.
- The Traveller community don't like it and fear losing their current accommodations as a result (<https://www.camdenizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites>)

Representations can be submitted by email to [\[redacted email\]](#), and must arrive before 5pm next Friday 27th June. NERA will submit a representation on behalf of the leaseholders that it represents, and we are working with Parkgate Aspen and the company responsible for the new development next to Chalk Farm tube to encourage them to submit their own representations. Camden have indicated that groups who share a common view should submit a single representation, but experience tells us that the absolute volume of representations received is very much material in swaying the council's thinking.

Attached to this message, you will find an example representation produced by a neighbouring residents association who have direct experience of the planning process. If you feel motivated to make a representation, you can use this as a template.

Below you will find links to the relevant background information, as well as another example of a representation, this time courtesy of the Adelaide Road Tenants Association.

- The draft Camden Local Plan (see references to site C27 in Chapter 4, Chapter 7 and the Map): <https://www.camden.gov.uk/draft-new-local-plan>
- April 2025 Topic Paper (see para 4.7 to 4.12): <https://www.camden.gov.uk/documents/d/guest/camden-local-plan-proposed-submission-draft-site-selection-topic-paper-april-25>
- Borough of Camden Gypsy and Traveller Site Identification Study (see various references throughout to Land East of Constable House - site 1016 in maps): <https://drive.google.com/file/d/1Y9YFsB3D2UGbjkh0qr9QjSQnER1Q-tvQ/view>

- May 2025 Report:

<https://democracy.camden.gov.uk/documents/s124628/8+Camden+Local+Plan+Proposed+Submission+Draft+Cabinet+Report.pdf>

- ...and related documents: <https://opencouncil.network/meetings/61279>

- Selected extracts from the Camden Submission Draft Local Plan 2025: https://docs.google.com/document/d/1Op-Di2o_lvLGiixYOatA6jEASP1qLCpz

- Example representation from the Adelaide Road Tenants Association (ARTA):
<https://docs.google.com/document/d/1amhNlueyAUqd0wXcOXdiLVL2qi5CS2a>

Last point: to allow some of our Provost Road neighbours to participate in the discussion, this matter will be the first agenda item at the AGM on Monday. An incentive to arrive promptly...

All the best,

The NERA Committee

PS. If you no longer own a property in the Etons and/or just no longer want to hear from us, you can [unsubscribe here](#).

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. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

I therefore respectfully request that: - Site C27 be REMOVED from the Camden Local Plan submission draft in the following sections:

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

and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

Kind regards,

Dr Oliver Thomson
[redacted address]



Date: Wed, 25 Jun 2025 06:59:03 +0000
From: Alex Kartsel
To: PlanningPolicy
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan.

I submit this representation to 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). 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.

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- 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.

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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.

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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.

I 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,
Alex Kartsel.

ALEX KARTSEL, [REDACTED]

This message and its attachments are confidential and protected by law. If you are not the intended recipient of the message, please contact the sender immediately and delete the message with its attachments. Also, in that case, further dissemination of the message or its attachments, as well as sharing or disclosing their content in its entirety or part is strictly forbidden.

Responder 244

Planning Policy
Camden Town Hall
Judd Street
London WC1H 8EQ

Dear Sir/Madam

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**.
- There is risk of **overcrowding** on this small site with little consideration for the impact on Travellers or neighbours
- There must be planning for utilities, water, sanitation, waste collection and these arrangements should be set out

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.

hfully

Denise Joseph

Responder 245

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)
Date: 25 June 2025 09:12:58

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.

Dear Sir

I wish to register my objection to the proposed use of the green space east of Constable House as a Gypsy/Traveller Site.

I am a lease holder.

In my view the proposed site is not suitable for this intended purpose for many reasons.

It is too small to house a gypsy and traveller community and totally lacking in amenities.

It is directly overlooked on many sides by neighbouring flats and houses.

It is hemmed in by residential roads making vehicular access very difficult - certainly unsuited to large vehicles, trailers or emergency services.

A better use of this space might be to build some social/affordable housing - something that the area is crying out for.

Best regards

Michael Broderick