

Responder 246

Date: Wed, 25 Jun 2025 08:16:53 +0000
From: James Sawtell
To: planningpolicy@camden.gov.uk
Subject: Response to allocation of Site C27

I am writing to object to this section of the Camden Local Plan.

The site you are proposing as a Gypsy and Travellers Site is immediately opposite Bridge Approach and Chalk Farm Bridge - **this is a vital artery for the whole of the Primrose Hill area.**

This artery is in constant use for:

Local residents: It is a crucial artery used every day for local people to access transport links - buses and tubes on Adelaide Road, Haverstock Hill and Chalk Farm Road. From children, young people and families on their school routines in the morning and afternoon, regular commuters throughout the day going to and from work including people working in Primrose Hill, as well as local young people from local families going to and from the area in the evening. **It is vital this artery always remains a safe conduit for everyone, especially in the evening when local young people are more vulnerable.**

Many young visitors: Primrose Hill has seen a massive increase in visitors over recent years (during and post COVID) attracted by the local amenities - bars and restaurants and Primrose Hill itself. The scale of the increase has led to well publicised anti-social issues that have resulted in Primrose Hill Park being closed from 10pm to 6am on Friday, Saturday and Sunday for part of the year (with new gates installed). **I would imagine it is important for all concerned that safe access to the area for such a huge number of people remains a top priority.**

Please note that many residents have only become aware of this proposal in the last few days. I consider this to be an inadequate consultation process on such an important issue for residents.

Because of the unfortunately short interval between my discovery of the plan and the date for the closure of the consultation, my formal response is limited to a strong endorsement of the excellent response of the Adelaide Road Tenants Association (attached).

James Sawtell

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="James"/>	<input type="text"/>
Last Name	<input type="text" value="Sawtell"/>	<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

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 am 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,

[Redacted signature]

(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 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 247

Date: Wed, 25 Jun 2025 09:16:58 +0100
From: Darren Wallace
To: [redacted]
Subject: Objection to Site C27 – Land East of Constable House, Adelaide Road - Gypsy & Traveller Site - Proposed Submission Draft Regulation 19, 2025

Dear Sir/Madam,

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.

I've lived in [redacted] for twenty-five years. Whilst I absolutely support Camden's responsibility to provide accommodation for Gypsy and Traveller families, this 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 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 e-scooter, bike and Zipcar bays. People come and go day and night. It also backs onto the Constable House children's playground.

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.

In addition, 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. 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. Its removal would take away a calm, natural space in an already built-up and densely populated environment.

This proposal has progressed without any consultation with local residents. I believe that details of the proposal were published on your website on Christmas Eve 2024 - which if one was cynical might consider as a particularly good day to bury bad news.

The allocation of Site C27 was not disclosed during earlier consultation rounds and our residents' association 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 undermines the legitimacy of the allocation and suggests procedural unfairness.

Finally, I'd like to note that site C27 fails multiple policy tests according to Camden's own 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 tranquility

I strongly 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 options to be considered. I urge Camden Council to work to identify more suitable alternatives that prioritise safety, dignity, and real community integration,

Sincerely yours,

--

Darren Wallace
[redacted address],
[redacted]

Responder 248

From: [REDACTED]
To: [PlanningPolicy](#)
Cc: [Sarah Rubinstein](#)
Subject: This Gypsy and Traveller Site Identification Study
Date: 25 June 2025 09:24:42

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

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

I would like to comment on the proposed Gypsy/traveller site next to Chalk Farm Tube.

I object to this proposal for the following reasons:

1. The site is too small
2. It is difficult to access this site
3. The streets nearby are too narrow
4. Eton College Road is a road often used to access Belsize Park and avoid traffic on Adelaide Road.
5. Adelaide Road is a very important and busy traffic route that would not be able to deal with larger vehicles – especially if they need to turn into a narrow road.
6. The area near is used to parking bicycles close to the Chalk Farm tube station which is further clogging the street but very much needed.
7. The only area nearby dedicated to children is in Primrose Hill – this is a classic location for a playground

Regards

Arnon Rubinstein

[REDACTED] Belsize Park

Responder 249

Date: Wed, 25 Jun 2025 09:27:11 +0100
From: Clare Bernhard
To: [redacted]
Subject: Site C27

Hello

I am writing my objection to this proposed site. Local services are already very stretched, this site will be an eye sore, there is very little green space in the immediate area

**Thanks
Clare Freeman
[redacted address]**



Responder 250

Date: Tue, 24 Jun 2025 13:22:07 +0100
From: Anna Park
To: [redacted]
Subject: Objection to gypsy/travellers site in Chalk Farm

London [redacted postcode]
[\[redacted email\]](#)
24th June

Planning Department

London Borough of Camden
London [redacted postcode]

Subject: Objection to Proposed Traveller Site in Chalk Farm

Dear Sir/Madam,

I am writing to formally object to the proposed development of a traveller site in Chalk Farm. As a trader operating in a nearby community, I have significant concerns about the potential impact this development could have on local businesses, the trading environment, and the broader community.

Firstly, the increased congestion and potential strain on local infrastructure could detrimentally affect customer access to our businesses. The area already experiences substantial foot and vehicle traffic, and additional pressure may deter visitors, impacting trade viability.

Secondly, the proposal may affect the community's perception of safety and cleanliness, which can influence consumer behaviour. Traders rely heavily on a vibrant, welcoming environment to attract patrons, and any changes that might alter this dynamic could jeopardise livelihoods.

Lastly, I am concerned about the possible lack of integration support for both the traveller community and existing residents, potentially leading to social tensions. It is essential for any development to foster harmonious community relations, something that requires careful planning and resources.

I urge the planning authority to consider these points and the broader economic and social consequences of the proposed development. A thorough impact assessment, including consultation with local traders, would be pivotal in ensuring that the interests of all community members are duly considered.

Thank you for considering my objection. I look forward to your response and the opportunity for further discussion on this matter.

Yours faithfully,

Anna Park
[\[redacted email\]](#)

Anna Park



Responder 251

Date: Wed, 25 Jun 2025 08:31:23 +0000
From: Andrew Triggs
To: Rebecca Burden, Lisa Tang
Subject: FW: Neighbourhood Forum comments on Camden Draft Local Plan

Dear Andrew,
Thank you for the opportunity to comment on the new Draft Local Plan.
The amendments sought by Redington Frognal Neighbourhood Forum are now attached.

With kind regards,

Nancy

Nancy Mayo

[Redacted]

[Redacted]

REDINGTON FROGNAL
NEIGHBOURHOOD FORUM

Local Plan Submission Draft, April 2025
Policy comments by Redington FrognaI Neighbourhood Forum

Policy H1 Maximising Housing Supply

It should be noted that this policy is to be applied alongside, and in accordance with, policies NE1, NE2 and NE3.

Policy NE1 The Natural Environment

Para. 11.13 “Local ecological networks” to be included among gardens to be protected. Eg:

“One neighbourhood plan in Camden has identified gardens as constituting a local ecological network and another has proposed wildlife corridors that cross gardens, which those plans seek to protect and enhance.”

Para 11.14 “Hedges” to be added:

Part of the established character of garden spaces may also be defined through features such as **boundary hedges** railings and garden walls.

Policy NE1 The Natural Environment

A.

5. protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;

Change to:

5. protect non-designated spaces with nature conservation, townscape and amenity value, including **private gardens which, cumulatively, may constitute a local ecological network**, where possible;

8. expect development to protect and enhance biodiversity in line with Policy NE2 (Biodiversity);

Change to:

8. expect development to protect and enhance biodiversity in line with Policy NE2 (Biodiversity) **and neighbourhood plan policies.**

Policy NE2 Biodiversity

A 4. Change green roofs to **living roofs** and also emphasise that **living roofs alone are not sufficient mitigation for loss of soft natural surface and/or trees and shrubs and other vegetation of value to wildlife.**

A 6. It should be noted that Neighbourhood Plans may have their own, higher net gain or urban greening scores. Planning application 2023/5366/P, for example seeks a gain of 43%, which is deliverable at many locations.

A 7. Add “as ecological networks” after “offered by gardens and soft landscaping,”

Para. 11.13 Some neighbourhood plans in Camden have also **designated local ecological networks and** identified.....”

Para. 11.41 should note the designation of private residential gardens as an ecological network in the Redington Froggnal Neighbourhood Plan Area (policy SD 1).

Policy NE3 Tree Planting and Protection

Para. 11.64. The Neighbourhood Forum would like it to be noted that trees should not be felled to facilitate development, and should be incorporated into new development, in accordance with best practice, set out by Trees Design and Action Group in its publication, *Trees Planning and Development: A Guide for Delivery*.

A This policy should be far more ambitious in tree planting standards for new developments. An appropriate number of trees per dwelling might be three, as required by Waltham Forest (*Planning Obligations Supplementary Planning Document*, Waltham Forest, November 2008).

The policy should also specify soil volume requirements to enable trees planted to survive to maturity.

Hedges deliver benefits which are as significant as the benefits of trees. There should be a commitment to preserve these, where possible, and require the incorporation of hedges as front, side and rear boundaries.

It should be noted that the Council will apply **Guidance Tree Preservation Orders and trees in conservation areas** and, specifically, under:

"Individual, collective and wider impact"....."The authority is advised to also assess the particular importance of an individual tree, of groups of trees or of woodlands by reference to its or their characteristics including":

"Contribution to, and relationship with, the landscape; and Contribution to the character or appearance of a conservation area."

<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#making-tree-preservation-orders>

Paragraph: 008 Reference ID: 36-008-20140306

Revision date: 06 03 2014

Additionally, *"Site visits should record the tree's or trees' importance as a wildlife habitat."*

Paragraph: 022 Reference ID: 36-022-20140306

Revision date: 06 03 2014

Policy CC1 Responding to the climate emergency

The title should be revised to Responding to the climate **and ecological** emergency.

All references to the climate emergency should be similarly revised to “the climate **and ecological** emergency”.

Suggested additions are shown below in red font.

CC1 A . 7. **Expanding**, protecting and enhancing existing green spaces and water sources, enhancing biodiversity, strengthening nature recovery and providing multi-functional green infrastructure

Para. 8.8. Building with Nature Standards should be added and “green roofs” changed to “living roofs”.

“This should cover:

- reducing waste and circular economy principles;
- energy efficiency;
- overheating and cooling;
- green infrastructure (for example, inclusion of a **green living** roof, green sustainable drainage features);
- water efficiency; and
- BREEAM assessment (where relevant)
- **Adopted Building with Nature Standards.** “

Policy CC2. Prioritising the retention of existing buildings

C. The Council will only permit proposals which include substantial demolition where it can be demonstrated to the Council’s satisfaction that:

Add: 4. The space released will be used to provide new green space and wildlife habitat.

Policy CC4 Minimising carbon emissions

The text should incorporate a commitment to train planning officers in differences between embodied and emitted carbon.

Policy CC5 Sustainability improvements to existing buildings (retrofitting)

Change green roof references to living roof, eg at:

- C. 6.** installation of a **green living** roof or **green living** and blue roof; and

To be added,

C. 8 Retrofitting will entail removal of hard surface and its replacement by vegetated natural soft surface and blue infrastructure (eg ponds), to act as carbon sinks, wherever possible.

C.9 Adopted Building with Nature Standards are to be incorporated into improvements to existing buildings.

Policy CC8 Overheating and Cooling

Additions in red font below to be incorporated:

- A. 1.** support proposals which **make use of nature-based solutions and** seek to adapt and improve existing buildings to improve natural ventilation, address overheating and promote natural (non-mechanical) cooling, where they are in accordance with other policies in this Plan;

In A 1 above a definition is needed for “natural (non-mechanical) cooling”. This could be defined in para. 8.107 as **“tree and hedge planting, especially to the west and south west of buildings”**.

Para. 8.113. A further bullet point should be added, as follows:

- **Blue infrastructure, such as wildlife ponds, should be incorporated, wherever possible.**

Policy CC10 Flood Risk

A sub policy C is needed, stating that,

- C. 1.** **The planting of trees with a high water requirement, eg poplar, willow and oak, will be prioritised, together with hedge planting.**
- C. 2.** **The incorporation of ponds and daylighting of lost rivers will be favourably considered.**

Para. **8.136** should require applicants to note the locations of spring lines and lost rivers, eg as shown on the Redington Froggnal Neighbourhood Forum website at:

<https://www.redfrogforum.org/underground-rivers/>

Para. 8.149 It is therefore necessary for development to reduce pressure on the sewer system by minimising surface water run-off through the application of the London Plan drainage hierarchy, which is set out opposite, and blue infrastructure. The excavation of natural wildlife ponds can be very successful for attenuation, as at the re-excavated Branch Hill Pond.

Policy CC11 Sustainable Drainage

The aspiration for water runoff should be more stringent in the Counters Creek catchment area.

E In the Counters Creek catchment area (shown on the Planning Policies Map) applications for basement development, and other development vulnerable to flooding in areas identified at risk of flooding, should seek to reduce surface water run-off rates to ~~be as close to~~ **below** the greenfield run-off rate as feasible.

Policy SC4 Open Space

There should be a commitment to apply the public open space standards for all new residential development. Currently, it does not appear to be being applied and, instead, existing open space is becoming over-used.

B. Add B d. loss of vegetation and development of sites of interest for nature conservation, and sites with the potential to become of interest for nature conservation, will not normally be permitted.

Policy D1 Achieving Design Excellence

Sub policy A should be amended to include reference to the climate and ecological emergency and nature.

A. All development in Camden must achieve excellence in the architecture and design of buildings and places, responding to the climate **and ecological** emergency, improving the **nature and the** health and well-being of our communities

B. 3. Add “and designated non-heritage assets” eg:

preserve or enhance the historic environment and heritage **and designated non-heritage** assets in accordance with Policy D5 (Historic Environment);

15. Add “incorporate nature-based solutions, wherever possible.”

C. 6. Delete “biodiversity” and change to “biodiverse natural habitat”.

“incorporate high quality landscape design and maximise opportunities for greening, to enhance ~~biodiversity~~ **biodiverse natural habitat**, promote health and well-being, manage flood risk, and provide opportunities for shade; for example through the planting of trees and the provision of open space, soft landscaping, rain gardens and areas for food growing.

D. Add “and neighbourhood plans”.

Developers must evidence how they have responded positively to the design policies in the Local Plan, ~~and~~ associated guidance **and neighbourhood plans**, as part of the Design and Access Statement submitted with their planning application.

Para 12.8. Add bullet point, “landscaping and natural habitat creation”.

Para. 12.11. The bullet points below have been incorrectly separated:

- guidance set out in the National Design Guide and National Model
- design codes; and

Para. 12.12. Add “landscaping and natural habitat provision”:

- requesting that detailed designs, scaled drawings, plans, elevations, sections, **landscaping and natural habitat provision** and supporting information are provided to illustrate a proposal, where appropriate;

Para. 12.13. Add “**and landscaping**” and change “biodiversity” to “**ecological mitigation (eg by incorporating biodiverse natural habitat)**”.

The **landscaping**, size, layout and materials used in the spaces around buildings will influence how people use them, and help to create spaces that are welcoming, attractive, safe and useful. They can also contribute to other objectives such as reducing the impact of climate change (for example, the use of trees and planters to reduce run-off and provide shading), **biodiversity**, **ecological mitigation (eg by incorporating biodiverse natural habitat)**, local food production and Sustainable Drainage Systems (SuDS), and provide useful amenity space.

Policy D3. Design of Housing

A. 12. seek the delivery of biodiversity enhancements in line with Policy NE2 (Biodiversity)

Change to:

12. Seek the delivery of biodiversity enhancements in line with Policy NE2, including the incorporation of features of value as wildlife habitat, eg eaves and bird bricks.

Policy D4 Extensions and Alterations to Existing Buildings

Para. 12.70. This paragraph should additionally include mention of harm to the significance of a **designated or non-designated heritage asset and its setting** will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset **and its setting**.

Policy D5 Historic Environment

Redington Frognal Neighbourhood Forum has been assured that non-designated heritage assets in the Redington Frognal Conservation Area will be managed in the same way as designated heritage assets. It is therefore requested that this is explicitly noted throughout Policy D5.

Sustainability improvements to designated **and non-designated** heritage assets

G. The Council will support proposals to adapt and improve the energy performance of listed buildings, and buildings within conservation areas, to reduce energy demand, strengthen resilience, mitigate the impacts of climate change, and ensure they are adaptable to a changing climate in accordance with the policies set out in the climate change chapter of this Plan. Add: **This can include the provision of living roofs and**

species features such as bird and bat boxes, eaves and bird bricks and new biodiverse planting.

However, living roofs alone are not sufficient mitigation for loss of soft natural surface and/or trees and shrubs and other vegetation of value to wildlife.

Policy D6. Basements

The following additions (in red font) are requested.

- D. 5.** avoid the loss of garden space and soil volume, including for tree planting, and of trees of townscape, biodiversity or amenity value from construction work or due to the creation of a new access or lightwell.

Para 12.139. Add information on minimum soil depths.

Large canopy trees are of particular importance, necessitating minimum soil depths of 3 metres.

05. West Camden

Site Allocation W6

Land to rear of Meridian House, 202- 204 Finchley Road

The Redington Frogna Neighbourhood Forum does not support this site allocation in an area of deficiency in green space and with much underground water.

Instead of the proposed over-development on the car park behind an existing office block, the Neighbourhood Plan proposes that agreement be sought with the landowner to develop the site in the way set out in the Redington Frogna Neighbourhood Plan.

Redington Frogna Neighbourhood Plan guidance for possible redevelopment site RF 1: Meridian House, envisages a comprehensive redevelopment of the site. This would completely transform the streetscape of this run-down stretch of Finchley Road. Enhancement would be achieved by setting the building back from the street to enable the creation of new green public realm in an area which is severely green space deprived.

The concept for the rear of the site envisages substantial greening and biodiversity measures, including trees, native hedgerows, providing a link to the adjoining copse where many trees have recently been felled. The site is located in an area which features much underground water and was formerly characterised by many natural ponds. A natural pond here would help to attenuate rainwater deliver a nature-based flood relief solution for problems further downstream, eg at South Hampstead.

The Redington Frogna area lacks community facilities and this site has the potential for a community facility to aid community cohesion.

The owner of Meridian House is likely to be supportive of the guidance set out in the Neighbourhood Plan.

Site reference RF 1: Meridian House on page 62 of the NP:



Responder 252

From: [Catherine Horwood Barwise](#)
To: [PlanningPolicy](#)
Subject: Comments on Gypsy and Traveller Site Identification Study Site 1016
Date: 25 June 2025 09:36:05

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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.

We are writing to formally object to the proposed allocation of Site 1016 – Land east of Constable House, NW3 3QA – for a Gypsy and Traveller site.

This site represents a rare and valuable small piece of open green space in our area, providing not only environmental and visual relief for the people who live around it but also supporting local biodiversity. It would be particularly ill-advised to remove such space in a built-up part of Camden where green areas are already in short supply.

Additionally, this site is known to be prone to flooding, raising serious concerns about its suitability for any form of development. The potential removal of any green space would only worsen these risks.

We urge you to reject this suggested site and to prioritise the preservation of open, green land space in Camden. We are sure from your listings that there are many other brownfield sites in Camden that would be more suitable.

With regards

Professor Patrick Barwise and Dr Catherine Horwood Barwise

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



Date: Wed, 25 Jun 2025 08:44:41 +0000
From: Ros Eisen
To: PlanningPolicy@camden.gov.uk
Subject: Travelers Planning Permission

As a resident of Belsize Park, I most strongly disapprove of Travelers being housed near Chalk Farm or Swiss Cottage.

Camden already has a drug problem to deal with, also a huge problem of people sleeping rough, petty crime is increasing so why make matters worse by allowing Travellers to live anywhere in Camden, and who is going to police them?

It certainly does not make sense.

Signed

Rosalind Eisen (miss)

[Redacted signature]

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

Responder 254

From: [Joshua Ejdelbaum](#)
To: [PlanningPolicy](#); [Kemi Atolaqbe \(Clr\)](#); [Nasrine Djemai \(Clr\)](#); [Rebecca Filer \(Clr\)](#)
Cc: [Ajok Athian \(Clr\)](#); [Anna Burrage \(Clr\)](#); [Matt Cooper \(Clr\)](#)
Subject: Draft Local Plan - Objection to Site Allocation C27
Date: 25 June 2025 09:47:31

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FAO: Camden Council Planning Policy Team

Dear all,

As well as the below objections which I support, I wanted to inform that there is considerable community backlash against the proposals, in particular, the appearance that these seem to have been forced through against standard procedure and without the full consultation process. This gives the appearance of impropriety. (see point 5 below). I'd be grateful for an explanation as to why the site was not included initially (and if only selected at a later date, only rushed), despite not meeting the selection criteria (point 6).

I have cc'd my local councillors, and await an answer as to why this process has not been transparent and to remove any arguments of wrongdoing.

In addition to the above question, please do register the objection below.

Many thanks,

Joshua Ejdelbaum

My name is Joshua Ejdelbaum 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, 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,

Responder 255

From: [MJ](#)
To: [PlanningPolicy](#); [Kemi Atolaqbe \(Cllr\)](#); [Nasrine Djemai \(Cllr\)](#); [Rebecca Filer \(Cllr\)](#)
Subject: Objection to Site Allocation C27 (Gypsy And Traveller Site)
Date: 25 June 2025 09:51:42

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FAO: Camden Council Planning Policy Team

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

My name is **Dr Mihael Jeklic** and I live in Primrose Hill, near 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. 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. 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;
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- 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 questionable.

This 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, COMPLETELY undermining effective participation.

This lack of transparency and failure to consult affected residents earlier in the process corrupts 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 Mihael Jeklic, LLB LLM MSc PhD

Date: Wed, 25 Jun 2025 09:51:53 +0100
From: Stephanie Mercier
To: [redacted]
Subject: Camden Local Plan: Objections to site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

I am writing as a local resident to formally object to Camden Council's proposal to establish a gypsy and traveller site on the land east of Constable House, off Adelaide Road.

This proposal raises several serious concerns for the local community, which I urge the Council to consider carefully:

1. **Overcrowding:** The area is already densely populated and under considerable pressure in terms of housing, traffic, and infrastructure. Introducing a high impact site in an already congested environment risks straining public services and facilities even further.
2. **Loss of Green Space:** The proposed site would result in the loss of a green area in our neighbourhood. Although not the prettiest, it still serves as a buffer in an otherwise built up urban area.
3. **High Footfall and Traffic Impact:** Adelaide Road is already a busy thoroughfare, particularly during school hours and rush times. Additional vehicle and pedestrian traffic generated by the proposed site will increase congestion.
4. **Community Safety and Policing:** Most importantly, many residents, including myself, are concerned about the potential for increased crime and anti social behaviour. The strain on local policing resources is already evident. There are constant, visible theft events in our local shops. There are break ins in cars and homes. The council approved establishment of a community of people known for defying authority and flaunting societal norms will only exacerbate existing challenges in maintaining community safety and cohesion.

While I recognise the need to accommodate all members of society, including the traveller community, I believe this specific location and general area are unsuitable and potentially detrimental to the well being and safety of the existing local population.

I urge Camden Council to reconsider this proposal and explore alternative sites that would have less impact on already stressed urban areas and the people who live in them.

Kind regards,

Stephanie Sarikahani

[redacted address]

[redacted address]

Date: Wed, 25 Jun 2025 09:53:47 +0100
From: Chris Khouri
To: [redacted], [redacted]
Subject: 55-[redacted address] RTA - Recycling Center Objection

My name is Christopher Khouri and I am the chairperson of the [redacted address] Recognised [redacted address].

I would like to formally submit the RTA's objection to the proposed location of the Recycling Centre on Holmes Road as part of Camden's Draft Local Plan (2025).

There are alternative local centres readily available (i.e. Holloway Road) and locating a recycling center on Holmes Road in a residential area and close to schools is unwanted by ourselves and the local community.

Please do not approve the proposed location of the recycling center on Holmes Road due to:

The proximity to our homes, children's schools and local businesses. This would negatively impact our quality of life.

Concerns around health and the environment. It raises issues around public health and safety.

Damage to community character and value. Holmes Road **is** a residential area with a local community. Placing a Recycling Center in the neighbourhood is not in keeping with this community spirit.

Please just let me know if you would like to discuss any of the above in further detail.

Kind regards,
Chris.

To Whom It May Concern:

As chairperson of the 55-57 Holmes Road Recognised Tennants Association (RTA), I wanted to reiterate our strong opposition to the proposed location of the recycling centre on Holmes Road, as part of the new draft plans.

I appreciate that the Inkerman Area Residents Association (IARA) has been in contact with you separately, and we are very supportive of their objections to the proposed recycling centre location. However, we feel it is also important to stress that we, as residents of Holmes Road, are also extremely concerned by the proposed location of the centre and the negative impact it would have.

Revitalising the neighbourhood is a wonderful objective and it is fantastic that Yoo Capital are looking to develop the Camden Film Quarter. However, placing an unneeded recycling centre in the middle of a residential street and in such close proximity to schools is unwanted. We understand there are some 360+ signatures from local residents confirming their opposition to the planned location, and we very much hope you take this into consideration.

I am happy to discuss any of the above in greater detail, and would appreciate it if we can be included in any community discussions going forward.

Kind regards,
Chris.

Responder 258

From:
To:
Subject:
Date:

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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.

Name: Oscar
Address: Martjanovs

[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:

This small space has great value for those of us living at Constable House,

not just visually, but socially and practically. Several key concerns make this location unsuitable for such allocation:

- Footfall and exposure: The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian routes in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.

- Loss of privacy for residents/future occupants: The site is directly overlooked by numerous residential buildings, including Constable House (4–5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion nor privacy. Any families placed in this location would be living in full view of surrounding properties.
- Loss of green space: This is one of the last small green areas in our immediate neighbourhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.
- Community planting: Over the last few months, fruit trees and meadow of wildflowers were planted there as a part of the Community Trees project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.

Playground space: The site is used by children from Constable House and neighbouring homes as an informal but essential play area and for other physical activities. There are no obvious alternative spaces available nearby. Removing this space would take away one of the few places where local children can safely play outdoors.

- Access issues:

The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both residents and any future occupants of the site.

- Flooding history:

The area has recently experienced repeated flooding as it is situated below the general level of surrounding area. Developing on this

ground would risk further complications for both the site and surrounding buildings.

- No clear planning for school places:

There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.

- No Consultation:

There has been no meaningful consultation with local residents and detailed plans provided regarding the proposed use of this site.

Conclusion.

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

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

Thank you.

Kind regards.

Oscar Martjanovs.

Responder 259

From:
To:
Cc:
Subject:

Date:

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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

Please find below objection and comments in relation to site C27

Kind regards
Amit

PERSONAL DETAILS

Name: MR AMIT SALUJA

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

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**.
- **Increase in motorists** in an already very busy area.
- **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.
- **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.

- **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).

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.

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

Responder 260

Date: Wed, 25 Jun 2025 09:23:51 +0000
From: Sandie Grant
To: PlanningPolicy@camden.gov.uk
Subject: Travellers site

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

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Strongly object.

This is the last thing Camden residents need. We are overcrowded enough already. Where is health and safety, sanitation and residents human rights to live in a decent community who pay their taxes.

Sandra Rawlings
Sent from my iPhone

From:
To:
Subject:
Date:

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 the Camden Council Planning Policy Team,

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

1. Loss of Valued Community Amenity Space

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

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

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

2. Overlooking and Loss of Privacy

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

current residents and future site occupants.

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

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

3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

4. Access Constraints and Undeliverability

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

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

5. Unsound Site Selection Process and Lack of Transparency

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

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
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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

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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.

With much appreciation,

Lance Bai

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Responder 262

Date: Wed, 25 Jun 2025 09:25:36 +0000
From: Miles Seaman
To: PlanningPolicy
Subject: Draft Local Plan Submission Version

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="Miles"/>	<input type="text"/>
Last Name	<input type="text" value="Seaman"/>	<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: Sarre Road Residents Association (SARRA)

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

Documents can be found at the following links:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="W1.L.11"/>	Policies Map	<input type="text" value="W7"/>
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4. Do you believe the Camden Local Plan Proposed Submission Draft is:

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

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

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

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

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

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

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

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

<p>The policy map presented in the Submission Draft implies that the whole of the reservoir area is designated for development. It is not clear from the Development and Design Principles set out in the policy document how the undesignated area is to be defined. These principles appear to allow for consideration of plans for a Residential Care Home which would imply the use of the whole site (including the SNIC). Such a development has been clearly rejected by previous planning applications on the grounds of protecting the SNIC.</p>

The means by which the designation of areas on the site have not been shown to be consistent with previous claimed usage of the site. The designation of the SNIC which has been arbitrarily derived from a sketch/drawing of the site that is no longer evidenced in the designation that has been agreed (not shown in Allocation W7). The manner in which this designation was established has never been properly explained although this matter has been raised with Camden Planning department on several occasions. In particular the original sketch which purported to be the basis on which the area on which a housing development could be made was narrower at the northern end. Hence it is contended that any proposed development is unlikely to be physically or economically viable given the very limited area available for any housing development under the assumption that the SNIC is excluded.

With regard to making the disputed undesignated site available, it is noted that this would require very substantial site preparation, as the removal of the current reservoir structure which would be very costly and would severely disrupt the near neighbours to the site on Sarre Road. Under "Other Considerations" in Allocation W7 it is noted that a predemolition audit is required. A demolition of the reservoir roof would disrupt wildlife on the site thus negating the rationale for designating the majority of the site as SNIC.

I refer to the many comments on the planning application 2018/3692/P which should be part of the "Context" for the allocation. This application was considered by a preassessment panel chaired by an officer from the planning department (John Diver). A substantial amount of evidence was presented to this panel including many objections by residents of the area including one from me and my neighbours. This contains a substantial number of documents raising questions and observations regarding a submitted plan for the development of the so-called frontage scheme. The submission on behalf of myself and my neighbours is contained on the site for the application cited above and is referenced on this site as submitted on 19/09/2018 16:48:04. 13 other responses are recoded on database recoding objections and observations on the plan thus submitted. In essence it is clear that no action has been taken to address the provenance or logic pertaining to the undesignated land immediately adjacent to the frontage on Gondar Gardens.

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.

It would be logical do designate the whole area of the reservoir as shown on Allocation W7 as SNIC and hence negate the prospect of developing housing on any part of this site. The site could then be considered for other amenity use such a recreation facilities or general open space. Such plan would require physical development management as outlined by Gondar Gardens Residents Association (GARRA) in the proposed application.

(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

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:

Reaction to such plans in the abstract is not be possible as it is not clear from the submitted site allocation what any proposal for the development of this site would finally look like. In particular the exact geometry of the SNIC and undesignated area is not specified in the Plan.

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:	18 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 263

From: [Planning](#)
To: [PlanningPolicy](#)
Subject: FW: Allocation of Site C27
Date: 25 June 2025 10:28:35

Barry Dawson
Information and Monitoring Officer

Telephone: 020 7974 3560

From: Lindsey Milligan [REDACTED]
Sent: 25 June 2025 08:00
To: Planning <Planning@camden.gov.uk>
Subject: Allocation of Site C27

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,

I reach out today as I strongly object to this section of the Camden Local Plan. Is there a formal note I should file to have this objection on record?

Many thanks,

Lindsey O'Hagan

[REDACTED]

Responder 264

Date: Wed, 25 Jun 2025 10:37:50 +0100

From: Jonathan Lionel

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

Subject: Big No - Proposed permanent travellers site next to chalk farm station

no

no

no

From:
To:
Subject:
Date:

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).

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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 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.

Claire Bell

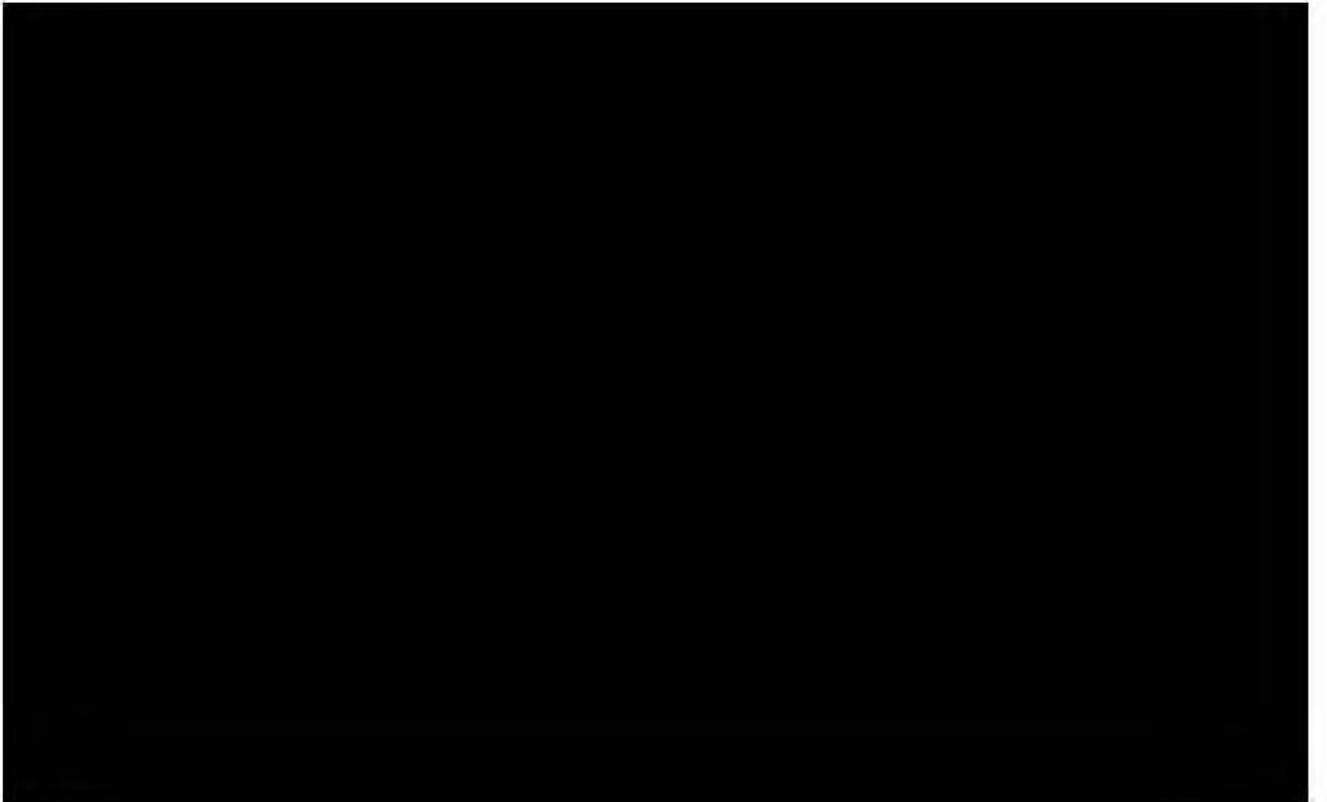
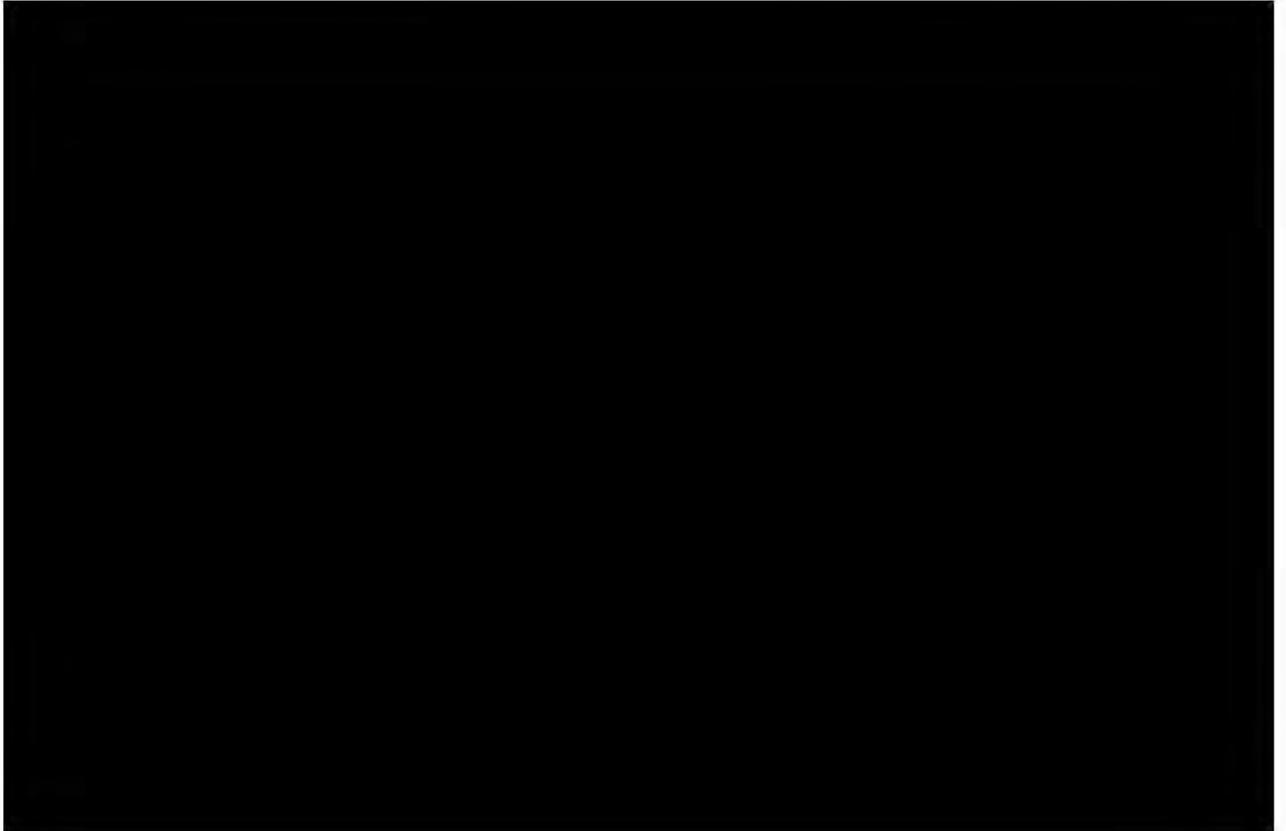
Responder 266

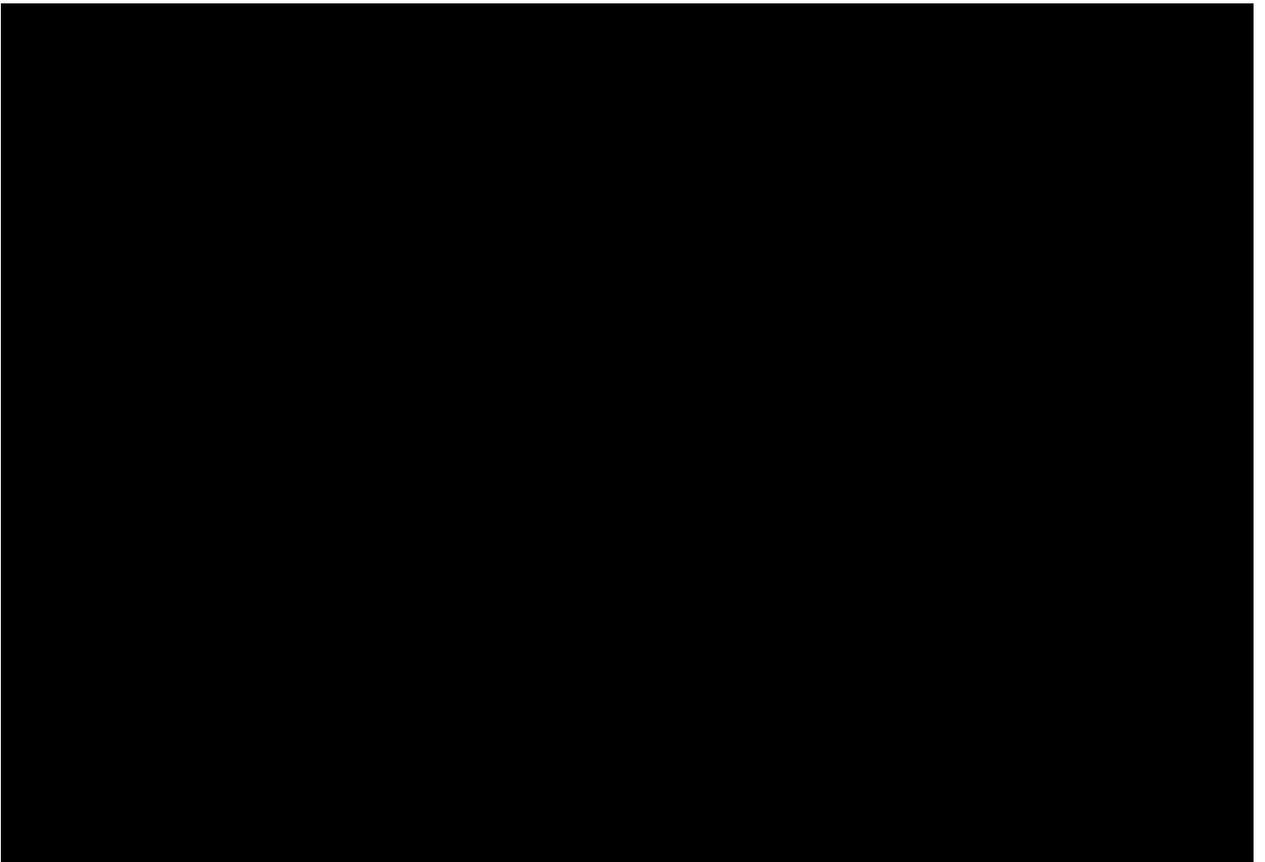
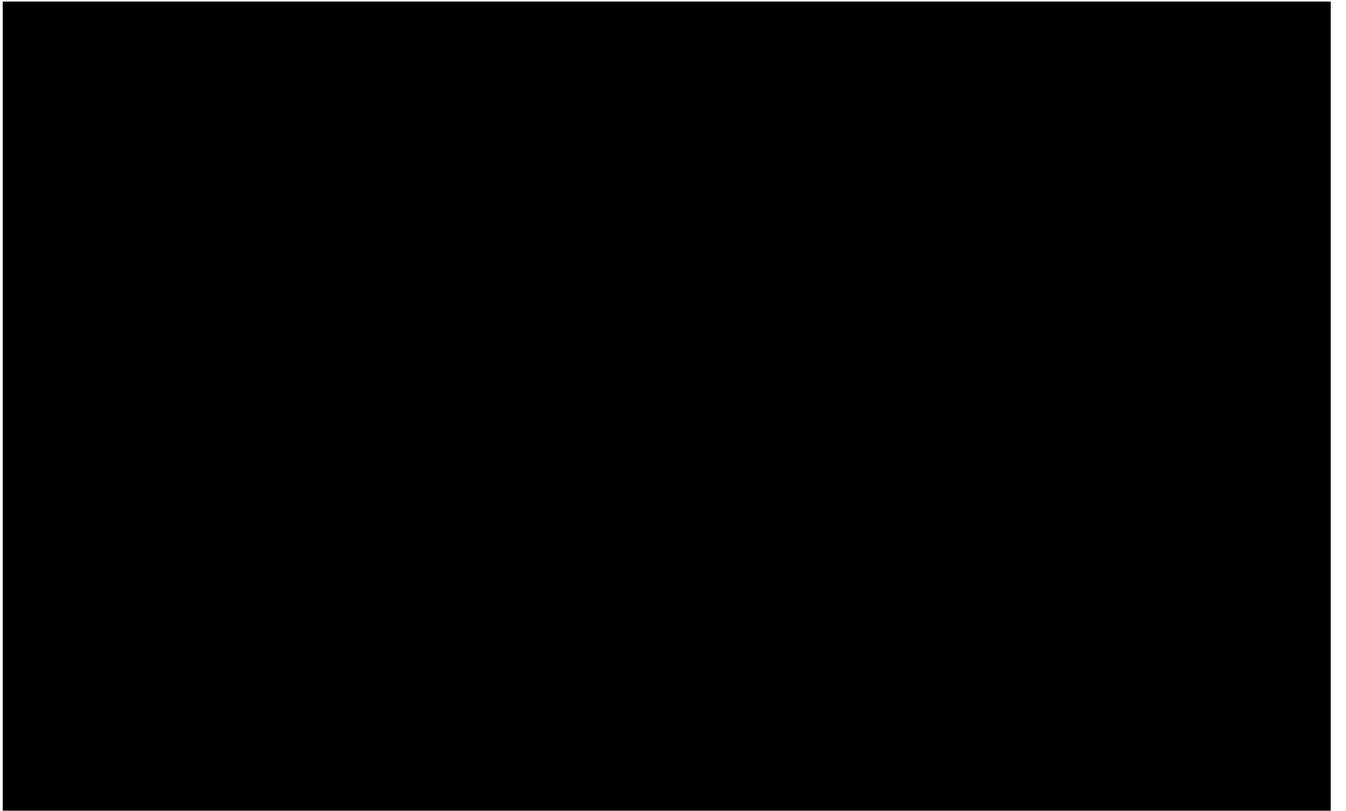
Date: Wed, 25 Jun 2025 10:50:25 +0100

From: N Lees

To: [redacted]

Subject: Objections to site C27 land opposite Constable Site- proposed gypsy camp





Responder 267

Date: Wed, 25 Jun 2025 09:52:36 +0000
From: Martine Newby Haspeslagh
To: PlanningPolicy@camden.gov.uk
Subject: Title No: NGL454800 Land East of Constable House

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

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Sirs,

I used to live in Eton College Road and really do believe that the site you have identified at the bottom of Eton College Road and the junction with Adelaide Road is not suitable as a possible gypsy and traveller site. The open area would quickly become an eye sore as at other traveller sites, with accompanying nuisance etc, while being located very close to several of the city's tourist attractions, which would reflect badly on Camden. A much better use for the land would be some rental accommodation for key workers, especially for those working in the Royal Free.

Sincerely

Martine Haspeslagh

[redacted address]

[REDACTED] [redacted postcode]

Responder 268

Date: Wed, 25 Jun 2025 11:03:53 +0100

From: John Prideaux

To: [redacted]

Subject: site C27 comment

I am writing with reference to 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).

Like many other local residents, I have only just become aware of this proposed change of use. I am writing to oppose the scheme. This is not an appropriate place for a campsite, nor is it a good use of council funds.

John Prideaux ([redacted postcode])

From:
To:
Subject:
Date:

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

PERSONAL DETAILS

Name: Dorothy Kisubi

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

This small space has great value for those of us living at Constable House, not just visually, but socially and practically. Several key concerns make this location unsuitable for such an allocation:

- **Footfall and exposure:** The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian corridors in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.
- **Loss of privacy for residents/future occupants:** The site is directly overlooked by numerous residential buildings, including Constable House (4–5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows.
- **Loss of green space:** This is one of the last small green areas in our immediate neighbourhood. Its removal would take away a calm, natural space in an already built-up and densely populated environment.
- **Community planting:** Over the last few months, fruit trees and wildflowers were planted here as part of the Community Trees project, supported by local

young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.

- **Playground space:** The site is used by children from Constable House and neighbouring homes as an informal but essential play area. There is no obvious alternative nearby. Removing this space would take away one of the few places where local children can safely play outdoors.
- **Access issues:** The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both residents and any future occupants of the site.
- **Flooding history:** The area has recently experienced repeated flooding, especially around the play area. Developing on this ground would risk further complications for both the site and surrounding buildings.
- **No clear planning for school places:** There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.
- **No Consultation:** There has been no meaningful consultation with local residents regarding the proposed use of this site.

Conclusion

- The establishment of such a site in proximity to residential areas often leads to increased tensions within the community, as it may foster perceptions of insecurity and disrupt the current social fabric. Furthermore, the potential for increased noise, litter and general disruption could adversely affect the quality of life for the residents in the surrounding areas.

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

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

Regards

Dorothy Kisubi

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Any views expressed by the sender of this message are not necessarily those of the Department

Responder 270

Date: Wed, 25 Jun 2025 11:14:07 +0100
From: Nicky Stewart
To: [redacted]
Subject: Proposed Gypsy/travellers site - Adelaide Road

We are writing to strongly object to a permanent site for Gypsy's and travellers as proposed in your planning policy.

This is a family area and we feel that there is more than enough leniency in diversification in social housing and other minority groups without making Camden the hippy area of London.

These groups due to their transient lifestyle will add no benefit to our community and we would be against any initiatives to allow a permanent camping site for them in this area.

Yours sincerely

Nicky Stewart

Responder 271

Date: Wed, 25 Jun 2025 10:37:37 +0000
From: Meg Lee Chin
To: Anna Burrage (Cllr), PlanningPolicy
Subject: Well done! I'm in favour of the proposals.

Im in favour of the proposed travellers' site next to Chalk Farm, which sounds fantastic. My wealthy landlord once said,

"If you want to get rich in property, buy in poor areas where the arty, gay, and lefty types go-they make it cool, and the prices follow."

But then of course, the corporations move in and the area soon loses its character. That's exactly what happened in Camden. In my view, those people reflect the true spirit of Camden far more than the corporate chains moving in.

Well done, Camden-finally heading back to your roots.

--
Meg Lee Chin -

[Redacted signature block]

Responder 272

From:
Cc:
Subject:
Date:

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.

Kind regards

Marco Pontin



Date: Wed, 25 Jun 2025 10:42:18 +0000

From: Tarquin McCalla

To: PlanningPolicy, [REDACTED]

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

Camden Local Plan Consultation Representation Form
Draft Plan Site Allocation Objection - Site C27 (Land Adjacent to Constable House, Adelaide Road)

1. Personal Details

Name: Tarquin McCalla

[REDACTED] [redacted postcode]

2. Agent Details (if applicable)

N/A - this representation is submitted personally

3. Which part of the Camden Local Plan are you commenting on?

Site Allocation Reference: Site C27 - Land Adjacent to Constable House, Adelaide Road

Relevant Document Section: Site Allocations - Draft Camden Local Plan

4. Do you support or object to this part of the Plan?

Support

Object

5. Please set out the reasons for your support or objection.

I strongly object to the inclusion of Site C27 (adjacent to Constable House, Adelaide Road) as a potential site for Traveller accommodation in the Draft Camden Local Plan.

As the owner and resident [REDACTED] building directly overlooking the proposed site, I have serious concerns about the suitability of this location. My objections are as follows:

A. Loss of Public Amenity and Open Space

The land forms part of the open green space associated with Constable House and surrounding estates. It serves as valuable amenity space in a high-density urban area and is frequently used by local families. Its redevelopment would be a significant loss to the community.

B. Local Green Space / Environmental Importance

The land is part of the Communi-Trees project, a joint initiative involving Camden Council, KOKO Foundation and Think & Do. The site includes fruit trees, wildflowers, and dozens of mature holly trees, planted and maintained by local youth (the "KOKO Foresters who are paid to plant and maintain the trees). These would be lost entirely under the proposal, in direct contradiction to Camden's policies on biodiversity and green infrastructure.

Although the Communi-Trees project budgets have not been made publicly available, typical costs for mature tree planting in London - including labour,

preparation, tree materials, and aftercare - can range from £1,000 to £3,000 per tree depending on size and location. Accordingly it is reasonable to assume a significant investment has already been made in this site.

C. Playground and Youth Provision

The site has historically been marked as a children's playground (as shown on OS Maps) and continues to be used as such. There are no comparable alternative play spaces in the immediate vicinity. The Draft Plan's own policies commit Camden to improving play space for children and young people - this proposal would do the opposite.

D. Overlooking and Residential Amenity

The site is overlooked on all sides:

- East: Constable House (4-5 storeys)
- North: Properties on Provost Road
- West: Eton Hall and The Etons (6 storeys, including my property)
- South: Bridge House and Primrose House

Adelaide Road itself is a busy thoroughfare and bus route. The location offers no privacy or suitable environment for residents of a Traveller site and would also create privacy issues for surrounding residents.

E. Flood Risk

The site lies within a flood risk zone and has recently experienced severe flooding across the play area. This is contrary to paragraph 13 of the Government's Planning Policy for Traveller Sites, which states:

"Local planning authorities should ensure that Traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: (g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans."

This legislation was drafted with the following considerations in mind:

i. Caravans and mobile homes are especially vulnerable

Unlike permanent housing, caravans and mobile structures are much more susceptible to flood damage. They lack the structural resilience to withstand flooding and pose a much higher risk to life and property.

ii. Evacuation and emergency access concerns

Traveller sites may not be equipped with permanent infrastructure. In flood-prone areas, **emergency access routes** can be cut off quickly, making it difficult to evacuate safely.

iii. Public health risks

Flooding can contaminate land and water supplies - posing particular health risks on sites where sanitation, waste disposal, or utilities may be limited.

iv. Sustainability objectives

Paragraph 13 overall promotes **social, environmental, and economic sustainability**. Developing in flood zones undermines these aims, especially if public funds are later needed for mitigation, clean-up, or relocation.

If a proposed Traveller site (like Site C27 in Camden) lies within a flood zone and has experienced recent flooding, it conflicts directly with this national policy guidance, which is a material planning consideration.

F. Lack of Access

There is no independent or dedicated access to the site. Any access would pass through the residential Constable House estate, which would be disruptive and unsafe. The proposed access is also directly opposite the entrance to Eton Place, creating traffic conflict.

G. Inadequate School and Infrastructure Planning

There is no evidence that infrastructure has been considered, including the availability of school places, GP services, or public facilities to support a Traveller site.

H. Misapplication of Site Selection Criteria

The constraints in Table 1 of the Gypsy and Traveller Site Identification Study appear not to have been properly applied. The site includes:

- Council-owned amenity land
 - Designated Local Green Space
 - Playground
 - Overlooked land
 - Areas lacking adequate access
-

I. Inconsistency with Draft Plan Policies

This proposal is inconsistent with the Camden Draft Plan's own stated aims, particularly:

- (i) Providing improved sport and leisure facilities for young people
 - (ii) Delivering new and enhanced areas of open/play space and access to nature
 - (iii) Enhancing greening and biodiversity
 - (iv) Supporting flood mitigation and SuDS strategies
-

J. Lack of Consultation

To date, there has been no meaningful consultation with local residents. Most residents in Constable House and Eton Hall are unaware of the proposal, in breach of Camden's own Statement of Community Involvement.

6. What changes would you like to see made?

I respectfully request that the Camden Draft Plan be modified by the removal of Site C27 as a proposed Traveller site. The site is wholly unsuitable for the reasons set out above.

This modification should include the removal of Site C27 from:

- Table 5 in Chapter 4 (Central Camden);
 - Policy H11 and supporting text in Chapter 7 (Meeting Housing Needs); and
 - the Draft Policies Map and Schedule of Proposed Site Allocations.
-

7. Do you wish to participate in the Examination in Public?

Yes

No

If yes, please briefly outline why:

I am directly affected as a neighbouring resident and property owner and would like to ensure local voices are heard in relation to this flawed site allocation.

8. Signature and Date

Signed: Tarquin McCalla

Date: 24th June 2025

Camden Local Plan Consultation Representation Form
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Tarquin McCalla



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-

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 - the Draft Policies Map and Schedule of Proposed Site Allocations.
-

7. Do you wish to participate in the Examination in Public?

Yes

No

If yes, please briefly outline why:

I am directly affected as a neighbouring resident and property owner and would like to ensure local voices are heard in relation to this flawed site allocation.

8. Signature and Date

Signed:



Date:

24th June 2025



Our ref: PL00795029

Planning Policy
London Borough of Camden
Camden Town Hall
Judd Street
London WC1H 8EQ

By email: planningpolicy@camden.gov.uk

27 March 2024

Dear Planning Policy Team

London Borough of Camden – Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Camden through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 196). Historic England has produced advice on this process which can be found here: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>

As with our response to the previous (Regulation 18) consultation, we note and very much welcome the emphasis on high-quality design in new development, together with appropriate consideration of existing context that runs through the consultation draft. We also note and welcome the various amendments that have been made to individual policies and site allocations as a result of comments and discussions that have taken place since the previous consultation. These include policies D2 and D5 and sensitive site allocations such as the Wendling Estate and St Pancras Hospital. As a result, our comments on the current draft are limited in nature and relate only to three draft site allocations. They are intended to add clarity to the site allocation policies and enable greater certainty for future decision-makers.

Allocation S18 – 135-149 Shaftesbury (the former Saville Theatre).

As with our previous consultation response, we support the identification of the listed building as a site allocation given the opportunity it provides to establish in the plan a clear framework for the conservation of its significance. We note the amendments introduced to the development and design principles in relation to the site allocation at clauses 1 and 6. However, we consider that the revised clause 6 in particular remains ambiguous and would potentially be problematic for a future decision-maker.

As currently set out, we consider that the reference to the height and massing of any proposed upwards extension implies that the effects of such an intervention would only be of relevance to the surrounding townscape and conservation areas. However, we consider that an upwards extension would clearly have the potential to harm the significance of the listed building, depending on its form and size. In order to be clear that this should be a consideration in any future decision (and notwithstanding the position with regard to the current application for the building), we consider clause 6 should be amended to:

~~‘ ensure that where an upwards extension is proposed, this is of the highest architectural quality to complement and enhance~~ **of a height, massing and architectural quality appropriate to the form and significance** of the Grade II host building, ~~is of a height and massing that is appropriate to~~ and responds to the site’s surrounding townscape and neighbouring conservation areas’.

Allocations C10 (Juniper Crescent Estate) and C11 (Network Rail land at Juniper Crescent).

We strongly welcome the strengthening of the wording within both site allocations in relation to managing any effects on the significance of the Grade II* Roundhouse. We note the text at the end of the development and design principle sections of each allocation to the Building Heights Study and its conclusion that development should be within the range of 9m-45m across the site. This is a reasonably broad range (although we would also note that 9m is not within the definition of a tall building in the draft local plan or the London Plan which is potentially confusing) and given some of the views testing we have seen the potential for effects on significance are clear. As a result we consider that further clarity as to how heights will be distributed across each site is necessary. The final sentence of these sections should be amended to

~~‘The acceptability of particular tall building proposals, and their location within the site,~~ **will need to take appropriate account of and respect the significance of the Roundhouse and should be located accordingly.** They will be assessed against Policy D2 (Tall Buildings) and other relevant development plan policies.



I trust these comments are helpful, and I would be pleased to discuss further to clarify the points raised. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

Tim Brennan [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

To: Camden Council Planning Policy Team

Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025) – Objection to Site C27 Allocation

Dear Sir/Madam,

I write on behalf of the New Etons Residents Association (NERA), representing residents of Eton Hall, Eton Place, and Eton Rise, located directly opposite the proposed Site C27 (Land East of Constable House, Adelaide Road, NW3 3QA). We strongly object to the allocation of this site for Gypsy and Traveller accommodation in the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). We respectfully request the Planning Inspector recommends removal of Site C27 from the Plan on the grounds that it is unsound and fails the key tests of justification, effectiveness, and consistency with national and local policy.

1. Loss of Valued Community Amenity Space

Site C27 serves as a much-valued green space for residents, historically used as a play area and community amenity, managed under the “Communi-trees” initiative. It meets the criteria for Local Green Space due to its vital role for families, children, and elderly residents in this dense urban area lacking private outdoor space. Its development would result in an unacceptable loss of accessible green space, contrary to the National Planning Policy Framework (NPPF), London Plan policies, Camden’s own local plan, and relevant case law:

- 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 site is hemmed in by multi-storey residential blocks, including Constable House various large scale developments, including the Etons, Bridge House opposite and the new development at site C25. The site is heavily overlooked from all sides, undermining mutual privacy and residential amenity. This conflicts with Camden’s Planning Guidance on Amenity, the Planning Policy for Traveller Sites (PPTS), and fundamental human rights protections.

- 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 lies within a flood risk zone, identified as vulnerable to surface water flooding. Traveller accommodation is classified as a “Highly Vulnerable Use,” making this location unsuitable under both the NPPF and PPTS flood risk policies. The proposal fails critical sequential and exception tests required for flood-prone areas.

- 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 Deliverability

Access to the site is through narrow estate roads and pedestrian paths, inadequate for caravans, trailers, or emergency vehicles. The lack of independent, safe vehicular access raises serious concerns about the practical deliverability of the site and compliance with 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 Council's selection of Site C27 appears arbitrary and non-transparent. It was not disclosed in earlier consultation stages, denying residents meaningful participation. The site's inclusion contradicts the filters and exclusion criteria applied in the original Gypsy and Traveller Site Identification Study (GTSIS), which should have ruled out locations with overlooking, flood risk, access issues, and use as amenity/play space.

6. Conflict with GTSIS Methodology and Exclusion Criteria

Site C27 directly conflicts with key exclusion criteria in AECOM's methodology for GTSIS, including proximity to multi-storey buildings, its current use as amenity/play space, flood risk, and inadequate access. Its inclusion undermines the evidence base and planning soundness of the Local Plan.

7. Better Alternatives Exist

There has been no clear justification why 19 other shortlisted sites were rejected in favour of Site C27. The absence of a robust, transparent comparative analysis or scoring undermines the Plan's soundness in line with the NPPF's requirement for justification, effectiveness, and consistency.

Conclusion:

For the reasons outlined above — including the loss of vital amenity space, privacy concerns, flood risk, access constraints, procedural flaws, and safety implications — Site C27 should be removed from the Camden Local Plan submission draft. We urge the Council and Planning Inspectorate to reconsider this allocation and pursue a more transparent, evidence-based, and community-informed approach to identifying suitable sites for Gypsy and Traveller accommodation.

Thank you for considering our representation. We request to be heard at the examination hearings.

Yours sincerely,

Leonie Perrin

On behalf of New Etons Residents Association (NERA)

Re: Representation on Camden Local Plan (Proposed Submission) – Traveller site on Chalk Farm Road
Dear Planning Policy Team,

I write to formally object to the allocation of a permanent Traveller site on or near Chalk Farm Road in the Camden Local Plan Proposed Submission.

My objection is grounded in the following **material planning reasons**, based on Camden's own policy framework and national guidance:

1 Highway Safety & Transport Congestion

Policy T6 requires robust Transport Assessments and adequate servicing arrangements. Chalk Farm Road is a busy town centre shopping street, heavily used by TfL buses, cyclists, and pedestrians. Introducing caravan movements, servicing vehicles, and visitor traffic would exacerbate congestion, reduce visibility for vulnerable users, and heighten collision risk. The draft plan states any proposal must "avoid shortfall to existing on street parking conditions" this site would likely worsen an already overloaded parking regime.

2 Impact on Character, Heritage & Visual Amenity

Chalk Farm sits within a conservation-sensitive townscape. Camden's policies (DP 24, DP 25 CS 14) insist new development must preserve heritage and visual character. The introduction of a static caravan park contravenes the established character of the high street frontages, does not "respond to the area's historic context," and would harm the lively retail environment, as emphasized in the Camden Goods Yard guidelines.

3. Lack of Open Space & Community Facilities

The Local Plan stresses the importance of protecting open space to support biodiversity and well-being (CS 15 DP3 1). A proposed site at Chalk Farm would put further pressure on already-stretched parks and public space. Moreover, it lacks allocation of community facilities, playgrounds or green buffers that could mitigate impact, constituting conflict with policy DP3 1 and CS 15

4. Flood Risk & Sustainable Drainage

Chalk Farm Road lies in a mixed flood-risk catchment area. Camden's climate policies (CS 13, DP 22) require sustainable drainage strategies. The Local Plan does not present evidence of Flood Risk Assessments or drainage solutions for a caravan site, leaving residents and neighbours vulnerable to increased surface water run-off, particularly during London's increasingly intense rainstorms.

5 Contravention of Traveller Site Policy Requirements

Camden's identification study (2024) excluded several council-owned sites due to unsuitability, and states allocation must align with DP3, DP 14, DP 15 DP 24 and national Circular 01/2006. The Chalk Farm site is poorly integrated into community services, lacks safe walking/cycling connections, and fails to meet essential criteria like school access, GP links, or suitable transport links required by DP 14 and DP 15

6. Precedents Demonstrating Similar Grounds

- In Kettering (2023), an inspector dismissed unmet pitch demand because of "significant harm" to rural character.
- In Norfolk (2025) and Foston, SK (2024), applications were rejected due to scale, lack of local services, and highway safety.

These cases reinforce the principle that Traveller accommodation must not override material planning considerations

Summary & Recommendation

For the reasons above, allocating a permanent Traveller site on Chalk Farm Road is **unsound** and inconsistent with Camden's own policies:

Issue	Policy Conflict
Traffic & parking overload	DP20, T6, DP24
Visual and heritage damage	CS14, DP24, DP25
Lack of open space	CS15, DP31
Absence of flood strategy	CS13, DP22
Poor integration & access	DP3, DP14, DP15, national Circular

I urge the council to **remove this allocation** unless a detailed site-specific assessment (including transport, flood risk, servicing, drainage, open space and heritage impact) is submitted and concluded to be compliant with all relevant policies. Alternative sites with fewer constraints (e.g. existing council-owned land more proximate to services) should be prioritised.

I trust that this representation will be fully considered in the final Plan. I would also request notification of any future public hearing sessions related to this issue.

Yours sincerely,
Annie Mills

Responder 277

Date: Wed, 25 Jun 2025 12:04:21 +0100
From: Anna Foden
To: [redacted], [redacted], [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 Anna Foden and I live at [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 multi storey 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,

Anna Foden

Responder 278

Date: Wed, 25 Jun 2025 13:13:57 +0200
From: Mui Sebold
To: [redacted], [redacted], [redacted], [redacted]
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 Mui Sebold and I have a property ([redacted address], NW1) 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
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- 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,

Mui Sebold

Sent from my iPhone

Date: Wed, 25 Jun 2025 12:13:22 +0100
From: J Stapleton
To: [redacted], [redacted], [redacted], [redacted], [redacted] (3rd Mailbox)
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) objection

To: Camden Council Planning Policy Team

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

My name is Julie Stapleton and I own [redacted] London [redacted postcode], which is located directly opposite the proposed site. Myself and many of my fellow residents 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).

While residents 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 address] 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.camdencitizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites>)

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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Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

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- 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.

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.

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.

Kind regards

Julie Stapleton

From: [\[REDACTED\]](#)
To: [Anna Burrage \(Cllr\): Planning Policy](#)
Subject: 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). Policy H11, pages 294-5
Date: 25 June 2025 12:34:38
Attachments: [image644949.png](#)

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Dear Madam/Sir,

Re: 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). Policy H11, pages 294-5

I do not believe that the Camden Local Plan Proposed Submission Draft in respect of the above land is sound.

In particular, I write (as a local resident directly affected by the Proposed Submission Draft) 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).

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 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.

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

Do kindly let me know if you require any further information.

Please could you also add my name to your consultation database so that I can be notified of (i) when the Camden Local Plan has been submitted; (ii) when the Inspector's Report is published; and (iii) when the Camden Local Plan is adopted.

Yours faithfully,

Robert Anderson KC

██████████

Date: Wed, 25 Jun 2025 12:35:21 +0100
From: Milli C
To: [redacted], [redacted], [redacted], [redacted]
Subject: Objection to Site Allocation C27 (Gypsy And Traveller Site)

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

My name is Milli Chu and I live on [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,
Milli Chu

Responder 282

Date: Wed, 25 Jun 2025 12:39:15 +0100

From: Julie Lasso

To: [redacted]

Subject: Objection to proposal for a Gypsy and Traveller accommodation -
recommendation to Delete Site Allocation C27: Land Adjacent to Constable House
Adelaide Road

I want to register my objection to this proposal

Responder 283

Date: Wed, 25 Jun 2025 11:52:08 +0000
From: Fiona Paulus
To: PlanningPolicy
Subject: Planning for Site Allocation C27

Part B – Please use a separate page for each representation

Name or Organisation: Adelaide Road Tenants Association

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

Documents can be found at the following links:

- Camden Local Plan Proposed Submission Draft – Draft new Local Plan - Camden Council
- Draft Policy Map - Draft new Local Plan - Camden Council

Paragraph Policy Policies Map

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

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

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

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

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

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

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

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

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

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

I object to the soundness of the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). We ask that this representation be considered as part of the Regulation 19 consultation and respectfully request that the Planning Inspector recommend the site's removal from the Local Plan on the grounds of unsoundness, as it fails the tests of justification, effectiveness, and consistency with national policy as set out in NPPF paragraph 35.

1. Loss of Functional Amenity Space Used by Residents

While not formally designated as open space or a play area, the site is actively used by local residents and children as informal play and communal space. This site is directly adjacent to Constable House and is particularly accessible and visible to its residents. It supports incidental play, passive recreation, and social use, especially for families living in high-density accommodation.

Its redevelopment would reduce the quality and variety of local amenity provision, contrary to:

- NPPF Paragraphs 99-101;
- Camden Local Plan Policy A2(e);
- London Plan Policy S4;

This is reinforced by the case *Copas v Royal Borough of Windsor and Maidenhead* [2001] EWHC Admin 548, confirming that informal, community-used land requires policy-compliant justification before its loss.

2. Overlooking and Harm to Privacy - Amenity Impact

The site is immediately and heavily overlooked by the multi-storey residential blocks of Constable House and adjacent buildings. The resulting conditions would undermine privacy for both existing residents and potential site occupants.

This contravenes:

- Camden Planning Guidance on Amenity;
- PPTS (2023), para. 13(c);
- Article 8 of the ECHR.

Supported by *Moore v SSCLG* [2013] EWCA Civ 1194.

3. Flood Risk - Inappropriate for Highly Vulnerable Use

The site lies within a Local Flood Risk Zone. Traveller accommodation is considered a "highly vulnerable" use under Planning Practice Guidance.

Contrary to:

- NPPF Paragraph 167;

- PPTS para. 13(g).

See APP/B5480/A/11/2151483 (Romford) for precedent.

(Continue on a separate sheet if necessary)

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

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

The proposed allocation is unsound and the plan should be modified by removing it from the plan on the basis of:

- Loss of valued amenity space;
- Overlooking and privacy conflicts;

- Unacceptable flood risk.

(Continue on a separate sheet if necessary)

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

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

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

No

Yes

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

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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.

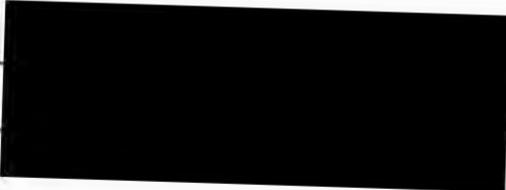
(a) when the Camden Local Plan has been submitted	Yes
(b) when the Inspector's Report is published	Yes
(c) when the Camden Local Plan is adopted	Yes

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:	<u>25/6/25</u>
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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.

Date: Wed, 25 Jun 2025 11:53:32 +0000
From: Jon Sveinbjorn Halldorsson
To: PlanningPolicy
Subject: Camden Local Plan: Objections to Site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)

Name: Jón Sveinbjörn Halldórsson

[redacted]

[redacted]

[redacted] [redacted email]

OUTLINE OF OBJECTION/REPRESENTATION

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

Dear Camden Council Policy Planning Team:

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

This small space has great value for those of us living nearby, not just visually, but socially and practically. Several key concerns make this location unsuitable for such an allocation:

- **Footfall and exposure:** The plot is right next to Chalk Farm station and sits along the busy walking route to Primrose Hill, one of the most heavily used pedestrian corridors in the area. It's already a high-traffic zone, with very little calm or protection from noise and movement.
- **Loss of privacy for residents/future occupants:** The site is directly overlooked by numerous residential buildings, including Constable House (4-5 storeys), the Etons (6 storeys), Provost Road houses, Primrose House, Bridge House, and the new block on Haverstock Hill. The location offers no seclusion or quiet. Any families placed here would live in full view of hundreds of windows, next to a busy road, a railway line, and a major pedestrian route. It would not provide a safe, private or dignified living space.
- **Loss of green space:** 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.
- **Community planting:** Over the last few months, fruit trees and wildflowers were planted here as part of the CommuniTrees project, supported by local young people. The proposed site would wipe out this initiative entirely, which feels like a step backwards for community life and local engagement.

- **Playground space:** The site is used by children from Constable House and neighboring homes as an informal but essential play area. There is no obvious alternative nearby. Removing this space would take away one of the few places where local children can safely play outdoors.
- **Access issues:** The proposed access to the site would be directly opposite to buildings, raising serious concerns about traffic flow and disruption for both residents and any future occupants of the site. The plot is hemmed in by narrow roads and pedestrian areas, with limited turning space-posing challenges for critical emergency service vehicles.
- **Flooding history:** The area has recently experienced repeated flooding, especially around the play area. Developing this ground would risk further complications for both the site and surrounding buildings.
- **No clear planning for school places:** There is no information indicating whether any consideration has been given to nearby school capacity or access to essential local services.
- **No Consultation:** There has been no meaningful consultation with local residents regarding the proposed use of this site.

Conclusion

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

Thank you for your time and consideration,

Jón Sveinbjörn Halldórsson

Responder 285

Date: Wed, 25 Jun 2025 14:00:05 +0200
From: Judy Dobias
To: [redacted]
Subject: Travellers / Gypsy location - Chalk Farm

I live at [redacted address] [redacted postcode] and am currently [redacted] today.

A neighbour shared the information about this proposal which many of us knew nothing about.

I strong object to this happening and believe it would throw the equilibrium of the neighbourhood.

Best wishes,
Judy Dobias

Judy Dobias

Responder 286

Date: Wed, 25 Jun 2025 12:11:59 +0000
From: Emily Mitchell
To: PlanningPolicy
Subject: Gypsy site

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

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Good morning
Please add my name to the no doubt enormous list of those who do not want this site off Adelaide Rd or anywhere in the area.
Thanks
Emily Mitchell
Sent from my iPhone

Responder 287

From: .
To: [PlanningPolicy](#)
Subject: Site C27
Date: 25 June 2025 13:28:00

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

[EXTERNAL EMAIL] Beware -- This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

I have just been made aware of the plans to put a travellers site on Adelaide Road. Given the short time until the deadline, I am emailing to object to the plans. It seems wholly inappropriate on multiple levels. It is a very residential area, right next to a block of flats. It is a very small but much valued green space for the residents of Constable House. It houses a childrens' playground which is used by many. It also feels like it would be a very vulnerable site for the travellers themselves - noisy, very publicly overlooked, exposed and polluted. It is also right next to a railway. For all these reasons, I would like to object please. Many thanks, Kate Hulme.

Part B – Please use a separate page for each representation

Name or Organisation: Bridget Fox, Woodland Trust
--

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

Documents can be found at the following links:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="A3"/>	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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

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

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

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

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

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

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

<p>We welcome the addition from the Reg 18 consultation of reference to protecting the natural environment in point A and to maximising the use of green infrastructure and nature-based solutions in point A3.</p> <p>This is in line with NPPF para 199: “Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.”</p> <p style="text-align: right;">(Continue on a separate sheet if necessary)</p>
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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.

n/a

(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:

n/a

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

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11. Signature:		Date:	25/6/2025
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Part B – Please use a separate page for each representation

Name or Organisation: Bridget Fox, Woodland Trust
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Paragraph	<input type="text"/>	Policy	<input type="text" value="CC11"/>	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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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<p>We welcome the inclusion of reference in C1 that SUDS should be designed to provide multifunctional benefits, maximise urban greening and be integrated into the development.</p> <p>This is in line with NPPF para 164a: supporting “suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems”.</p> <p style="text-align: right;"><small>(Continue on a separate sheet if necessary)</small></p>

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.

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Paragraph	<input type="text"/>	Policy	<input type="text" value="DS1"/>	Policies Map	<input type="text"/>
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<p>We welcome the wording in A9 on maximising opportunities for enhancing biodiversity, improving access to nature, tree provision, urban hedgerows and community food growing.</p> <p>This is in line with NPPF para 136: “Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.”</p> <p style="text-align: right;">(Continue on a separate sheet if necessary)</p>

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.

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Part B – Please use a separate page for each representation

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Paragraph	<input type="text"/>	Policy	<input type="text" value="NE1"/>	Policies Map	<input type="text"/>
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<p>We welcome the addition from the Reg 18 consultation of a specific reference to ancient and veteran trees in NE1 A3.</p> <p>This is in line with NPPF para 193c: “c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.”</p> <p style="text-align: right;">(Continue on a separate sheet if necessary)</p>

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Paragraph	<input type="text"/>	Policy	<input type="text" value="NE3"/>	Policies Map	<input type="text"/>
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<p>We strongly welcome this robust policy for woods and trees, with requirements to protect existing trees and secure additional tree planting in the borough.</p> <p>In particular, we support:</p> <p>Point A3 requiring applicants to undertake tree surveys, arboricultural impact assessments and the recording of ancient and veteran trees. Recording ancient & veteran trees is a necessary first step to their protection. This is in line with NPPF para 193c: "c) development resulting in the loss or deterioration of</p>
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irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.”

Point A6 on tree replacement, setting a benchmark of planting two new trees for each one lost.

Point A8 requiring developments to incorporate additional trees and vegetation wherever possible, and especially in areas of low tree cover.

These measures will contribute to meeting requirements for biodiversity net gain in line with NPPF para 192b) and is also in line with NPPF para 136 encouraging provision of trees in new developments. Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

(Continue on a separate sheet if necessary)

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Paragraph Policy Policies Map

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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.

We welcome the preference in point De) for native and priority species in new or enhanced public space. This is important for biosecurity and biodiversity and is line with NPPF para 187d) "incorporating features which support priority or threatened species" and NPPF para 192b) "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

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Local Nature Recovery Strategies (LNRS) are a statutory requirement in the Environment Act 2021 (the duty in London rests with the GLA as the responsible authority). Government guidance on LNRS (March 2023) says: "8. The government intends for local nature recovery strategies to inform the local planning process. Local planning authorities must have regard to them in complying with the strengthened biodiversity duty."

The draft Camden Local Plan does make reference to LNRS in narrative paragraphs 11.26 and 11.31 but there is no reference to LNRS in any of the policies. Policy NE2 would seem to be the best place to remedy this omission.

(Continue on a separate sheet if necessary)

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We suggest adding wording to Policy NE2 Point A4

*4. expect development to realise benefits for biodiversity through their layout, design, and use of materials, taking into account the local ecological context and any opportunities for biodiversity gains identified in **Local Nature Recovery Strategies**, Local Plan site allocations and neighbourhood plans, including the provision of green roofs.*

This would meet the requirements to 'have regard to' the LNRS and would better reflect NPPF para 192 on safeguarding "areas identified by national and local partnerships for habitat management, enhancement, restoration or creation".

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11. Signature:		Date:	25/6/2025
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Part B – Please use a separate page for each representation

Name or Organisation: **Bridget Fox, Woodland Trust**

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:

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

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

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

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

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

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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.

At Reg 18 consultation, we asked for the addition of wording seeking to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3.

We strongly welcome the addition of point 11 “seek to retain existing trees where possible.” This is in line with NPPF para 136, “that existing trees are retained wherever possible”.

(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.

n/a

(Continue on a separate sheet if necessary)

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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:

n/a

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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

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11. Signature:		Date:	25/6/2025
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Part B – Please use a separate page for each representation

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Paragraph

Policy

C15

Policies Map

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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At Reg 18 consultation, we asked for the addition of wording to better reflect the Community Vision for a healthier, greener, more sustainable, and more accessible neighbourhood, and to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3.

We strongly welcome the addition of point 9 “seek to retain existing trees where possible.” This is in line with NPPF para 136, “that existing trees are retained wherever possible”.

(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.

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n/a
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Yes

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Part B – Please use a separate page for each representation

Name or Organisation: ██████████ Woodland Trust

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

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

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(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input type="text"/>
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(4) Consistent with national policy	<input type="text"/>

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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.

We welcome the addition from the Reg 18 consultation of reference to protecting the natural environment in point A and to maximising the use of green infrastructure and nature-based solutions in point A3.

This is in line with NPPF para 199: “Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.”

(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.

n/a

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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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(a) when the Camden Local Plan has been submitted	X
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Part B – Please use a separate page for each representation

Name or Organisation:	 Woodland Trust
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Paragraph	<input type="text"/>	Policy	<input type="text" value="CC11"/>	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 type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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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"/>
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<p>We welcome the inclusion of reference in C1 that SUDS should be designed to provide multifunctional benefits, maximise urban greening and be integrated into the development.</p> <p>This is in line with NPPF para 164a: supporting “suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems”.</p> <p style="text-align: right;"><small>(Continue on a separate sheet if necessary)</small></p>

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.

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No

Yes

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Part B – Please use a separate page for each representation

Name or Organisation:  Woodland Trust

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Paragraph	<input type="text"/>	Policy	<input type="text" value="DS1"/>	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 type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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

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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.

We welcome the wording in A9 on maximising opportunities for enhancing biodiversity, improving access to nature, tree provision, urban hedgerows and community food growing.

This is in line with NPPF para 136: “Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.”

(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.

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No

Yes

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Paragraph	<input type="text"/>	Policy	<input type="text" value="NE1"/>	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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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<p>We welcome the addition from the Reg 18 consultation of a specific reference to ancient and veteran trees in NE1 A3.</p> <p>This is in line with NPPF para 193c: “c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.”</p> <p style="text-align: right;"><i>(Continue on a separate sheet if necessary)</i></p>
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Part B – Please use a separate page for each representation

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Paragraph	<input type="text"/>	Policy	<input type="text" value="NE3"/>	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 type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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<p>We strongly welcome this robust policy for woods and trees, with requirements to protect existing trees and secure additional tree planting in the borough.</p> <p>In particular, we support:</p> <p>Point A3 requiring applicants to undertake tree surveys, arboricultural impact assessments and the recording of ancient and veteran trees. Recording ancient & veteran trees is a necessary first step to their protection. This is in line with NPPF para 193c: “c) development resulting in the loss or deterioration of</p>
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irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.”

Point A6 on tree replacement, setting a benchmark of planting two new trees for each one lost.

Point A8 requiring developments to incorporate additional trees and vegetation wherever possible, and especially in areas of low tree cover.

These measures will contribute to meeting requirements for biodiversity net gain in line with NPPF para 192b) and is also in line with NPPF para 136 encouraging provision of trees in new developments. Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

(Continue on a separate sheet if necessary)

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Part B – Please use a separate page for each representation

Name or Organisation:	 Woodland Trust
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Paragraph	<input type="text"/>	Policy	<input type="text" value="SC4"/>	Policies Map	<input type="text"/>
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We welcome the preference in point De) for native and priority species in new or enhanced public space. This is important for biosecurity and biodiversity and is line with NPPF para 187d) "incorporating features which support priority or threatened species" and NPPF para 192b) "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

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Paragraph Policy Policies Map

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Local Nature Recovery Strategies (LNRS) are a statutory requirement in the Environment Act 2021 (the duty in London rests with the GLA as the responsible authority). Government guidance on LNRS (March 2023) says: "8. The government intends for local nature recovery strategies to inform the local planning process. Local planning authorities must have regard to them in complying with the strengthened biodiversity duty."

The draft Camden Local Plan does make reference to LNRS in narrative paragraphs 11.26 and 11.31 but there is no reference to LNRS in any of the policies. Policy NE2 would seem to be the best place to remedy this omission.

(Continue on a separate sheet if necessary)

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We suggest adding wording to Policy NE2 Point A4

*4. expect development to realise benefits for biodiversity through their layout, design, and use of materials, taking into account the local ecological context and any opportunities for biodiversity gains identified in **Local Nature Recovery Strategies**, Local Plan site allocations and neighbourhood plans, including the provision of green roofs.*

This would meet the requirements to 'have regard to' the LNRS and would better reflect NPPF para 192 on safeguarding "areas identified by national and local partnerships for habitat management, enhancement, restoration or creation".

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At Reg 18 consultation, we asked for the addition of wording seeking to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3.

We strongly welcome the addition of point 11 “seek to retain existing trees where possible.” This is in line with NPPF para 136, “that existing trees are retained wherever possible”.

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At Reg 18 consultation, we asked for the addition of wording to better reflect the Community Vision for a healthier, greener, more sustainable, and more accessible neighbourhood, and to maximise the retention of existing trees and greenspace, integrating these into the estate design, in line with policies DS1 and NE3.

We strongly welcome the addition of point 9 “seek to retain existing trees where possible.” This is in line with NPPF para 136, “that existing trees are retained wherever possible”.

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Responder 289

Date: Wed, 25 Jun 2025 12:33:00 +0000
From: Jeremy Bradshaw
To: PlanningPolicy
Subject: Camden Nature Corridor/Camden Local Plan Policy N1 para 7

I'm writing to support the Council's Local Plan with clear guidance for the future development of Murphy's Yard, Regis Road and the West Kentish Town Estate and in particular that these developments should bring about the delivery of the community-led Camden Nature Corridor for those areas.

Trees, plants and wildlife bring benefits to all of those of us living in Camden's built up urban environments. They improve our health. Do please encourage them by ensuring that the developments mentioned above include ample green spaces for wildlife.

Thank you!

Best wishes,

Jeremy Bradshaw

[redacted address], [redacted] [redacted postcode]

Date: Wed, 25 Jun 2025 12:32:54 +0000
From: Afza Zaki
To: PlanningPolicy, [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 Dr Afza Zaki and I live in the [REDACTED] area 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,

Dr Afza Zaki

Responder 291

From: [REDACTED]
To: [REDACTED]
Cc:
Subject: Fwd: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) Of Draft Local Plan
Date: 25 June 2025 13:37:59

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

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

We submit this representation as a leasehold owner of [REDACTED] – 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.

Andrew Dalah

Responder 292

Date: Wed, 25 Jun 2025 12:40:16 +0000
From: Ngaia FITZHARDINGE
To: PlanningPolicy
Subject: Objection to proposed use of Site C27: Chalk Farm- Gypsy and Traveller accommodation site

Dear Planning Officer,

Respectfully, I object strongly to the proposal above.

The site is not suitable for housing disadvantaged or minority groups.

- It is situated on a noisy, busy road on the Ambulance route to the local hospitals.
- It is exposed on two of its three sides, so it does not provide a secure location, particularly for caravans.
- It is situated on a very public thoroughfare, running from Chalk Farm Tube to Primrose Hill, where most residents pass by twice daily, and the high number of visitors to the area often pass by this site on foot, many returning late at night.
- It has poor drainage, and no facilities.

Furthermore, there is a loss of one of the few green spaces in this part of the Chalk Farm area, which will have a negative impact on residents in the surrounding high-density areas. This area is a long-established green space for Constable House residents, with many children from the nearby flats using it.

Finally, the small notices on a few poles meant most residents only found out yesterday or today. Placing them in libraries and planning offices is irrelevant for most residents. Many will be completely unaware.

There is no transparency on site selection. This site is wholly unsuitable, and the community should have been involved much earlier to avoid the waste of money in proposing this one.

Sincerely,

Ngaia Fitzhardinge
[redacted address]

[redacted]

[redacted]

Responder 293

Date: Wed, 25 Jun 2025 13:02:53 +0000
From: Kate Waites
To: PlanningPolicy
Subject: Gypsy/Traveller Site Planned Next to Chalk Farm Tube - Comments closing 27th June 2025

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

Beware - This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Camden

[redacted]

Kate Waites
[redacted address]
[redacted]
[redacted postcode]

Responder 294

Date: Wed, 25 Jun 2025 13:06:39 +0000

From: Nancy Hawker

To: PlanningPolicy

Subject: Representation to the consultation on the new Camden Local Plan

Congratulations on completing all the work that went into the new local plan.

Please find in attachment the representation to the public consultation on Camden's local plan submitted by London Gypsies and Travellers on the basis of engagement with local community members and our expertise.

Yours,

Nancy

Dr Nancy Hawker

Policy and Research Officer

[Redacted signature block]

[Redacted signature block]

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Dr"/>	<input type="text"/>
First Name	<input type="text" value="Nancy"/>	<input type="text"/>
Last Name	<input type="text" value="Hawker"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<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: London Gypsies and Travellers

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"/>	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"/>
(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.

There are positive and negative developments with regards to Policy H11 “Accommodation for Travellers” in the new Camden Local Plan compared to the 2017 Local Plan and the draft that was submitted to Reg 18 consultation. The most significant regression is the lack of target numbers for pitches and a timeframe for delivery.

The most significant improvement is the allocation of two parcels of land suitable and deliverable for two Gypsy or Traveller sites in Camden.

Feedback from Gypsy and Traveller residents of Camden support these allocations with the following comments:

1) Land east of Constable House, NW3 3QA

This is a good size and the area is known to Travellers and even though it is overlooked by a residential block, that's not necessarily a problem if there is screening. It's quite exposed on the corner with Adelaide Road, unless all the green hedges stay in place. Overlooking is not a categorical problem. Rather, the problem depends on the immediate surroundings and the mitigations. Trees that grow upwards are good for privacy and screening but there are different kinds of trees. The ones with wide canopies and sparse branches that fall on caravan roofs in storms are not good. But the ones that grow upwards (like cypress) would be good.

As it is more than 450 sq m, the site will accommodate three pitches to a very good standard.

2) Land off Freight Lane, N1C 4BE

This could also be an excellent five-pitch site for which we would like to see designs, especially if the train noise from the Eurostar could be blocked. We are used to the noise of Camden, including the trains. However it is better if there are sound barriers. At the same time, concrete walls feel like a prison if they are from more than one side. If it's a nice area with a five-pitch site with trees, a bit tucked away from other residents, that would be a very good site with plenty of space.

Based on the wishes of community members, London Gypsies and Travellers **supports** Camden's Policy H11 with regards to clauses B and C.

London Gypsies and Travellers regrets that the input that our organization provided on 13 March 2024 to the previous draft of the Camden Local Plan has not been incorporated into the current wording. Our main concerns continue to revolve around the necessity of early and effective engagement of Gypsies and Travellers in consultations about the policies that affect them, and the lack of reference to the London Plan Policy H14. Additionally, in light of national policy developments since March 2024, we note changes in the NPPF that favour a five-year supply of deliverable Gypsy and Traveller pitches when considering changes to MOL designations.

Finally, we would like to request that all references to Gypsies and Travellers consistently use capital initial letters, because these names refer to ethnic groups (which are protected from discrimination by the Human Rights Act and the Equality Act).

(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.

Chapter 7 para 7.356 contains errors and confusion in the summarising of the definition of Gypsies and Travellers in current legislation. Gypsies and travellers [sic] are not “other persons of nomadic habit of life whatever their race or origin”. Being a Gypsy or a Traveller is their race and origin. London Gypsies and Travellers suggests quoting the following definition and explanation (emphasis added):

Gypsies and Travellers means:

- (a) Persons of a nomadic habit of life, whatever their race or origin, including –
 - (i) Persons who, on grounds only of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently, and
 - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such); and
- (b) All other persons with a cultural tradition of nomadism or of living in a mobile home.

The intention of the above definition is to ensure that ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers. Welsh Government, Circular 005/2018, June 2018,

<https://www.gov.wales/sites/default/files/publications/2019-05/planning-for-gypsy-traveller-and-showpeople-sites-wgc-0052018.pdf>

Under **Policy H11, clause A**: Reinstate the wording **on the target of 16 pitches by 2031** based on the accommodation needs identified in the 2014 Camden GTANA. This evidence continues to be the most up-to-date assessment of need. Targets will be revised regularly in line with reviews of the Local Plan. Defined targets and timeframes are needed to monitor progress.

Policy H11, clause B commits to protecting existing Traveller sites in Camden, which is welcome. Additionally, London Gypsies and Travellers suggests that in order to comply with **London Plan Policy H14 D and E** there should be explicit commitment under Camden Policy H11 clause B to conduct an **audit of existing sites** managed by Camden Council, to identify issues such as overcrowding and disrepair, and plan to address these issues. Funding is available from the GLA Affordable Homes Programme for refurbishment of existing sites, and for the delivery of new sites.

London Gypsies and Travellers’ experience, and the experience of local authorities, is that well-managed and well-designed sites are better integrated into their neighbourhoods and enhance community relations. (Good management includes a Pitch Allocation Policy which is currently lacking in Camden.) **Under Policy H11, clause D**, add the following points as subclauses 9. and 10. to reflect **inclusive and good design practices**, as laid out in the national advisory guidance in 2021 (see

<https://www.broadlandgroup.org/wp-content/uploads/2021/02/Gypsy-and-Traveller-Guide.pdf>):

- 9. Include an appropriately detailed management plan; and

10. Demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy and Traveller communities.

In light of the health inequalities experienced by Gypsies and Travellers (see <https://www.nhs.uk/wp-content/uploads/2023/05/Inequalities-in-mental-health-care-for-Gypsy-Roma-and-Traveller-communities.pdf> and statistics provided by the ONS <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsyorishtravellerpopulationsenglandandwales/census2021#general-health-and-unpaid-care>), London Gypsies and Travellers are asking **for adjustments for disabled access** to be made across all housing types including Gypsy and Traveller pitches. Under Policy H11, clause D, add another point about accessible design:

11. In the interest of accessibility and inclusivity, the Camden's Local Plan should apply a clear definition of accessibility to planning for affordable housing in general and social rented housing in particular, of which Gypsy and Traveller pitches are one type, to address mobility impairments as well as sensory impairments and neurodivergence, as recommended by the BSI standard Design for the Mind - Neurodiversity and the Built Environment (PAS 6463).

(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:

London Gypsies and Travellers (LGT) is a charity which challenges social exclusion and discrimination, working for change in partnership with Gypsies and Travellers. LGT works with the communities and a range of trusted partners to contribute to the development of local, regional and national policy.

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:	Nancy Hawker	Date:	25 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 295

Date: Wed, 25 Jun 2025 13:15:53 +0000
From: Donna Baillie
To: PlanningPolicy
Subject: Representation on Policy H11 of the Local Plan

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

Part B – Please use a separate page for each representation

Name or Organisation: ██████████

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

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

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

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

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

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

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

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

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

The two sites proposed as new sites for Gypsies and Travellers appear to meet the legal requirements, but it would be good to see a detailed report on why the other proposed sites were not considered appropriate. Camden has recognised the need for 16 new sites, and while the two that have made it through the process are very welcome, they will not be able to meet the requirement for anywhere near the number of pitches needed.

I am aware that some people near the Adelaide Road/Constable House site are very fearful of how the establishment of a site will affect their neighbourhood. I believe this is based on false information and pejorative stereotypes. I used to live near the Carol Street site in Camden Town, and do not remember there ever being any trouble associated with the site. I was glad to read that Camden is aware of the need to create positive opportunities for members of the established local communities and the residents of the new sites to meet and interact. I think this is necessary, and, if handled well, should go a great way towards better understanding between neighbouring groups.

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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

No

Yes

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

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

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

(a) when the Camden Local Plan has been submitted	
(b) when the Inspector's Report is published	x
(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:	25.06.25
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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.

From:
To:
Subject:
Date:

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

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

I am writing as a leaseholder [REDACTED] - 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 recommend removal of Site C27 from the Plan.

This proposal raises serious questions about Camden's planning priorities and use of scarce public land. At a time when thousands of local residents, including working families, key workers, and vulnerable individuals, are on the housing waiting list, it is both illogical and unjust to reserve a valuable site for low-density, non-permanent use that benefits a very small number of people.

The council itself has acknowledged Camden's acute housing crisis. This land could be used for a well-planned, sustainable affordable housing scheme that would provide long-term stability to dozens, potentially hundreds, of residents. To divert it for such a narrow and contentious purpose is, quite frankly, a dereliction of the council's duty to the wider community.

There are also deep concerns about the strain this development would place on local services, particularly policing, waste management, and road infrastructure. The Primrose Hill area, whilst welcoming and diverse, already contends with high footfall, traffic pressure, and proximity to high-crime zones nearby in Camden Town. No proper public impact assessment has been made available to residents to show how these risks would be mitigated.

Moreover, the lack of transparent public consultation on this matter is unacceptable. Major land use decisions must be made through open dialogue, especially when they impact long-standing, family-oriented communities.

We must ask:

- Why has this land not been considered for affordable housing when demand is so high?
- Where is the evidence that this location is appropriate or sustainable for this specific use?
- What precedent does this set for future land decisions in high-density urban neighbourhoods?

In the interests of fairness, logic, and responsible public policy, I urge Camden Council to halt this proposal and instead commit to using this land for a housing solution that benefits the many, not the few.

Yours sincerely,
Rebecca Lewis

From: -
To: [PlanningPolicy](#)
Subject: objections to Adelaide Road travellers pitch
Date: 25 June 2025 14:50:58

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.

Hello planning policy officer

I am a resident (redacted). I am only commenting on Adelaide Road as it is the one closest to me and I know the space. Don't know the spaces referred to on Oval Road for example.

The site on Adelaide road is a completely inappropriate choice for both travellers and residents, but mostly for travellers. I am a resident. I am sure you will hear from lots of residents giving their thoughts, so I am going to share objections based my knowledge of the traveller community (am Irish and have had a bit of contact with them over the years).

The pitch is simply too small and too exposed. No camp should ever be considered of less than 6 caravans ideally 8 or bigger. More caravans will come and stay a good while, and there has to be the flexibility to allow for this. Like everyone else children get married and want to be near their parents (groom's family usually takes precedence), parents get elderly or get sick etc. Travellers need some discretion to manage their sites. On this site it will be pounced on that conditions are breached and there will be complaints flying around etc. It is also a poor space for little kids to play, they deserve better.

It's not just about being overlooked (which they will hate). Travellers I have known, like to have sites where they can secure the boundaries and control who comes in and out for safety and other reasons. How would that work here? You could put up a wire fence but that would make it like a prison camp.

Every traveller home I have ever been in has been immaculate. However, they do tend to store lots of stuff outside (fridges, bits and pieces etc) and they have every right to do this in my opinion, it is their home. This will bother residents as they would most likely take it as an indication that things are going to rack and ruin. You could say 'how middle class of them', but residents should have a say in how the neighbourhood looks and how it is kept. Residents are also living in a borough (and neighbourhood) where phone and bag snatchings, muggings and robbery are rife and people are anxious, scared and on high alert. They are resentful that nothing is being done. I would hate to see any of this anxiety and resentment unfairly misdirected towards travellers. We are living in very troubling times.

I would love to see the travellers getting a few large, fairly secluded camps in Camden, with decent facilities where they can follow their way of life in peace and safety. I don't know the Camley sites but they sound like a good option.

More does need to be done to educate settled people about travellers and vice versa and bring communities together but this is a separate campaign and should have a high level of traveller involvement in its development. Also investigation of the issues that both parties have with each other so they can be understood by each other, addressed and dismantled.

Could you not use the Adelaide road site to build a small number of high density social housing? Please Camden, build more social housing for your residents.

Best regards

Fiona

Fiona Sheridan

Responder 298

Date: Wed, 25 Jun 2025 13:53:53 +0000
From: bernard caplan
To: PlanningPolicy
Subject: Camden Local Plan: objections to site C27 Land East of Constable House,
Adelaide Rd Gypsy&Traveller site

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

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Bernard Caplan

[redacted address]

[redacted postcode]

[REDACTED]
[redacted email]

OBJECTION

Proposed. Modification

Delete Site Allocation C27 Land adjacent to Constable House, Adelaide Rd

for Gypsy and Traveller accommodation

Site C27 should be deleted from the following.

Chapter4 Central Camden: Table5

Chapter 7:Meeting Housing Needs:Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Playground

area was constructed as a play area for residents of Constable House

and is in use as a play space. It is identified on OS maps as a playground.

If this is lost there are no available sites for the children to play nearby.

Overlooking

Site overlooked on all sides

From 4/5, storey Constable House, residents Provost Rd, 6 storey Etons and residents Primrose House, Bridge House Adelaide Rd.

Flood risk

Site lies within flood risk zone has had recent flooding.

Loss of Green space

Last few months site been planted with wild flowers and trees .

All these would be lost.

No independent access to site.

Disruption to residents and traffic congestion on very busy

Adelaide Rd.

Constraints in Gypsy and traveller Site identification have not been applied to this site.

Also proposal not consistent with other policies in draft Camden plan which is supposed

to provide new areas of open space and improve sport and leisure facilities for young people

as well as delivering flood mitigation measures.

There has been no consultation with local residents in relation to proposed use of site.

For all reasons given the Camden Draft Plan should be modified by deletion of site 27.

Sent from my iPad

Responder 299

From: [REDACTED]
To: [REDACTED]
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller To: Camden Council Planning Policy Teamer Site) Of Draft Local Plan.
Date: 25 June 2025 15:08:48

You don't often get email from [REDACTED] [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.

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 support the 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).

I make the following representations also on my own accord as a resident of [REDACTED] who will be directly impacted by the planned site allocation.

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).

Please don't hesitate to contact me if you require any further information.

Kind regards

Gina Sternberg

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.

Responder 300

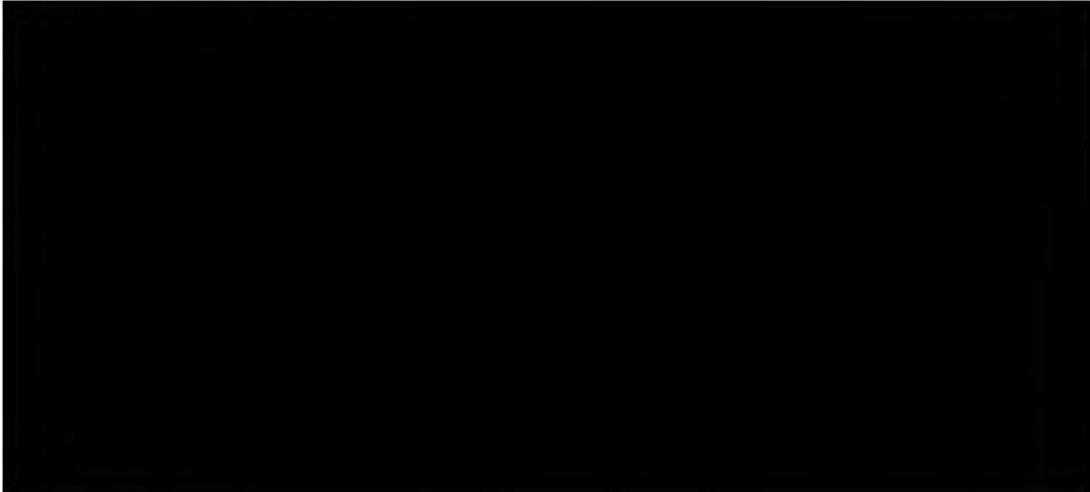
Date: Wed, 25 Jun 2025 14:31:19 +0000

From: Clare White

To: PlanningPolicy

Subject: Gypsy/traveller site

Dear sir/madam



Best wishes

Clare white

Sent from [Outlook for Android](#)

Date: Wed, 25 Jun 2025 14:32:22 +0000
From: Ngaia FITZHARDINGE
To: PlanningPolicy, [REDACTED]
(Cllr)
Subject: Objection to proposed use of Site C27: Chalk Farm- Gypsy and Traveller accommodation site

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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)

Dear Camden Planning,

I do not have an email account, so I am using my neighbour's to register my strong objection to your proposal for Site C27 for the Chalk Farm Gypsy and Traveller accommodation site.

Feel free to contact me on my landline to verify this objection, on [REDACTED]
I live at [redacted address], London [redacted postcode].

I am in my eighties, live alone, and walk past this site daily on my travels.
This proposal makes me feel vulnerable, walking past in the dark on my own with caravans in what was previously a calm, green space. These long-standing pockets of green space are essential to the well-being of the local community, of all ages.

Furthermore, I recognise that there is some ill-feeling towards Travellers from certain elements of society and feel that this site in no way provides them with a secure and permanent accommodation option. It is a small, very public site on a main road corner, open on two sides, leaving only one side out of view or inaccessible. It is situated directly on the main route to the tube station, with high foot traffic, and located on a busy road, which will be noisy for those living in caravans, which are not subject to the same building codes as built accommodation to minimise sound pollution. This site is not suitable for accommodation, which is why it wasn't developed previously.

Finally, there was inadequate notification and community consultation regarding this proposal.
The Primrose Hill Library was unaware of it, and I only discovered it yesterday on a discreet notice taped to a pole near the bridge.

I have spoken to many people about it since, and they have been surprised to hear of it. There seems to be a lack of transparency in this process.

Sincerely,

Gail Fernyhough

[redacted address]

[redacted] [redacted postcode]

[redacted]

Responder 302

Date: Wed, 25 Jun 2025 14:47:43 +0000

From: Suzy Littlejohn

To: PlanningPolicy

Subject: Camden Draft Local Plan 2025 response on behalf of Primrose House
NW3 Limited

Camden Local Plan – Proposed Submission Draft 2025 Representation Form

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

E-mail: planningpolicy@camden.gov.uk

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

This form has two parts –

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

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

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

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Suzy"/>	<input type="text"/>
Last Name	<input type="text" value="Littlejohn"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<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: PRIMROSE HOUSE NW3 LIMITED

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

Documents can be found at the following links:

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

Paragraph Policy Policies Map

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

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 checked="" 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.

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

(Continue on a separate sheet if necessary)

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

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

Please see attached 'Formal Objection to Proposed Allocation of Site C27 for Gypsy and Traveller Accommodation' which includes proposed modification. For the reasons stated, Primrose House NW3 Limited proposes that Site Allocation C27 (Land adjacent to Constable House, Adelaide Road) be deleted from the Camden Draft Local Plan.

A more transparent, consistent, and community-responsive approach to Traveller accommodation should be pursued.

(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:

Representatives of [REDACTED] shall attend any hearings to ensure the views of the leaseholders and residents of [REDACTED] - who have been denied meaningful consultation and transparency throughout the process are heard and considered.

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

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

(a) when the Camden Local Plan has been submitted	<input checked="" type="checkbox"/>
(b) when the Inspector's Report is published	<input checked="" type="checkbox"/>
(c) when the Camden Local Plan is adopted	<input checked="" type="checkbox"/>

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:

[REDACTED]

Date:

25/06/25

Notes to accompany the Representation Form

1. Introduction

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

2. Legal Compliance and Duty to Co-operate

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

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

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

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

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

3. Soundness

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

- ***Positively prepared***

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

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

- ***Justified***

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

- ***Effective***

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

- ***Consistent with national policy***

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

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

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

4. General advice

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

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

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

Submitted by:

[Redacted]
[Redacted]
[Redacted]

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

Proposed Modification

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

References

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

Grounds for Objection

1. Legal Non-Compliance

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

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

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

2. Unsoundness of the Plan

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

a) Inappropriate Use of the Site

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

b) Increased Traffic

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

c) Flood Risk

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

d) Failure to Apply Selection Constraints Evenly

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

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

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

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

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

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

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

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

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

3. Failure of the Duty to Co-operate

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

Conclusion

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

Responder 303

Date: Wed, 25 Jun 2025 16:03:55 +0100
From: Rachel Brodtman
To: planningpolicy@camden.gov.uk
Subject: Objection to Site C27 Designation - Adelaide Road Proposal

My name is Rachel Brodtman, and I live at [redacted address].

[redacted] I am writing to express my objection to the proposed designation of Site C27 - Land East of Constable House - as a Gypsy and Traveller site under the draft Camden Local Plan.

While I strongly support Camden's obligation to provide suitable housing for Gypsy and Traveller families, Site C27 is simply not a safe or respectful place to ask any community to live.

The site backs directly onto the Constable House children's playground, which - though modest in size - is a vital green space for families in the area. It offers rare respite in an otherwise densely built environment. Replacing that with residential pitches would not only eliminate a valuable community asset but create difficult living conditions for those placed so close to constant noise and foot traffic.

There are serious concerns about safety and access too. The site is surrounded by pedestrian areas and vehicle bays, with very limited turning space. Emergency vehicle access would be compromised, creating a real risk to future occupants.

The proposed use of this land also appears inconsistent with several key planning policies, including Camden Policy H10, the Government's Planning Policy for Traveller Sites, and the London Plan. These policies stress environmental suitability, privacy, and compatibility with surrounding uses - criteria which Site C27 clearly fails to meet.

Finally, like many others in the area, I was only made aware of this proposal recently. The absence of earlier consultation suggests a lack of transparency and community involvement in the decision-making process.

I respectfully urge the Council to withdraw Site C27 from the draft plan and to pursue more appropriate and dignified alternatives.

Sincerely,
Rachel Brodtman
[redacted address]

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Rachy Brodtman