

Date: Thu, 26 Jun 2025 15:30:08 +0000  
From: Issy Matthey  
To: planningpolicy@camden.gov.uk  
Subject: Objection to Proposed Gypsy and Traveller Site Allocations in Camden Local Plan

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Dear Planning Policy Team,

I am writing to express my strong objection to the proposed allocation of land adjacent to Constable House (Eton College Road) and at Freight Lane (York Way Depot) for use as Gypsy and Traveller sites in the Camden Local Plan.

While we recognise the need for inclusivity and housing for all sectors of society, including the Traveller community, we believe that these proposed sites are not suitable for the following reasons:

#### 1. Negative Impact on Residential Amenity

Both sites are located in close proximity to established residential communities. Introducing additional housing on these small parcels of land—particularly the Constable House site, which is extremely limited in space—risks creating issues of:

- Overcrowding,
- Noise pollution,
- Loss of daylight and privacy,
- Reduced air quality, and
- Increased pressure on shared amenities.

#### 2. Littering and Waste Concerns

Existing traveller sites across the UK have, in some cases, led to increased littering and improper waste disposal. Despite Council management plans, residents are worried about the site being inadequately maintained, affecting cleanliness, hygiene, and attracting vermin.

#### 3. Loss of Potential for Broader Community Benefit

The selected sites could serve better purposes, such as:

- Affordable housing units for families on long waiting lists,
- Community green space,
- Local business support,
- Playgrounds or facilities for young people.

These uses would align more broadly with the needs of the wider local population.

#### 4. Traffic, Parking, and Access Issues

The Constable House site in particular has limited vehicular access and is already congested. Additional large vehicles, including caravans or service vans, may exacerbate traffic and reduce available parking for residents.

## 5. Site Unsuitability and Space Constraints

These are small, urban plots not designed to accommodate a nomadic-style community or static pitches. The confined layout could lead to overcrowding and safety hazards both for those on the site and nearby residents.

## 6. Security and Social Cohesion

Many residents are anxious about potential increases in antisocial behaviour, especially given the close proximity of the proposed sites to family homes, parks, and schools. Whether justified or not, these concerns significantly affect the sense of safety and cohesion in the community.

## 7. Negative Impact on Property Values

It is well-documented that proximity to temporary or traveller accommodation can depress house prices in surrounding areas, creating financial disadvantages for long-standing residents.

## 8. Alternative Options Not Fully Explored

The decision to select these two sites appears based on an exclusion process rather than an affirmative demonstration of suitability. From the FAQQ document, 166 of the 188 originally identified sites were ruled out. This does not necessarily mean the remaining two are genuinely fit for this specific purpose.

The FAQs document notes that other sites were dismissed for relatively minor reasons such as loss of parking or overlooking. It is concerning that more appropriate locations with lower residential impact were not prioritised instead.

I strongly urge the Council to reconsider the proposed sites and undertake further consultation to identify more suitable, less disruptive locations for Gypsy and Traveller accommodation.

Thank you for your attention to this matter.

Kind regards,  
Isabella Matthey

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

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

#### 1. Loss of Valued Community Amenity Space

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

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

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

#### 2. Overlooking and Loss of Privacy

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

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

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

#### 3. Flood Risk – Unsuitable for Highly Vulnerable Use

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

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

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

#### 4. Access Constraints and Undeliverability

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

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

## 5. Unsound Site Selection Process and Lack of Transparency

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

- The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- The allocation of Site C27 was not disclosed during earlier consultation rounds.

Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

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

## 6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

## 7. Better Alternatives Exist

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

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

## Conclusion and Requested Action

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

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

Eleanor Evans



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

By email to: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

26<sup>th</sup> June 2025

Dear Sir/Madam,

**Local Plan Review Regulation 19 Consultation**

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Generally, we believe that the Plan is sound, legally compliant, and conforms to the 'Duty to Cooperate. We support the Plan's environmental policies particularly the commitment to ensure Camden becomes a net zero borough by 2030. However, we would like to re-emphasise the concerns we expressed during last year's regulation 18 consultation that the Plan should be more ambitious about creating new parks and green spaces across the borough.

**Policy NE1 The Natural Environment**

We support the Council's commitment to protect the openness and character of Metropolitan Open Land and other designated open spaces in accordance with London Plan policy and policy guidance in the National Planning Policy Framework (NPPF). We're pleased that the Council has recognised that development within gardens and other undeveloped areas can have a significant impact upon the amenity and character of the local area and may increase local flood and heat risk. We support the Council's commitment to protect these spaces.

Currently property owners can pave front and back gardens without difficulty and have little or no incentive to de-pave or re-green areas of hardstanding. In particular, conversion of front gardens for car parking does not require planning permission and requirements to make surfaces permeable where gardens are converted, are simply unenforceable.

The Plan should require planning permission for conversion of front gardens for parking (i.e. remove Permitted Development Rights) and set out clear limitations on when planning permission for conversion of front gardens for parking ('driveways') will be permitted (given the need to reduce water runoff, manage air temperature, increase biodiversity habitat and improve streets to promote active travel).

**Policy SC4 Open Space**

We also support the Council's commitment to protect and enhance the network of open spaces and local green spaces across the borough. The Plan should also introduce a policy to create streetparks in Areas of



Deficiency. There remain many Areas of Deficiency in Camden particularly in the west and south of the borough where new public parks and nature reserves can and should be created. 'Streetparks' can be created from 'grey space' i.e. superfluous roads should be converted to accommodate new rain gardens, pocket parks or whole or part of a street converted to a 'streetparks' like Alfred Place.

#### **Policy T5 Parking and car-free development**

We strongly support the Council's commitment to limit the availability of parking, redevelop existing car parks for alternative uses and require all new developments in the borough to be car-free. The Plan must also recognise the need and allocate space for sustainable/active transport including delivery hubs.

#### **Site Allocations**

- C3 (KT3) – Murphy Site: Any development on this site should ensure that there is no adverse impact on the openness of Hampstead Heath, and the views from it, including from Parliament Hill.
- W7 (IDS10) – Gondar Gardens Reservoir: This should be removed from the site allocations and retained in its entirety as a green space for the public to enjoy.
- N2 (IDS12) – Former Mansfield Bowling Club: This should be removed from the site allocations and safeguarded as a green space for community use or as a nature reserve for wildlife.

#### **Roughly 350 acres of kerbside space**

We estimate some 350 acres of land in Camden is kerbside space, most of which is likely to be 'rented' cheaply for private car parking. The Local Plan should propose re-allocation of land-use for at least 25% of the estimated 350 acres of kerbside space in Camden – referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council's [Kerbside Strategy](#)).

Thank you for considering these points.

Yours faithfully,

John Sadler  
Campaigns Officer  
CPRE London

Responder 413

Date: Thu, 26 Jun 2025 15:42:34 +0000

From: Carl Bétant-Rasmussen

To: PlanningPolicy

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

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Dear Camden Council,

Please find attached an objection from George Adamopoulos of Best Star Real Estate regarding the proposed Gypsy and Traveller site allocation (Site C27) in the Camden Local Plan.

George Adamopoulos represents the owner of the residential development located at [redacted], and submits this objection on behalf of the development and in the interest of its future residents.

Kind regards,

Carl Betant-Rasmussen

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**CARL BETANT-RASMUSSEN**

**BEST STAR REAL ESTATE**



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

**PERSONAL DETAILS**

Name: George Adamopoulos, Best Star Real Estate

[REDACTED]

**OUTLINE OF OBJECTION/REPRESENTATION**

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

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

**REASONS**

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

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

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

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

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

### **Conclusion**

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

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

## 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](mailto: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)	
Title	<input style="width: 95%;" type="text" value="Mr"/>	<input style="width: 95%;" type="text"/>
First Name	<input style="width: 95%;" type="text" value="Robert"/>	<input style="width: 95%;" type="text"/>
Last Name	<input style="width: 95%;" type="text" value="Seward"/>	<input style="width: 95%;" type="text"/>
Job Title (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Organisation (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Address Line 1*	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" type="text"/>
Address Line 2	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" type="text"/>
Post Town*	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" type="text"/>
Post Code*	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" type="text"/>
Telephone Number	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" type="text"/>
E-mail Address	<div style="background-color: black; width: 100%; height: 15px;"></div>	<input style="width: 95%;" 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 H11 Pages  
294-5 Policies Map

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

(1) Legally compliant	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input checked="" style="width: 80%; height: 20px;" type="text"/>
(2) Sound	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input checked="" style="width: 80%; height: 20px;" type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80%; height: 20px;" type="text"/>	No	<input checked="" style="width: 80%; height: 20px;" type="text"/>

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

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

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

(1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	<input checked="" style="width: 90%; height: 30px;" type="text"/>
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	<input checked="" style="width: 90%; height: 30px;" type="text"/>
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	<input style="width: 90%; height: 30px;" type="text"/>
(4) Consistent with national policy	<input checked="" style="width: 90%; height: 30px;" 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 Camden Local Plan Submission draft does not justify the claims that it states. There is no argument as to why the gypsy and traveller accommodation is required nor why those sites have been chosen.

There is a national shortage of houses and there is no explanation of why these areas are not suitable for house-building or other accommodation. It is unclear how these sites are going to be administered or whether the area is in any way suitable.

There are probably alternatives which have not even been mentioned, nor is there any suggestion that there will be any proper discussion.

Further, this appears to be rushed through in such a way that the public will not even be aware of what is happening and certainly not why. Normally a proposal of this type requires cooperation between other neighbouring authorities since this type of development will have an impact that is much more extensive than just the immediate vicinity.

This means that the necessary requirements have not been fulfilled as is legally necessary.

(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.

There has been no proper consultation and it appears that the council officers are hoping to push this through before the general public is aware of what is happening.

(Continue on a separate sheet if necessary)

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

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

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

No

Yes

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

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

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

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

**Privacy Notice**

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

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

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

<b>11. Signature:</b>	<b>Robert C Seward</b>	<b>Date:</b>	<b>26 June 2025</b>
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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 415

Date: Thu, 26 Jun 2025 15:54:13 +0000

From: simon neave

To: planningpolicy@camden.gov.uk

Subject: Site allocation. C27 land east of Constable House. Adelaide Road

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We at [redacted address] [redacted], were only alerted to this seismic change to our immediate vicinity four days before the closure of the consultation. Our formal response is thus limited to a very strong endorsement of the excellent response of the Adelaide Road Tenants Association & the points made strongly by the Gloucester Avenue Association.

And also this point.

The quality of our urban lives depends not only on the design of our homes but also on the urban landscape we pass through. The residents of Primrose Hill Village frequently use the zebra crossing over Adelaide Road on their way to & from Chalk Farm Tube Station. Our zebra crossing is extremely close to Site 27.

The rape of an open space with fine trees & its replacement by a dense Gypsy Traveller Site beside the crossing would detract significantly from the amenity of what is otherwise a calming walk for thousands of residents, schoolchildren & visitors daily.

Primrose Hill attracts large numbers of visitors, via Chalk Farm Station. The experience of their visit will be spoilt by the proximity of a Gypsy Traveller Site immediately next to the zebra crossing across Adelaide Road.

Finally the sense of open space in Adelaide Road is currently being severely reduced by the replacement of the former MI5/Met police garage & office building in Adelaide Road adjacent to Chalk Farm Station by a far more massive structure which will also reduce the sense of openness. And a 7 story hotel is approved by Camden to replace 3 stories 60 yards away at the junction of Regents Park rd & Haverstock Hill.

S. Neave & S Osaku at [redacted address]

[redacted postcode]

Sent from my iPhone

Responder 416

Date: Thu, 26 Jun 2025 15:45:56 +0000  
From: Joanna Charrington  
To: PlanningPolicy  
Subject: Proposed development of land east of constable house

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

Please can I have more details.

I am concerned about increasing crime in the area.

Thank you.

Jo Charrington  
Sent from my iPhone

Responder 417

Date: Thu, 26 Jun 2025 16:00:27 +0000

From: Charlotte Orrell

To: 'planningpolicy@camden.gov.uk'

Subject: Local Plan Submission Draft 2025 Consultation - LCR Representation

---

BC/CO/DP5408  
26/06/2025

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

By email to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Sir/ Madam,

**LB CAMDEN LOCAL PLAN PROPOSED SUBMISSION DRAFT 2025  
CONSULTATION  
REPRESENTATIONS ON BEHALF OF LIFECARE RESIDENCES LIMITED**

Thank you for the opportunity to provide input in to and to inform the emerging London Borough of Camden ('LB Camden') New Local Plan. This representation is made on behalf of LifeCare Residences Limited ('LCR'), in response to the Submission Draft 2025 consultation.

**Background**

LifeCare Residences Limited is a specialist provider of retirement and older person communities in the United Kingdom. LCR takes a fresh approach to providing purpose-built housing for people over the age of 65, offering residents an independent lifestyle in their own home, with access to an extensive range of high-quality facilities and 24-hour nursing care and emergency assistance. LCR own the freehold of Gondar Gardens Reservoir in West Hampstead which is afforded a draft Site Allocation (W7) within the emerging Local Plan. Since its closure in 2002, the site has provided an open, but inaccessible green space and remains undeveloped.

These Local Plan representations have regard to the Draft Gondar Gardens Site Allocation W7 alongside draft Local Plan's approach to the role of specialist care home residences within the Borough.

**Draft Policy H1 – Maximising Housing Supply**

LCR support the recognition added to Policy H1 with regards to the role that alternative forms of housing beyond traditional self-contained homes can play in relieving pressure on existing housing stock and providing a fit for purpose housing supply.





## **Draft Policy H8 – Housing for older people, homeless people and other people with care or support requirements**

It is noted that Policy H8 has undergone substantial redrafting which is welcomed by LCR. In particular the support by the borough for a variety of specialist housing for older people (beyond Extra Care Housing).

Draft Policy H8 does however note that market-led care homes should be provided at costs consistent with the North Central London minimum sustainable bandings or provide access to a proportion of places for Council-funded residents at a sustainable cost.

LCR understand the demand and need for further care home provision within the borough, particular specialist care home provision, and the need to ensure a supply for all individuals of varying demographics. The borough's policy drafting however suggests a dictation in the costs which can be charged to those staying in a care home. These rental levels do not form part of the draft Plan's evidence base, nor can these rental levels easily be accessed publicly. The specific cost control is a significant concern to LCR, both in terms of transparency of that data, the validity of the proposed bandings and the implications on development appraisals. It is of further concern that the policy does not allow for viability review of the implications of the proposed rental level controls on the deliverability of a development, nor provide any detail as to how this will be calculated and enforced. The proposals are not in accordance with the London Plan 2021 and due to the lack of transparency and supporting information it is LCR's recommendation that this element is removed from the draft policy.

## **Gondar Gardens Site Allocation W7**

LCR welcomes the revisions made to the Site Allocation W7 in respect of Gondar Gardens, notably the specific reference to the site being appropriate for both self-contained homes and/or specialist care homes.

The Site Allocation rightly recognises the complexities of the existing site, including the existing decommissioned reservoir structures and the portion of the site which is designated as a Site of Importance for Nature Conservation (SINC). The draft Allocation states an indicative site capacity for a 'housing-led development' of 30 additional homes. The Allocation acknowledges that this is based upon historic planning applications for the site since 2011, which have proposed either residential or specialist forms of housing for the elderly.

It is noted that the Site Allocation continues protect views across the site from private properties whose rear elevations and rear gardens are situated along the boundary of the site. It has long been established that there are no rights to a view from a property, unless specifically identified as a protected or locally important view which contributes to the interest and general character of Camden. The site is not located within a conservation area, nor does the scale and accessibility of the existing green space provide a sense of space which can be experienced by the public. Furthermore, any application would be required to be assessed in terms of its impact on the outlook and amenity of the existing residential properties adjacent to the site. LCR therefore questions the legal standing of the Site Allocation requirements to '*protect views across the site from harm or loss*' and request again that this is removed from the Site Allocation wording.



LCR welcome the opportunity to comment on the Local Plan Proposed Submission Draft and respectfully request that the above comments are considered in the finalising of the new Local Plan.

Yours faithfully

DP9 Ltd.

**DP9 Ltd.**

Responder 418

Date: Thu, 26 Jun 2025 16:06:05 +0000  
From: Pam Dennis  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: Proposed development of Traveller site on cnr Adelaide Road and Eton College Road

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I vehemently disagree with the granting of permission to the proposed traveller site on the corner of Adelaide Road and Eton College Road.

I cannot see that this proposal promotes the interests of Camden Residents whom I assume you are elected to represent.

Yours sincerely,

Pamela Dennis  
[redacted address],  
[redacted postcode]

Date: Thu, 26 Jun 2025 17:08:30 +0100  
From: James Lawley  
To: [redacted]  
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road (Gypsy And Traveller Site) – Draft Local Plan.

---

From:  
James Lawley

[redacted]  
[redacted]

Email address: [redacted email]

[redacted]  
[redacted]

I would like to register my objection 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.

I request the removal of Site C27 from the Plan on the grounds that its allocation is unsuitable.

A summary of my objection is as follows:

- 1. The loss of a long-established green space.** It has been scientifically established that green spaces in cities are vital for the physical and mental well being of residents. Removal would be contrary to Government, regional and local planning guidelines.
- 2. The loss of a community amenity space including a play areas for young people.** This goes against Government, regional and local planning guidelines.
- 3. The size of the site.** It seems very few pitches could be fitted on such a small site making it unviable especially as it is unclear how access to the site would be achieved given the current configuration of streets. It even seems that the Traveller community don't like the proposal and fear losing their current accommodations (<https://www.camdencitizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites>).
- 4. The lack of privacy** due to overlooking from nearby buildings as well as the number of pedestrians and cars that pass by the site each day. The lack of privacy would be felt by the travellers, and residents of Constable House and the Etons alike.
- 5. Lack of transparency and consultation in site selection.** There has been very little notification of these plans, explanation of how the decision was arrived at, and as far as I am aware, no consultation with local residents. This runs counter to the council stated aim for transparency and consultation in planner matters.

To conclude, I request that Site C27 be removed from the Camden Local Plan on the grounds that its allocation is unsuitable and contravenes many established local, regional and national planning policies.

Please acknowledge receipt of this email and keep me informed of any further developments related to this proposal.

Responder 420

Date: Thu, 26 Jun 2025 16:30:16 +0000  
From: Beverley Silverstone  
To: PlanningPolicy  
Subject: Site C27- Propose Submission Draft (Regulation 19)

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We respectfully request that the Planning Inspector recommend removal of Site C27 from the Plan (Gypsy and Traveller Site) on the grounds that its allocation is unsound.

Beverley & Anthony Silverstone

Date: Thu, 26 Jun 2025 17:03:34 +0000  
From: [REDACTED]  
To: PlanningPolicy  
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

---

I'd want to object to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

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

#### 1. Loss of Valued Community Amenity Space

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

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

#### 2. Overlooking and Loss of Privacy

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

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

### 3. Flood Risk – Unsuitable for Highly Vulnerable Use

The site is located within a mapped Local Flood Risk Zone (LFRZ) and identified in Camden's 2021 surface water flood data as subject to risk. Traveller pitches are considered a "Highly Vulnerable Use" under Planning Practice Guidance (PPG). The proposal therefore fails the sequential and exception tests required for flood-prone locations, and is in breach of:

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

### 4. Access Constraints and Undeliverability

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

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

### 5. Unsound Site Selection Process and Lack of Transparency

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

- \* The selection rationale for these final sites is not provided, contrary to NPPF paragraph 16(d) (plans must be justified and explainable);
- \* The allocation of Site C27 was not disclosed during earlier consultation rounds.

Residents were only made aware of its selection in the May 2025 Regulation 19 Draft, undermining effective participation.

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

### 6. Conflict with GTSIS Methodology and Exclusion Criteria

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

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

### 7. Better Alternatives Exist

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

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

## Conclusion and Requested Action

The allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. It is unsound due to: - The loss of essential amenity space; - Inherent flood, privacy, and access constraints; - A flawed and opaque site selection process. It clearly fails the key tests of justification, effectiveness, and consistency with national policy set out in paragraph 35 of the National Planning Policy Framework (NPPF).

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

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

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

Kind regards,

Andreas Lidstrom

Date: Thu, 26 Jun 2025 17:10:47 +0000  
From: Steve Lewis  
To: Nasrine Djemai (Cllr), Kemi Atolagbe (Cllr), Rebecca Filer (Cllr), PlanningPolicy  
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road  
(Gypsy And Traveller Site) Of Draft Local Plan.

---

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

To: Camden Council Planning Policy Team  
Re: Camden Local Plan Proposed Submission Draft (Regulation 19, 2025)

I am writing, as a resident of [redacted] [redacted postcode] to object in the strongest possible terms to the proposed allocation of Site C27 - Land East of Constable House, [redacted postcode] - for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

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

---

**1. Loss of Valued Community Amenity Space**

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

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

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- Camden Local Plan Policy A2(e);
- Case law (e.g. Copas v Royal Borough of Windsor and Maidenhead [2001] EWHC Admin 548) confirming informal community land requires robust justification prior to redevelopment.

---

**2. Overlooking and Loss of Privacy**

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

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

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

---

### 3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

- NPPF Paragraph 167 (requiring development to be appropriately flood resilient);
- PPTS Paragraph 13(g) - sites must not be at high risk of flooding;
- 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.

Steve Lewis



[redacted email]

Responder 423

Dear Team,

I am writing to formally object to the proposed allocation of a new traveller accommodation site on land east of Constable House, Adelaide Road. I am deeply concerned with the lack of timely communication with the local community regarding these plans. The decision to designate land for a Traveller site is being pursued without sufficient notice or consultation with local residents. This oversight will leave many feeling excluded from an important decision that will significantly affect our local environment, infrastructure, and quality of life.

The proposed site is located adjacent to residential homes, chalk farm tube station and other local amenities, which raises serious concerns about privacy, (for both current residence as well as new arrivals to the site) as well as safety and security, for locals and those visiting the area for work or leisure with public transport.

The site in question currently provides an amenity space. Allocating it for restricted residential use to a traveller community would result in a significant loss of this functional space, which is a critical resource for local residents and the wider community in an area, with already limited recreational facilities.

Further concerns that this initiative raises is vehicle access to this site. The adjoining estate roads cannot accommodate large vehicles, trailers, waste collection and the wider safety issue of emergency service vehicles.

In light of these concerns, I respectfully urge you to reconsider this proposed allocation. I believe a more thorough investigation into the site's environmental and social implications is required, and that alternative sites, which are better equipped to handle the specific needs of Traveller accommodation, should be explored.

Kind regards

Jeremy King

Date: Thu, 26 Jun 2025 17:28:25 +0000  
From: Matthew Miles  
To: PlanningPolicy  
Subject: Objection to planned relocation of Camden Recycling centre

---

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Dear Camden planning policy team,

I am writing to give feedback on the draft local plan currently out for consultation concerning the redevelopment of the Regis Road site in Kentish Town.

The latest version released in March suggests placing the recycling centre next to residential properties on Holmes Road and opposite St Patrick's School - on part of the current police station site. This new aspect was not subject to public consultation in the same way as earlier iterations.

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

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

Residents such as myself already suffer a great deal of antisocial behaviour and noise, including from the Stay Club on Holmes Road. Placing the recycling centre here will add to noise, air pollution and disruption, creating a substantial further negative effect on the amenity of residents and on the school community. Many visitors to the current recycling centre leave their cars idling, so there could also be a potential effect on air quality for school children.

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

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

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

Kind regards

Matthew Miles

██████████ [redacted address]

[redacted postcode]

Date: Thu, 26 Jun 2025 17:57:41 +0000  
From: Judy HILL  
To: PlanningPolicy  
Subject: Objection to C27 – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)

---

I am contacting you to object to **C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller site)**

- Name: Judy Hill

- 

[REDACTED]

- 

[REDACTED]

#### **GROUNDS FOR OBJECTION**

##### **Amenity Land Linked to Residential Housing**

The site in question constitutes part of the designated amenity space serving Constable House and the surrounding community. Its proposed redevelopment would result in a significant loss of open space currently benefiting residents in this high-density urban area. The loss would materially diminish the quality of life for both Constable House occupants and the wider neighbourhood.

##### **Designated Green/Open Space - Ecological and Community Value**

This location is recognized as valuable Local Green Space/Open Space. It includes established mature trees and recent community-led greening initiatives. In particular, the Communi-Trees project-undertaken collaboratively by the KOKO Foundation, Think & Do, and Camden Council-has led to the planting of fruit trees and wildflowers, fostering biodiversity and engaging local youth in environmental stewardship. The proposed development would require the complete removal of this planting, as well as the clearance of between 30 and 60 mature holly trees, depending on the site's final boundaries.

##### **Play Area Use**

The land was originally developed as a play space for the benefit of Constable House residents and continues to function as such today. Historic Ordnance Survey maps identify it as a playground. No equivalent or alternative space exists nearby to replace this amenity. Its removal would therefore deprive local children and families of accessible, safe outdoor play provision.

##### **Overlooking and Loss of Privacy**

The site is overlooked from all directions:

- East: Constable House (4-5 storeys)

- North: Residential properties on Provost Road
- West: Eton Place (6 storeys) and the new residential block being constructed at 5-[redacted address]
- South: Bridge House and Primrose House, along with Adelaide Road, a major east-west thoroughfare and bus route

Given this extensive overlooking, privacy and usability of any proposed development on the site would be significantly compromised.

### **Flood Risk**

The site lies within an area designated as at risk of flooding and has recently experienced severe flooding incidents, particularly affecting the play area. This directly contradicts paragraph 13 of the Government's Planning Policy for Traveller Sites.

### **Access and Infrastructure Concerns**

There is no dedicated independent access to the site. Any attempt to create access would cause substantial disruption to existing residents, especially those in Constable House. Furthermore, the proposed access point would be directly opposite the entrance to Eton Place, creating potential traffic and safety hazards.

### **Educational Provision**

There is no indication that an assessment has been made regarding the availability of school places in the surrounding area, which raises serious questions about the suitability of the site for residential use, particularly for families.

### **Failure to Apply Constraints from Site Assessment Criteria**

The relevant limitations outlined in Table 1 of the Gypsy and Traveller Site Identification Study do not appear to have been adequately applied to this location. These include:

- Council-owned residential properties and gardens
- Designated Local Green Space
- Existing Open Space
- Overlooking by neighbouring properties
- Loss of established play areas

Additionally, the proposal runs counter to key objectives in the draft Camden Plan, specifically the commitments to:

1. Develop or enhance sports and leisure amenities for youth
2. Expand open spaces and play areas and improve access to natural environments
3. Increase urban greening and support biodiversity

#### 4. Implement flood prevention and sustainable drainage systems

##### **Lack of Public Consultation**

There has been no meaningful consultation at all with affected residents. Many individuals living in Constable House and Eton Place, including myself remain unaware of the development proposals.

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##### **Conclusion**

In light of the points raised above, it is recommended that site C27 be removed from the Camden Draft Local Plan.

Thanks, Judy Hill

Responder 426

Date: Thu, 26 Jun 2025 18:11:07 +0000

From: [REDACTED]

To: PlanningPolicy

Subject: Travellers Site

---

Dorothy Marden

[REDACTED]

I am shocked at the prejudiced reaction of many of my neighbours - it feels like centuries of hostility to travellers is just under the surface and is jumping out without consideration of them as people!

Date: Thu, 26 Jun 2025 18:13:19 +0000  
From: Joel Reneby  
To: PlanningPolicy, Kemi Atolagbe (Cllr), Nasrine Djemai (Cllr), Rebecca Filer (Cllr)  
Subject: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

---

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

My name is Joel Reneby and I live in [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,

Dr Joel Reneby

[redacted address]

[redacted postcode]

Responder 428

Date: Thu, 26 Jun 2025 18:25:30 +0000

From: Nona Jones

To: PlanningPolicy

Subject: Folgate Estates - Local Plan Representations

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26 June 2025

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

By email to: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Sir / Madam,

## **New Camden Local Plan Proposed Submission Draft**

These representations are submitted on behalf of our client, Folgate Estates Limited (“FE”), in respect of the New Camden Local Plan Proposed Submission Draft. As you’re aware, Folgate Estates control the 6.23ha Murphy Site, Kentish Town which represents a key regeneration opportunity for the London Borough of Camden (LBC). The strategically important Site is allocated for comprehensive redevelopment including an indicative capacity for at least 750 additional homes under draft site allocation C3 of the draft Local Plan.

Folgate Estates is committed to continuing positive engagement with LBC to advance the forthcoming masterplan and supporting planning policy framework. We enclose the previously submitted detailed representations made during earlier consultation stages, which remain applicable to the latest Draft Plan. We request that both LBC and the Inspector thoroughly review these alongside this submission. These representations specifically highlight the critical matters that we believe need to be incorporated into the emerging policy to ensure the masterplan can be realised to its full potential.

### **1. Allocated Uses**

The Site is allocated for *“Industry / employment, permanent self-contained homes and student accommodation, community uses, [and] open space”*.

As per our previous submission, this must be broadened to allow for the widest range of uses to enable the development to respond to evolving market and community demand over the long-term delivery period of the phased development and enhance viability. This should include, office, life sciences, leisure (including cinema) and hotel uses for which there is clear demand. The flexibility for a greater variety of commercial uses would also have significant placemaking and masterplan benefits. We recognise that such an offer should not compete with the town centre, and these uses should be considered as acceptable where they can be positively justified.

It is welcomed that student accommodation has been included in the most recent Draft. However, FE maintain that given the scale of the Site and the quantum of homes sought, it would be entirely



appropriate to diversify the range of housing types provided to include build to rent, co-living, senior living and specialist accommodation (i.e elder care) which would provide for multiple demographics, contribute towards mixed communities in accordance with the Development Plan and would free-up nearby housing for more traditional family use.

Murphy's Yard has the opportunity to deliver a significant quantum of residential uses on Site to help achieve local housing need. However, policy needs to recognise the current challenges facing the housing market and provide sufficient flexibility to prevent hindering deliverability through supporting a wider mix of uses and housing tenures. We recommend accelerating viability discussions to inform design progression, ensuring delivery is not hampered and addresses current market realities. Furthermore, we recommend that the expenditure of CIL contributions should be more tactically deployed to benefit the contributing site. This targeted approach ensures that the funds generated from development are reinvested in a way that maximises the positive impact and overall success of the project.

## **2. Industrial Capacity**

Any proposed development at the Site is required to *"intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity..."* (Part 4).

Folgate Estates have previously submitted detailed representations both to the Local Plan and GLA Industrial LPG consultations regarding the approach to calculating industrial provision. These expressed concerns that if applied too strictly to existing industrial sites with low-intensity industrial or open storage use, such as Murphy's Yard, this requirement could significantly impact future redevelopment and limit the amount of other land uses from coming forward on Site. On this basis, the site allocation / policy should not prescribe a minimum industrial quantum and a wider assessment of the site context, market, and character should be taken into account when determining a site's realistic operational capacity, guided by good place making and masterplanning principles. This balanced approach will optimise both placemaking and housing delivery benefits and should be reflected in the core policies of the Local Plan.

Furthermore, light industrial will be an appropriate form of industrial use to be re-provided on the Site given the context of the local area and placemaking aspirations of any future masterplan. This should be reflected in the policy wording and above allocated uses.

## **3. Future Connectivity Links**

It is noted that new Part 24 of the allocation states that the development must *"include a new green corridor linking Kentish Town Road and Hampstead Heath to form the key pedestrian priority route through the site (the 'Heath line'). This must include the provision of cantilevered access over the railway line between the site and the railway bridge on Kentish Town Road. The route should be accessible to all with a green and attractive character, significantly enhancing biodiversity"*.

The aspiration for increased connectivity across the Site and to/from neighbouring Sites is fully supported. However, it must be recognised that the land required to deliver this aspiration is not entirely within Folgate Estates' ownership and the ability to deliver such a structure will rely on the outcomes of discussions with third parties and detailed feasibility and cannot be guaranteed. The need for Network Rail to continue to be able to access and maintain their operated land is also a fundamental consideration to the feasibility of any over-rail structures in this location.

The delivery of the Site should not therefore be tied to or subject to land outside of Folgate Estates' ownership and control. This remains a crucial consideration for development at the site and policy



should recognise that the ability to deliver connectivity aspirations is not solely in their control. As such, it is suggested that the policy is amended to encourage exploring the feasibility of such connections as opposed to an absolute requirement.

#### **4. Infrastructure Contributions**

Folgate Estates recognise and support the ambitions to provide, facilitate or contribute towards wider infrastructure improvements to support future development. However, this needs to be balanced with and subject to deliverability and viability considerations. The prevailing CIL rates are exceptionally high in this location (and in comparison to other large-scale allocations) and discourage housing delivery. It is requested this is acknowledged in the Site Allocation 'Other Considerations' for the avoidance of doubt.

#### **5. Building Heights**

It is acknowledged that the Site Allocation has been updated to include the full text with regards to the approach to building heights, recognising that additional height above the identified appropriate height range may be possible in some locations subject to further testing. This is a welcomed and justified approach that is now consistent with the other site allocations.

Notwithstanding, a design-led approach should ultimately be taken to establish the most appropriate building heights for development sites in accordance with the London Plan. Policy should also take into account of optimal land use and wider local plan objectives such as housing targets, rather than being prescriptively applied. While adopted views identified in the London Plan View Management Framework (LVMF) and local policies are acknowledged and should be sensitively considered, policy should avoid overly strict interpretations that may hinder future development and contexts. This balanced approach will enable good growth while respecting the city's visual character and heritage.

#### **Summary**

Given the size and complexity of the Site, any future masterplan will need to balance various priorities and pressures to deliver a significant quantum of development. This includes consideration to multiple land uses, a multi-year phasing and build period, access constraints, interfaces with operational railway land together with the aspiration to provide significant public benefits through a comprehensive redevelopment of the Site. Accordingly, policies must remain balanced in order to facilitate long-term delivery at the Site with sufficient flexibility to enable detailed consideration at the application stage.

We trust our comments will be taken on board in progressing the New Local Plan and we look forward to continuing to engage further with you in the future.

Yours faithfully



**DP9 Ltd.**

[REDACTED]  
12 March 2024

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

By email to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Camden Planning Policy,

## Regulation 18 Draft New Camden Local Plan Consultation

Thank you for the opportunity to comment on the London Borough of Camden's ("LBC") Regulation 18 Stage Draft New Local Plan (January 2024 version) consultation.

These representations are submitted on behalf of our client, Folgate Estates Limited who own the majority freehold of Site Allocation C3 (KT3) 'Murphy Site' ("Site"). A portion of land within the site is also under the ownership of Network Rail, but the whole site has historically been controlled by Folgate Estate.

Folgate Estates maintain a close working relationship with Network Rail who are aware of the wider ambitions for redevelopment and supportive of the overall vision. Notwithstanding, Network Rail reserve their position in regard to any future development on Site being subject to operational sensitivities they will continue to have unrestricted rights to access the site and at various points at any time in order to gain access to the railway.

### Introduction

The circa 6.3-hectare Site is located off Highgate Road and currently occupied by Folgate Estates' sister company, J Murphy and Sons Ltd - a substantial engineering and contracting business employing over 3,700 people worldwide, who run and will continue to run their global head office at Hiview House on Site. They are seen by Folgate as a substantial anchor occupier to a master plan being implemented.

The Site is located within the 'Central Camden' sub-area and is currently characterised by low intensity industrial use which is proposed to be allocated to be transformed by a comprehensive employment-led development to create a new vibrant, sustainable new mixed-use area, including circa 750 new homes.

The entire site is in the control of only two long-term owners, Network Rail and Folgate Estates, with multiple occupiers being on lease terms that allow for the phased implementation of any future redevelopment on Site.



Folgate Estates welcome the inclusion of the Site as part of LBC's transformative plans for the Borough and look forward to collaborating closely with the Council and the local community to unlock the Site's significant potential. Our shared goal is to bring forward a dynamic mixed-use masterplan that not only delivers substantial public benefits but also transforms and opens up a currently hidden part of the city into a new neighbourhood with emphasis on placemaking and stitching in to existing communities.

An outline planning application for the comprehensive redevelopment of the Site was previously submitted by Folgate Estates in January 2022 (Ref: 2021/3225/P) but was subsequently withdrawn in May 2022 in order to allow additional time to consider matters raised by officers and consultees. Nevertheless, Folgate Estates remain committed to delivering an exciting and unique masterplan at the Site.

Any future masterplan will also be cognisant of wider transformation happening in the wider area, including the ongoing proposals at Highgate Studios and allocation at the neighbouring Regis Road Site for a significant quantum of development. Folgate Estates maintains good relations with its neighbours and are committed to working closely with all relevant landowners and stakeholders to ensure a joined up approach. Furthermore, in accordance with the wider objectives of the Local Plan and We Make Camden corporate strategy priorities.

These Local Plan representations have had regard to the draft Local Plan as a whole and specifically focus to the Draft Murphy Site Allocation C3 (KT3), alongside supplementary comments on the vision for the Central Camden sub-area and wider Local Plan policies which will have implications for its future redevelopment. These representations also have due regard to the adopted Kentish Town Neighbourhood Plan (September 2016) and Dartmouth Park Neighbourhood Plan (March 2020) which set out the community's aspirations and planning policies for the area as well as the Kentish Town Neighbourhood Framework.

### **Murphy Site Allocation C3 (KT3)**

We turn first to the Murphy Site Allocation CT (KT3). Folgate Estates strongly support the proposed allocation and vision for the Murphy Site to create a vibrant, sustainable new mixed-use area in Kentish Town. The draft allocation C3 (KT3) recognises the huge potential the Site has to unlock transformative place making benefits to the area and contribute to achieving the Local Plan's target to deliver new homes and employment opportunities.

Certain detailed comments are provided on elements of the allocation below which reflect the fact that this is a strategic site with significant opportunity but also numerous constraints and competing priorities which need to be balanced. Retaining flexibility in how the Site can come forward over a lengthy build process will be critical to ensure its deliverability.

#### Allocated use: Permanent Self-Contained Homes

The site allocation identifies an indicative capacity of 750 additional homes on Site which is equivalent to almost one year of Camden's annual housing requirement (770 per annum). Folgate Estates are fully supportive and committed to maximising the delivery of housing on Site through co-location with other non-residential uses (as per Criteria B) in order to create a mixed, inclusive community in line with Draft Policy H6 relating to housing choice and mix.

It is noted that the draft allocation and wider Local Plan policies (specifically Draft H1 and H2) place an emphasis on the delivery of "*permanent self-contained homes*", which are identified as having the greatest potential to provide for a variety of household types, and non-self-contained housing



products are considered to “provide less flexibility for alternative occupiers and can create a greater risk between people with different cultures and lifestyles” (paragraph 7.10).

Given the scale of the Site and the quantum of homes sought, it would be entirely appropriate to diversify the range of housing types provided to include build to rent, co-living, student accommodation, and specialist accommodation which would provide for multiple demographics and contribute towards mixed communities. This would be consistent with a number of London Plan policies which promote various types of non-self-contained housing products such as Policy H16 Large-scale purpose-built shared living (Sui Generis), Policy H13 Specialist older persons housing and Policy H15 Purpose Built Student Accommodation.

#### Criteria A – Intensify Industrial Provision and Capacity

Any proposed development at the Site is required to “intensify industrial provision to increase, or at least maintain, industrial, storage and warehousing capacity”.

The GLA have recently consulted on supplementary guidance on this matter (Industrial Land and Uses LPG Consultation Draft dated December 2023). Folgate Estates have submitted separate representations to this consultation regarding this matter, which we also enclose.

As set out in those representations, it is recognised that industrial floorspace capacity is commonly measured as Gross Internal Area (GIA), including mezzanine space, and this should be the starting point for any consideration of providing industrial floorspace at the Site. The GLA LPG also looks to introduce further guidance which states that on sites with significant levels of open storage, the calculation of capacity is informed by taking an average plot ratio from a wider industrial area. This definition could have serious implications for existing industrial sites with low intensity industrial or open storage use, such as Murphy’s Yard, which are allocated for future redevelopment. As drafted, the definition does not necessarily take into account site specific considerations which may inform and explain the level of intensity on any given site. In the case of the Murphy site this includes three sides of the site with operational railway boundaries, constricted access into the site, a need for Network Rail to maintain access through the site to the rail lines, as well as non-designated heritage assets. Accordingly, the guidance could result in a significant increase of the notional capacity and therefore the industrial quantum sought through any future application. This would consequently limit the amount of other land uses and local plan objectives from coming forward on site.

On this basis, this methodology for defining industrial capacity should not be applied rigidly when considering future requirements for intensification on industrial site and/or allocated industrial sites. A wider assessment of the site context, market, and character should also be considered on a site-by-site basis when forming conclusions around the realistic operational capacity for a site. The quality of such space and potential for additional employment generation should also be a key consideration for any assessment of capacity, where a decrease in industrial floorspace may be acceptable if it is replaced by a higher quality and intensified employment uses.

It is also recommended that the allocation recognises that the Site is not expected to provide industrial floorspace beyond the existing quantum as part of any future mixed use redevelopment. Furthermore, light industrial will be an appropriate form of industrial use to be re-provided on the Site given the context of the local area and placemaking aspirations of any future masterplan.

#### Allocated Use and Criteria A –Employment Uses

Folgate Estates support the aspiration to deliver a significant quantum of employment uses on Site. Given the scale of opportunity for development at the Site and huge demand for high-quality and well



connected floorspace in the borough, it is considered that there is the potential for a genuine mix and array of employment uses that will enable both substantial placemaking and public benefits. On this basis, the proposed allocated use of the Murphy Site allocation should be broadened to allow for the widest amount of suitable employment uses as defined at Paragraph 9.8 of the Plan, as well as supporting retail and community uses.

This should specifically include for office and research/development uses as well education and healthcare floorspace. Any such floorspace would likely be highly successful from both a masterplan placemaking and demand perspective, linking the Site into the Knowledge Quarter and emerging cluster of employment and cultural uses in Kentish Town more widely. None of these potential uses should be discounted at this stage.

Life sciences should also be encouraged at the Site, recognising there is significant demand and opportunity within Camden according to the Employment Land Review 2023 evidence base document. Both the education sector and healthcare sector provide functions that are complementary to and support the objectives of the knowledge sector, and these uses should be encouraged to come forward in this location where they can positively contribute to the economic function of the masterplan, wider area, and are positively justified.

#### Allocated Use – Absence of Leisure Uses

The allocation should be broadened to allow for a wider range of uses given the Site's scale and scope to provide significant development, linking several areas of different character. This will also be an important place-making factor in order to deliver a dynamic and successful neighbourhood which the plan aspires for – enabling places for people to work, live and enjoy. The inclusion of hotel and leisure uses (e.g. cinema) are therefore encouraged, which would serve as complementary uses alongside other employment and residential uses mentioned above. This broadened scope will also allow for the development to respond to community demands over the period of the phased development.

#### Criteria C – Affordable Workspace

Folgate Estates support a vision that provides affordable and start up spaces on Site and agree with the wider policy position that achieving social inclusion can take various forms and occur in diverse spaces, and workspace which benefits smaller businesses is not necessarily only beneficial when limited to discounted rates. Given the quantum of workspace likely to come forward at the Site a bespoke and creative affordable/specialist workspace strategy will be required to make a meaningful provision, and these policies should remain flexible and not prescribe specific quanta or discount rates in order to allow for an appropriate strategy to be agreed through any future masterplan application. Suitable floorspace should also specifically include “specialist” workspace.

#### Criteria E – New Office Floorspace

The need for contextual spaces in both form in function is recognised and acknowledged as a key principle of successful placemaking. However, the statement in the draft allocation that “*Large floorplate ‘corporate’ offices are unlikely to be considered suitable*” is not adequately defined nor justified. This statement should be removed in the Site allocation in line with the Regis Road and Highgate Studios allocations, and any such proposals would be required to be assessed in the normal way on their own merits and based on relevant market evidence and an assessment of how they form part of any masterplan and the wider area.



### Criteria G – Housing Needs

The potential inclusion of wider housing type needs identified by Policy H6C, including Extra Care housing and supported housing for people with learning disabilities is welcomed. However, as noted earlier in these representations, this should also include for other identified housing needs such as purpose built student accommodation and co-living, which also count towards meeting housing need targets. The ability for future development to provide supported or extra care housing as part of the overall affordable housing provision will need to be assessed as part of financial viability testing undertaken as part of any future application and will be subject to design considerations as well as an assessment/understanding of the demand for such uses.

### Criteria L – Incomplete

This section appears to be incomplete due to formatting error. Based on the format of the other Site Allocations, including the neighbouring Allocation Ref: C2 (KT2) 'Regis Road and Holmes Road depot' of similar scale and context, the equivalent text for the Murphy Site should presumably say the following:

*“The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 45 m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.”*

If this is the case, Folgate Estates acknowledge the approach taken for each Site Allocation and welcome the approach that the acceptability of particular tall building proposals will be assessed on a site-by-site basis. Including the recognition that there is the potential for additional height above the identified height range in some locations of the Murphy Site, subject to townscape view testing.

### Criteria M – Pedestrian and Cycling Links

The aspiration for increased connectivity across the Site and to/from neighbouring Sites is fully supported. It is noted however, that there are references in both the Site and Regis Road and Holmes Road Depot Allocation C2 (KT2) to facilitate a link across the railway line to link both of the Sites. It must be recognised that the land required to deliver this aspiration is not entirely within Folgate Estates' ownership and the ability to deliver such a structure will rely on the outcomes of discussions with third parties and detailed feasibility and cannot be guaranteed. The need for Network Rail to continue to be able to access and maintain their operated land is also a fundamental consideration to the feasibility of any over-rail structures in this location.

The delivery of the Site should not therefore be tied to or subject to land outside of Folgate Estates' ownership and control. This remains a crucial consideration for development at the site and policy should recognise that the ability to deliver connectivity aspirations is not solely in their control.

### Infrastructure contributions

Folgate Estates recognise and support the ambitions for securing wider infrastructure improvements such as new bridges to improve connectivity (Criteria M); highway improvements (Criteria N); and train station public realm and accessibility improvements (Criteria O). However, this needs to be balanced with deliverability and viability considerations, including prevailing CIL rates which remain



exceptionally high in this location (and in comparison to other large-scale allocations) which should be acknowledged in the Site Allocation and Local Plan policies.

### **Policy C1 - Central Camden [Sub Area]**

#### Part O

This limb lists out the key infrastructure priorities to support the delivery of development in Central Camden. As noted above, Folgate Estates recognise and support the ambitions for securing wider infrastructure improvements, and this needs to be carefully balanced with deliverability and viability considerations, including prevailing CIL rates which remain exceptionally high in this location (and in comparison to other large-scale allocations) which should be acknowledged in the Site Allocation and Local Plan policies.

It is noted that the allocation makes reference to the delivery of the 'Health Line' at Part iv, which formed part of the previous application at the Site and also commentary within the KTPF. Folgate Estates support the principle of maximising the delivery of green space as part of any future masterplan, it is important that it is not a specific requirement for it to be provided as one linear space, as an alternative proposal may better support any revised masterplan vision and still provide a meaningful route between Kentish Town and Gospel Oak.

### **Chapter 7: Meeting Housing Needs**

#### Policy H6 – Housing Choice and Mix

Policy H6 'Housing Choice' Part C sets out that as part of a proposed development of a site with an area of 0.5ha or greater it will be expected to make provision for service plots for self-builders.

Whilst the need to provide opportunities for self-builders is appreciated, it is crucial to acknowledge that this policy may not be suitable for transformative masterplan site allocations, such as the Murphy Site. For example, implementing this policy could impede the Site's intensification for high-density employment uses as mandated by other policy requirements. It is therefore encouraged this policy is applied flexibly and on a site-by-site basis.

### **Chapter 8: Responding to Climate Change**

Folgate Estates supports the delivery of exemplary sustainable development and targets for net zero carbon and the vision for the Murphy Site will be underpinned with meaningful objectives to achieve this.

#### Policy CC1 and CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings

While the principle of this policy is supported in order to meet the UK's Net Zero objectives, a retrofit first or only approach is unlikely to be suitable for large strategic sites as it would hinder the ability to fully optimise the Site and meet Local Plan objectives. In the case of the Murphy Site, the Site comprises locally listed railway sheds alongside a cluster of smaller, low-quality structures with limited lifespans, the full retention of which would not likely align with a high quality and intensified masterplan aspirations. Therefore, the policy position must acknowledge that, in certain instances, demolition is the only route to achieve these objectives including the transformation and intensification of strategic allocations.



## Policy CC4 – Minimising Carbon Emissions

Part A (ii) of Policy CC4 sets out embodied carbon targets for non-residential developments. This should be in accordance with the latest relevant GLA Guidance (i.e Whole Life-Cycle Carbon LPG) for consistency.

Whole Life-Cycle Carbon Assessments for new industrial floorspace should also take into consideration that they are often more carbon intensive than other uses. This includes the associated embodied carbon as well as operational carbon, where more materials are often required for their construction in order to meet the relevant environmental standards such as acoustic and vibration mitigation. This will be particularly relevant where industrial uses are co-located with residential uses as proposed for the Murphy Site. On this basis, decision making should also take into account of deliverability and viability considerations developments face, on balance with Whole Life-Cycle Carbon Assessments to prevent carbon intensive uses such as the required industrial floorspace from coming forward.

## **Chapter 9: Delivering an inclusive economy**

### Policy IE3 – Industry

Part VI of Policy IE3 requires “*The need to complete the employment element of mixed-use schemes at an early stage in the construction programme*”. This should be applied flexibly on strategic sites where detailed long-term phasing plans will be produced, and a phasing strategy to ensure appropriate delivery of land uses agreed as part of the applications.

### Policy IE4 - Affordable and specialist workspace

While Folgate Estates support the inclusive economy and provision of affordable workspace at the Murphy Site, Part A (ii) of Policy IE4 currently relates to ‘gross’ additional floorspace rather than ‘net’. The policy should be amended accordingly as this could disincentivise the delivery of developments, particularly if the existing floorspace is let and income producing. It is relevant to note that during the recent Islington Local Plan Examination the Inspectors concluded in their July 2023 report that the proposed affordable workspace policies within the draft Local Plan needed to be based on net rather than gross to ensure the policy was justified. Consequently, that policy (B4) is based on net additional employment space, rather than gross space.

As set out above, the type and quantum of such space should be considered on a site by site basis based on the development proposals and how the benefits of affordable and specialist workspace can be maximised. Accordingly, the requirement of 20% of floorspace to be provided at 50% of market rent for a period of 15 years set out in part A (ii) should be treated as a starting point to enable detailed discussions on a case by case basis and not be rigidly applied.

### IE5 – Visitor accommodation and hotels

Strategic sites such as the Murphy Site have the ability to create a new character for an area and a broader mix of uses may be appropriate to enable better placemaking and meet the community’s needs. We suggest that wording is added to this policy to reflect that such uses can be acceptable where specified in site allocations or in relation to strategic sites.

## **Chapter 10: Supporting Camden’s Communities**

### Policy SC4 – Food Growing

The requirement of 0.9 sqm on site per person for onsite food growing opportunities is likely to be highly onerous for strategic sites with a number of competing requirements. This policy should



therefore be applied flexibly and reductions accepted where justified, and in the context of the holistic provision of open and community spaces.

## **Chapter 12: Design and Heritage**

### Policy D2 Tall Buildings

Folgate Estates support the recognition within this policy (and its supporting text and diagrams) that the Site is appropriate for tall buildings – defined as 30m or more in this context. The assessment criteria in part C makes reference to the delivery of affordable housing as a benefit which can help to justify tall buildings. The specific reference to 50% should be removed and emphasis placed on whether proposals maximise the supply of affordable housing as part of any application, which will reflect that is likely to be a multitude of constraints and pressures placed on development. The provision of affordable housing may also be part of a wider package of public benefits, which should also be taken into consideration in the assessment of tall buildings.

## **Chapter 14: Safe, Healthy and Sustainable Transport**

### Policy T2 – Prioritising walking, wheeling, and cycling

Part B (vi) of Policy T2 requires developments to “contribute towards new bridges and bridge improvement works where appropriate (e.g., over railways and the Regents Canal)”. This should be revised to be subject to viability, feasibility and operational considerations as per our earlier comments in these representations.

### **Site Allocation C5 (KT5) – 369 – 377 Kentish Town Road**

Separate representations have been made on behalf of Folgate Estates in regard to Draft Site Allocation C5 (KT5) known as the ‘Carwash’ at 369 – 377 Kentish Town Road. The neighbouring site is also owned by Folgate Estates which has permission for its redevelopment for a mixed use 14-residential scheme (Ref: 2019/0910/P). This site should be considered on its own merits and vice versa.

### **Summary**

Thank you for the opportunity to be included as part of your vision for the future plans for the borough. Folgate Estates support the direction of travel for the Local Plan and remain committed to the delivery of a comprehensive masterplan vision at the Site. Given the size and complexity of the Site, any future masterplan will need to balance various priorities and pressures to deliver a significant quantum of development. This includes consideration to multiple land uses, a multi-year phasing and build period, access constraints, interfaces with operational railway land together with the aspiration to provide significant public benefits through a comprehensive redevelopment of the Site. Accordingly, policies must remain balanced in order to facilitate long-term delivery at the Site with sufficient flexibility to enable detailed consideration at the application stage. We look forward to collaborating closely with the Council and the local community to deliver on the Site's significant potential for a once in a generation opportunity to create new, dynamic mixed-use neighbourhood.

We trust our comments will be taken on board in progressing the New Local Plan and we look forward to continuing to engage further with you in the future. Please do not hesitate to get in touch with Alexandra Milne or Nona Jones should you have any further queries.



Yours sincerely,

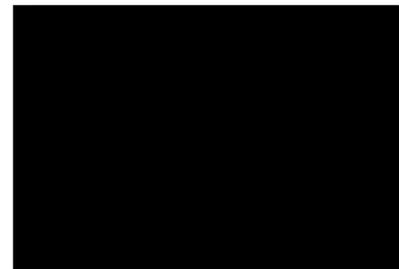


**DP9 Ltd.**

[REDACTED]  
28 February 2024

The Planning Team  
Greater London Authority

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



By email to [REDACTED]

Dear Planning Policy Team,

## London Plan Guidance – Industrial Land and Uses Consultation

Thank you for the opportunity to comment on the Industrial Land and Uses London Plan Guidance (“LPG”) Consultation Draft dated December 2023.

These representations are submitted on behalf of our client, Folgate Estates Limited, who own the majority of the 6.23 hectare Murphy’s Yard site in Kentish Town within the London Borough of Camden (“the Site”), the entirety of which is believed to be a deliverable development opportunity. The Site is a designated Locally Significant Industrial Site (“LSIS”) which has an emerging site allocation (Ref: C3 (KT3)) in the Draft Camden Local Plan 2024 for an employment-led mixed use development to create a new vibrant, sustainable new mixed-use area, including circa 750 new homes.

### Background

By way of background, an outline planning application for the comprehensive redevelopment of the Site was previously submitted to the London Borough of Camden by Folgate Estates in January 2022 (Ref: 2021/3225/P). The application was subsequently withdrawn in May 2022 in order to allow additional time to consider matters raised by officers and consultees. Nevertheless, Folgate Estates remain committed to delivering an exciting and unique masterplan at the Site.

The Site has also previously, as part of the aforementioned application, been subject to a number of detailed land use discussions with the GLA, and arriving at the appropriate balance of industrial floorspace alongside other requirements, namely for the provision of a significant quantum of residential use, remains fundamental for the delivery of a successful masterplan on Site.

The Industrial Land and Uses LPG along with adopted London Plan industrial policies has and continues to be highly relevant to any emerging proposals for the Site. Our representations therefore focus on its impact on the delivery of Murphy’s Yard and Sites of similar scale/nature.



## Section 2 – Definition of Industrial floorspace capacity

It is recognised that industrial floorspace capacity is commonly measured as gross internal area (GIA) and excluding mezzanine space. The LPG definition at paragraph 2.1 introduces further text relevant to sites with little existing industrial floorspace, stating that:

*“On a site with little existing industrial floorspace, including on sites that have significant levels of open storage, the calculation of capacity is informed by the average plot ratio for a representative wider industrial area (such as the whole Strategic Industrial Location (SIL) or industrial area the site is located in); or wider geographies such as the borough or sub-region”.*

This definition could have serious implications for existing industrial sites with low intensity industrial or open storage use, such as Murphy’s Yard, which are allocated for future redevelopment. As drafted, the definition does not necessarily take into account site specific considerations which may inform and explain the level of intensity on any given site. In the case of the Murphy site this includes three sides of the site with operational railway boundaries, constricted access into the site, a need for Network Rail to maintain access through the site to the rail lines, as well as non-designated heritage assets. Accordingly, the guidance could result in a significant increase of the notional capacity and therefore the industrial quantum sought through any future application. This would consequently limit the amount of other land uses and local plan objectives from coming forward on site.

On this basis, this methodology for defining industrial capacity should not be applied rigidly when considering future requirements for intensification on industrial site and/or allocated industrial sites. A wider assessment of the site context, market, and character should also be considered on a site-by-site basis when forming conclusions around the realistic operational capacity for a site. The quality of such space and potential for additional employment generation should also be a key consideration for any assessment of capacity, where a decrease in industrial floorspace may be acceptable if it is replaced by a higher quality and intensified employment uses.

The statement at paragraph 3.4.4 which sets out considerations for LPA’s strategies for industrial capacity seems to recognise this, stating

*“Provision of the required level of adequate industrial capacity considering type, quantum, quality and phasing. This includes the following: Generally providing at least the existing level of industrial floorspace, unless an alternative specific approach is set out in the Local Plan. However, it is not only the floorspace as such that should be considered, but also the type and quality of the provided space, including operational yard space.”*

Consideration of existing industrial floorspace, how it is used, and its overall quality should be a starting point for applying policies relating to retention and potential intensification should be reflected throughout the document.

It is noted that operational yard space requirements should be taken into account, and further clarity is needed on the relationship between yard space and the plot ratio requirements when assessing capacity.

## Section 3.3 – Identifying industrial supply

The provision of additional guidance (as set out in Section 5.3) in order to help inform the consideration of industrial proposals is supported. However, the requirement that *“Industrial developments should only count towards industrial floorspace capacity if they broadly meet the*



*indicative building design advice set out in the Section 5.3*” at paragraph 3.3.2 is restrictive and subject to interpretation. Strict adherence to the design guidance should not be required as it inevitably cannot anticipate each and every potential configuration, especially where spaces are designed with occupiers in mind who may have their own, specific operational requirements. Whether industrial proposals count towards meeting capacity requirements should be left to decision makers to ultimately decide.

### Section 3.5 – Approach to Class E

Folgate Estates agree with the LPG’s approach to acknowledging the role that Class E uses, specifically those withing Class E(g)(ii) and (iii) can play in contributing to industrial functions (at paragraph 3.5.2). These uses can also contribute meaningfully when it comes to placemaking benefits and support future flexibility, particularly as it pertains to strategic sites.

Paragraph 3.5.4 (bullet point 3) suggests that Local Authorities could seek to secure that Class E industrial uses would only be acceptable where it is ancillary to the main industrial use. On large sites this could significantly hinder the successful operation of a range of industrial uses, and does not align with the principle at 3.5.2 which recognises that Class E(g)(ii) and (iii) use can provide meaningful industrial floorspace in their own rights. This potential limitation should therefore be reconsidered and standalone Class E uses supported as part of a comprehensive industrial strategy where considered appropriate as assessed on a site by site basis.

### Section 4.2 - Criteria-based screening guidelines

Opportunities for intensification should consider how sites can provide qualitative improvements to industrial floorspace and not solely be fixed to a consideration of increasing floorspace quanta or capacity. Qualitative improvements could including a range of metrics, for example, employment generation and economic output which are not specifically tied to operational space, which should be supported where an industrial strategy aligns to market considerations and a site’s prevailing context. This is particularly relevant to large strategic and mixed use sites allocated for co-location alongside a significant provision of industrial uses.

Criteria 5 of paragraph 4.2.5 asks LPAs to consider how/whether *“the type and mix of existing industrial businesses could operate effectively in co-location setting, particularly where their retention is important to meet local industrial and infrastructure functions”*. The need to ensure, where possible, the ability of existing industrial uses to continue to operate is recognised, but the type of existing industrial uses at a site should not be a limiting factor when considering whether co-location, possibly through the introduction of more sensitive industrial uses, would be acceptable on a site. Policy should provide flexibility for the type of industrial floorspace reprovided through any mixed use redevelopment to take account of a range of factors, including the existing situation as well as the emerging.

Paragraph 4.2.6 recognises that masterplan led approaches and Development Plan Document reviews can be used to identify where co-location can be appropriate. This should also include reference to site allocations identified in Local Plans in line with paragraph 4.3.3.

### **Summary**

We trust our comments will be fully considered in progressing the Industrial Land and Uses London Plan Guidance and we look forward to continuing to engage further with you in the future.



Please do not hesitate to get in touch with Alexandra Milne or Nona Jones should you have any further queries.

Yours sincerely,



**DP9 Ltd.**

Date: Thu, 26 Jun 2025 18:32:34 +0000  
From: Dilip Lakhani  
To: PlanningPolicy  
Subject:

---

Dear Camden Planners

I live at Nr [redacted address] [redacted postcode] and am writing to you in support of the proposed Nature Corridor mentioned in the policies listed below:

Policy Number

Policy C1, paragraph 19 for Central Camden

Policy N1 paragraph 7 for North Camden

This proposal is already supported by a number local community groups and we wish to add our individual support for this thoughtful project.

We do understand the need for increased housing in the area, but also believe in the importance of adequate and well thought out and designed green space throughout any new building developments.

This ingenious plan has the benefit of providing continuous green spaces which will both support biodiversity as well as the health and well being of people living locally. This plan has the advantage of linking these principles throughout a number of areas and proposed developments.

Developers will always use the words 'green spaces' and 'well being' but we put our faith (and hope!) in Camden, as the planning authority, to ensure that there is genuine and adequate adherence to the clearly thought out plans integral to the proposed Nature Corridor.

Yours sincerely

Dilip Lakhani .

Sent from my phone.

Date: Thu, 26 Jun 2025 18:55:12 +0000  
From: Dee Searle  
To: PlanningPolicy  
Subject: Draft local plan 2025

---

We live at [redacted address], [redacted postcode] and would like to make two specific positive contributions to the consultation.

1) We wish to support the proposed Nature Corridor mentioned in the policies listed below:  
Policy C1, paragraph 19 for Central Camden  
Policy N1 paragraph 7 for North Camden

This proposal is already supported by a number of local community groups and we wish to add our individual support for this thoughtful project.

We do understand the need for increased housing in the area, but also believe in the importance of adequate and well thought out and designed green space throughout any new building developments.

This ingenious plan has the benefit of providing continuous green spaces which will both support biodiversity as well as the health and well being of people living locally. This plan has the advantage of linking these principles throughout a number of areas and proposed developments.

Developers will always use the words 'green spaces' and 'well being' but we put our faith (and hope!) in Camden, as the planning authority, to ensure that there is genuine and adequate adherence to the clearly thought out plans integral to the proposed Nature Corridor.

2) We also wish to support the retention of the Regis Road recycling centre. We note that in the consultation on Regis Road last year retention of the recycling centre came second out of 20 for the infrastructure developments that people selected when asked for their top five priorities.

However, we strongly request that no vehicular access to the recycling centre is from Holmes Road, which would be completely unsuitable for this kind of traffic, given that it has substantial housing and a heavy footfall of pedestrians to and from two schools (St Patrick's and CFBL), student halls of residence, studios and the Stay Club. This footfall is likely to increase with the advent of the new hotel planned above McDonald's. Vehicular access from Regis Road would be far safer and more suitable.

We also request that the vacant Section House site is used as the location for the recycling centre (rather than the Police Station car park), because this would lessen the impact on the existing residences, schools and businesses on Holmes Road and would be easier for users to access.

Kind regards

Dee Searle  
Mike Sumner

Date: Thu, 26 Jun 2025 19:04:06 +0000  
From: Vesna Cudic  
To: PlanningPolicy  
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road  
(Gypsy And Traveller Site) Of Draft Local Plan.

---

Dear Madam / Sir,

I am writing to you regarding the above proposal. [redacted text]  
I would like to express my objections to the proposed allocation of Site C27 for Gypsy and Traveller accommodation for the following reasons:

Here are my objections:

- The site is a long-established green space and currently managed as part of the “Communi-trees” community greening initiative. It’s used as play and communal space, by families who live in Constable House. Loss of green space would affect children and elderly in the neighbourhood.
- The site is 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.
- The site is a flood risk. It’s frequently covered by stagnant surface water and as such unsuitable for Highly Vulnerable Use. Traveller pitches are considered a “Highly Vulnerable Use” under Planning Practice Guidance, therefore the site is not suitable.
- The site is very small and lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access, therefore the site is not adequate.
- The neighbourhood around Chalk Farm tube station is already a densely populated area. It is also an area of high footfall (especially on the weekends when it gets incredibly crowded with people going to and from Primrose Hill, and in the evenings with the concert goers going to and from the Roundhouse).

I hope you will consider my objections. I look forward to hearing from you.

Kind regards,

Vesna Cudic

Responder 432

Date: Thu, 26 Jun 2025 17:04:18 +0000  
From: Asne Faber  
To: PlanningPolicy  
Subject: See below

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Re Gypsy and Traveller Site - by Chalk Farm tube - site allocation C27

Dear Sirs

I am amazed that you even suggest this site at Eton Court Road next to Constable House to become a Traveller site as it is totally unsuitable for this purpose. Firstly it is too small and no doubt would spread outside, also no green fields

This site is in the middle of residential area with a school nearby and should be used to build affordable housing which is desperately needed.

Also the area needs revitalising like small supermarket or other businesses .

I therefore have to express my strong objection to this plan.

Yours faithfully  
Mrs. A Faber  
[redacted address]  
[redacted postcode]

Responder 433

Date: Thu, 26 Jun 2025 19:30:48 +0000  
From: rob barlay  
To: PlanningPolicy  
Subject: Gypsy traveller site

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Dear Sir/Madam

We have just been made aware of these proposals meaning there has been no proper consultation. Why weren't we emailed or posted some relevant communication.

The area is not suitable for this kind of development. It's within a quiet social area, near a school, close to a recently replanted nature area and close to nearby amenities which will clearly be severely impacted.

What possible sense does it make to locate such a "development" here

And to reiterate, why wasn't there a meaningful consultation period and proper review of the proposals. This is simply railroading a planning application without understanding the local community needs, desires and respect.

We strongly object and demand proper consideration and consultation

Sincerely

Rob Barlay

Sent from my iPhone

Date: Thu, 26 Jun 2025 19:32:03 +0000  
From: Lara Hammoud  
To: PlanningPolicy  
Subject: Camden Local Plan: Objections to Site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)

---

**My personal details in case you would like to contact me:**

Name: Lara Hammoud

[redacted]

[redacted]

Email address: [redacted email]

**I, alongside other residents of the area, strongly object to the proposed local site C27 to be converted to a gypsy and traveler site.**

**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

**The reasons for my objection:**

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.

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

Regards,

Lara Hammoud, LL.L



Date: Thu, 26 Jun 2025 19:47:37 +0000  
From: Janice Barlay  
To: PlanningPolicy  
Subject: Gypsy site proposal NW3 behind Chalk Farm tube

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Dear Sir/Madam

We have just been made aware of these proposals meaning there has been no proper consultation. Why weren't we emailed or posted some relevant communication.

This is not at all sensible!!

The area is not suitable for this kind of development. It's within a quiet social area, near a school, close to a recently replanted nature area and close to nearby amenities which will clearly be severely impacted.

What possible sense does it make to locate such a "development" here

And to reiterate, why wasn't there a meaningful consultation period and proper review of the proposals. This is simply railroading a planning application without understanding the local community needs, desires and respect.

We strongly object and demand proper consideration and consultation

Sincerely

\*\*\*\*\*

Janice Barlay

Date: Thu, 26 Jun 2025 19:48:21 +0000

From: Kelvin Saul

To: PlanningPolicy

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

---

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

Why I am objecting to the proposed plans:

- The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of residents of Constable House and the wider area particularly in such a dense urban location
  - It is also an important Local Green Space /Open Space with mature trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers as part of the Communi-Trees project involving KOKO Foundation, Think & Do and Camden Council. Aside from providing a patchwork of orchards across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting. It would also involve the removal of substantial numbers of mature holly trees between 30 and 60 depending on the exact site.
  - The area was constructed and is used as a play area for the residents of Constable House. If the site was developed, this facility would be lost without any substitute.

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

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

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

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

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

Regards

Kelvin Saul

[redacted address], 

[redacted postcode]

Date: Thu, 26 Jun 2025 20:01:42 +0000  
From: James Stephens  
To: PlanningPolicy  
Subject: OUTLINE OF OBJECTION/REPRESENTATION

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

---

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

#### REASONS

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

Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of Provost Road; to the west by residents of the 6 storey Etons and will also be overlooked by the new residential block under construction on land at 5-17 Haverstock Hill; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

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

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

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

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

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

#### Conclusion

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

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

Date: Thu, 26 Jun 2025 20:16:54 +0000  
From: Rhys Giles  
To: PlanningPolicy  
Subject: Camden Local Plan – Proposed Submission Draft 2025 Representation

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Hello,

Apologies for not completing the form as I don't have a printer, but I believe that the plan for more traveller sites is sound in every way, and support it wholeheartedly.

Thank you.

Arthur Rhys Giles  
[redacted address]  
[redacted] [redacted postcode]

Date: Thu, 26 Jun 2025 20:40:43 +0000  
From: Philipp Orgler  
To: PlanningPolicy  
Subject: Consultation gypsy and traveller site at Constable House, Belisze Park

---

Dear Sir / Madam

I have seen the notification about a proposed Gypsy site next to Constable House in Belize Park / Chalk Farm.

My name is Philipp Orgler. I would like to make the following comments please

- the proposed site (currently used as a playground) is actually rather prone to flooding. I have seen on multiple occasions in the past that after strong rains the site would be under (deep) water for days, and sometimes even for weeks. Therefore I don't think it would be a safe place for people to live there. To be honest, I am rather worried about that and it is a real concern for me, and that's why I cannot support this proposal.

Apart from that,

- I would much more like to see the area developed into a nicer playground area
- there are widespread concerns about the lack of sanitary facilities should a community start living in that area
- it is a rather traffic heavy are and doesn't seem particularly suitable to settle for a community

With best regards

Philipp Orgler

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

My name is David Vladimir

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 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,  
Vladimir

Date: Thu, 26 Jun 2025 20:49:33 +0000  
From: Laurie Frey  
To: PlanningPolicy  
Subject: Representations concerning Camden Local Plan - Proposed Submission Draft 2025

---



**OUTLINE OF OBJECTION/REPRESENTATION:**

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

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

**REASONS:**

The Camden Local Plan Proposed Submission Draft:  
(1) Does not comply with the duty to cooperate; and  
(2) Is not sound: (a) It has not been positively prepared; (b) it is not justified taking into account reasonable alternative; (c) it is not effective; and is not consistent with national policy.

**DETAILS OF REASONS:**

Amenity space associated with housing estate: 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 created as a play area for the residents of Constable House and is used as a place 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 were developed, this facility would be lost without any substitute. There are no alternative sites available nearby.

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

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

Access and disruption to adjoining residents: 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.

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

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

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

**CONCLUSION - PROPOSED MODIFICATION:**

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.**

**I ALSO WISH TO BE ADDED TO THE CONSULTATION DATABASE TO BE NOTIFIED:**

- (1) when the Camden Local Plan has been submitted;
- (2) when the Inspector's report is published; AND
- (3) when the Camden Local Plan is adopted.

**Submitted:**

**Jessica L Frey**

**26 June 2025**

Date: Thu, 26 Jun 2025 20:50:47 +0000  
From: Francine Marmot  
To: PlanningPolicy  
Subject: Objection to traveller site next to Chalk Farm station.

---

Could you please register my objection to the planned gypsy site on the following grounds :

this is planned for an already crowded area 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 these works.

- It's in 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 lacking in privacy.

- It will mean the loss of green space and a playground for the residents of Constable House.

- It will have a knock-on impact to the local community and Primrose Hill, and in particular for the policing of these areas.

there would be a lack of proper hygiene facilities.

Thank you for your attention to my objection.

Best regards

Francine marmot  
[redacted address]

[redacted] pc [redacted]

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

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

E-mail: [planningpolicy@camden.gov.uk](mailto: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="HANNAH"/>	<input type="text"/>
Last Name	<input type="text" value="DOUGLAS"/>	<input type="text"/>
Job Title (where relevant)		<input type="text"/>
Organisation (where relevant)		<input type="text"/>
Address Line 1*		<input type="text"/>
Address Line 2		<input type="text"/>
Post Town*		<input type="text"/>
Post Code*		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

Part B – Please use a separate page for each representation

Name or Organisation: HANNAH DOUGLAS

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

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

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

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

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

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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.

This proposal does not enhance the local area and is a poor use of ground for a very limited amount of accommodation.

There are much more worthy housing solutions which could facilitate a greater no. of families.

(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.

A proposal that offers an enhancement of the current site facilitating the needs of the existing community. eg. either a public service or a greater volume housing solution.

(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.

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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

*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:  Date: 26/6/25

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#### 1. Personal Details\*

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*\*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="KEVIN"/>	<input type="text"/>
Last Name	<input type="text" value="JOHNSON"/>	<input type="text"/>
Job Title (where relevant)		<input type="text"/>
Organisation (where relevant)		<input type="text"/>
Address Line 1*		<input type="text"/>
Address Line 2		<input type="text"/>
Post Town*		<input type="text"/>
Post Code*		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

# Camden Local Plan – Proposed Submission Draft 2025 - Representation Form

## Part B – Please use a separate page for each representation

Name or Organisation:

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

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Paragraph  Policy  Policies Map

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Poor use of land in prime residential housing location with proximity to underground, when there is a complete lack of public services in that vicinity.

(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.

Proposal with realistic implementation of something that will serve the needs of the local population. Housing crisis ongoing, this proposal provides such limited accommodation. A much more robust solution needed.

(Continue on a separate sheet if necessary)

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11. Signature: [REDACTED] Date: 26<sup>th</sup> / 6 / 25

Date: Thu, 26 Jun 2025 22:05:53 +0100  
From: Victoria  
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)

Dear Camden Council Planning Policy Team,

[redacted] in the [redacted] [redacted]

I want to object to the proposed allocation of Site C27 Land East of Constable House, [redacted postcode] for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).

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

### **1. Loss of Valued Community Amenity Space**

The site is a long-established, well-used informal green space historically utilised as an open kickabout area and passive amenity for residents of Constable House and the wider estate. It is currently managed as part of the "Communi-trees" community greening initiative. While not formally designated as open space, the site clearly meets the functional criteria for Local Green Space designation and is used as informal play and communal space, particularly by families in high-density flats without access to private outdoor areas. Its redevelopment would significantly erode amenity provision and contribute to a deficit of accessible green space, especially affecting children and elderly residents. The loss would be contrary to:

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

### **2. Overlooking and Loss of Privacy**

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

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

### **3. Flood Risk - Unsuitable for Highly Vulnerable Use**

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

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

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

### **4. Access Constraints and Undeliverability**

The site lacks independent, adoptable vehicular access. It is served by narrow estate roads and pedestrian paths unsuited to large vehicles, trailers, or emergency service access. Deliverability is therefore highly questionable. This constraint breaches key policy requirements: - Manual for Streets (DfT, 2007) - minimum access width standards; - PPTS Paragraph 13(b) - sites must be accessible and deliverable; - Equality Act 2010 - provision must not create unequal or unsafe conditions for any group.

In addition, the proposed site is located very close to the busy Chalk Farm tube station entrance, which serves as a primary access point for commuters and schoolchildren. Adding a gypsy/traveller site with vehicle access-often involving larger vehicles or caravans-could significantly disrupt foot traffic and increase congestion in this already high-density area.

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

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The 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:

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

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

Best regards,

Victoria Kashuba

Date: Thu, 26 Jun 2025 22:12:42 +0100

From: Pippa Nisbet

To: [redacted]

Subject: Camden Local Plan Proposed Submission Draft - Reps on behalf of UCLH  
NHS Foundation Trust

---

[redacted]

[redacted] is an Employee Owned Trust

[redacted] cted postcode]

Sign up to our regular [redacted] bulletin

This message is intended for the addressee only and may contain private and confidential information or material which may be privileged. If this message has come to you in error you must delete it immediately and should not copy it or show it to any other person. HGH Consulting is a trading style of Hepar Grincell Limited. Registered in England & Wales: 9340687. Registered address: [redacted address], London, [redacted postcode].

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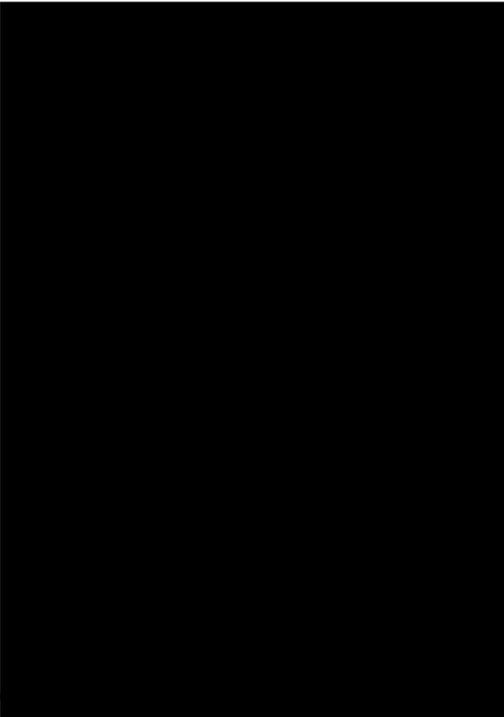
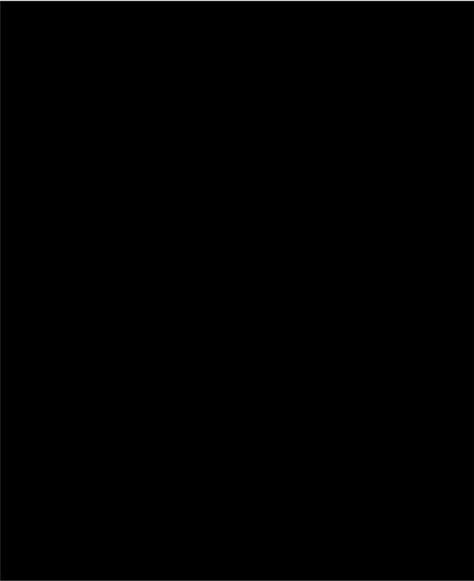
Before completing this representation form please refer to the attached guidance notes.

## 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" value="Mrs"/>
First Name	<input type="text" value="Diana"/>	<input type="text" value="Pippa"/>
Last Name	<input type="text" value="Kootstra"/>	<input type="text" value="Nisbet"/>
Job Title (where relevant)	<input type="text"/>	
Organisation (where relevant)		
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone Number		
E-mail Address		

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

**Part B – Please use a separate page for each representation**

**Name or Organisation: UCLH NHS Foundation 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		Policy	SC3		Policies Map	
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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	
(2) Sound	Yes			No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>		No	

\*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)	<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)		
(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.

This representation is made on behalf of our client, UCLH NHS Foundation Trust. With regard to policy SC3 (Social and Community Infrastructure) specifically, our client supports the general objectives of the Council to work with its partners to ensure that social and community infrastructure is developed and modernised to meet the changing needs of Camden’s communities and support the delivery of services. It is noted however that part D.1.a of policy SC3 (Protection of existing Social and Community Infrastructure) states the following:

“To safeguard social and community infrastructure in Camden, the Council will:

1. ensure existing social and community infrastructure is retained, recognising their benefit to the community, including protected groups, unless:

a. a replacement facility is provided. Any facility must be of at least equivalent quality, quantity and accessibility to that of the existing facility, and must meet the needs of the local population, or its current, or intended users; or” (our emphasis)

UCLH provides world leading acute and specialist services across six hospitals located in the London Borough of Camden and it also occupies a number of non-clinical facilities within Camden including residential, office and laboratories. UCLH’s mission is to deliver top-quality patient care, excellent education and world-class research. UCLH is one of only two UK hospitals ranked in the world top 50, and several of its specialisms – including neurology, neurosurgery and urology, consistently rank in the top ten in the world. It also hosts the second largest biomedical research centre in the NHS, and its close relationship with UCLH enables it to translate research into life changing treatments for patients.

UCLH is continually exploring opportunities to develop new healthcare and research services to both improve patient care and contribute to the UK’s ambition of becoming a global leader in science and technology. One of its key strategic aims in achieving this is to maximise the use and value of its existing hospitals and facilities, as well as to agree its approach to investing in its older buildings (e.g. National Hospital for Neurology and Neurosurgery). To ensure it can meet its aims, on occasions this may necessitate the need to develop new healthcare facilities where these provide a more efficient option.

To achieve its ambitions, UCLH need to consider how to transform patient pathways, its digital infrastructure and its physical estate. New estates projects will focus on maximising efficiency and ensuring integration of services so that ideal adjacencies are achieved enabling digital transformation and futureproofing to adapt to changes in services and requirements over time.

The needs of patients and the healthcare system continues to change, and UCLH need to respond to this evolving context. The UK has an ageing population, with many people living with multiple long-term conditions; there is an increasing understanding of and focus on reducing health inequalities; and the NHS has constrained revenue and capital funding. Advances in technology are changing how healthcare is accessed alongside the changes to working patterns for staff, accelerated by the pandemic.

For these reasons, it is vital to enable changes where required to UCLH's estate to ensure the continued successful operation of its facilities. Policy SC3 D.1.a. appears overly prescriptive in seeking any replacement facility to "be of at least equivalent quantity to that of the existing facility." It is likely in planning for future development and upgrades of the UCLH estate that there will be occasions where quantity of replacement facilities does not equate to existing, and providing the same quantity would not deliver the most suitable option. This is as a direct result of improved efficiencies, technology, ways of working, national priorities and the needs of our population.

It is noted that para 10.56 of the supporting text to policy SC3 does suggest a degree of flexibility in that it states, "The Council will expect replacement facilities to be of a sufficient size and design quality to facilitate the successful operation of the community use" but it is considered that any flexibility should be defined more clearly within the policy itself.

Camden's Infrastructure Delivery Plan (IDP) April 2025, which forms part of the Local Plan's evidence base, states in chapter 10 that, "The NHS is a key enabler of change to respond to service transformation and changing workforce and digital requirements." It also states that "A review of the primary care estate in 2024 found that around 60% of patients in Camden are being served from good quality, future-proof estate that aligns with clinical and estate priorities. A further c.25% of patients are served from premises considered to be acceptable, though with some shortcomings. About 15% of patients are using facilities which are not deemed fit for purpose and should be phased out as alternative estate becomes available."

This evidence within the IDP points to the need for flexibility to ensure that UCLH is able to respond to changing requirements to its services and working practices, and move towards ensuring that patients can be served from good quality, rather than sub-standard premises.

With regard to national planning policy, para 86 states that "Planning policies should: e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."

Para 127 also notes that "Planning policies and decisions need to reflect changes in the demand for land" and para 128 states that "Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs." Part b) of para 128 states that local planning authorities "should support proposals to: .... "make more effective use of sites that provide community services such as schools and hospitals,

provided this maintains or improves the quality of service provision and access to open space.”

In line with the recognition of the importance of the NHS Estate as a key enabler to service transformation and changing requirements, the need to continue to improve levels of care, and the need set out in national policy to ensure planning policies are flexible enough to respond to change, it is considered that policy SC3 should be more flexible in requiring ‘equivalent quantity’ of any replacement facility. With changes to working practices, technology and needs - in certain cases, freeing up some existing sites used for healthcare could enable optimisation of sites for alternative uses and opportunities for redevelopment of more efficient facilities of reduced floorspace elsewhere. Policy SC3 needs to ensure appropriate flexibility to ensure that it does not hinder UCLH’s estate requirements.

(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.

With regard to section 6 above, we suggest that policy SC3 is amended at part D.1.a. as below (changes shown as underlined).

“To safeguard social and community infrastructure in Camden, the Council will:

1. ensure existing social and community infrastructure is retained, recognising their benefit to the community, including protected groups, unless:
  - a. a replacement facility is provided. Any facility must be of at least equivalent quality, quantity (other than where a reduced quantity can still demonstrate successful operation of that facility), and accessibility to that of the existing facility, and must meet the needs of the local population, or its current, or intended users; or”

Amendment of this policy as suggested above will help to ensure it achieves the flexibility required by national planning policy, optimisation of sites and the ability to respond to changing circumstances. Based on relevant national policy and evidence, this will ensure the policy is justified and consistent with national policy.

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

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

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

	No	x		Yes
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9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

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

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

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

**Privacy Notice**

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

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

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

11. Signature:	PL Nisbet	Date:	26 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.

Date: Thu, 26 Jun 2025 22:15:43 +0100  
From: Martin Nelson  
To: [redacted]  
Subject: RE: Site C27 - Land East of Constable House, Adelaide Road

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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 write in objection to the site proposed for Gypsy and Traveller accommodation at Constable House, Eton College Road, asking you to consider four points by email rather than formal consultation form.

- The small site replaces a playground, an important resource for neighbourhood recreation. Opportunities for outdoor play has been in steep decline for decades and urgently needs to be reversed.
- The KOKO Foundation has a Communi-Trees initiative on the site, which would certainly be impacted. An important Camden business is paying back to the community with an environmental project – to have it summarily curtailed at best, ruined at worst.
- The safety and peace of both the traveller and the wider community would be compromised at this busy and open location, which is very close to the crucial pedestrian access to Primrose Hill from Chalk Farm Tube station via Bridge Approach opposite. This carries great volumes of people at weekends, but a steady stream of workers and residents to and from Primrose Hill – including the vulnerable – at all times, until last trains late at night.
- The other site proposed for Travellers is at Freight Lane – a completely different sort of site, admirably suited to purpose, being safe and secure with excellent amenities close by. Your mapping in the FAQ document has no scale, but the two sites are of a completely different nature. I am forced to make guesstimates, but Constable House site 27 is but a few metres in size (35m x 25m max?), whereas Freight Lane's allocated site is at least 300m long! Even with mixed development, there should be ample room to accommodate Travellers in the one site.

Kind regards

Martin Nelson FRGS

Date: Thu, 26 Jun 2025 21:22:28 +0000  
From: PG  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: OUTLINE OF OBJECTION/REPRESENTATION

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[REDACTED]  
Telephone [REDACTED]

Email address: [redacted email]

#### OUTLINE OF OBJECTION/REPRESENTATION

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

#### REASONS

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

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

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

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

Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

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

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

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

Conclusion

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

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

Best regards,  
Philip Gottschalk

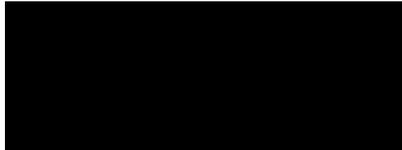
Date: Thu, 26 Jun 2025 22:26:12 +0100

From: Ena Martinovic

To: [redacted]

Subject: Outline of Objection/ Representation to Local Gypsy/Traveler Site

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#### OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed - Delete Site Allocation C27: Land adjacent to Constable House, Adelaide

Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

#### REASONS

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

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

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

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

Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

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

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

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

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

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

Conclusion

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

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

Best wishes

Ena Martinovic

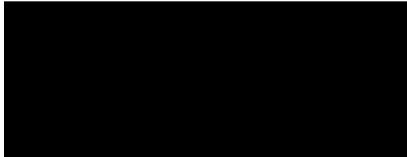
Date: Thu, 26 Jun 2025 22:27:36 +0100

From: Fred Jal

To: [redacted]

Subject: Outline of objection/ Representation to Local Gypsy/ Traveler Site

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#### OUTLINE OF OBJECTION/REPRESENTATION

Modification Proposed Delete Site Allocation C27: Land adjacent to Constable House, Adelaide

Road for Gypsy and Traveller accommodation

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

#### REASONS

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

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

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

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

Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

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

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

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

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

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

#### Conclusion

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

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

Best wishes  
Frederic Jallot

Date: Thu, 26 Jun 2025 22:34:26 +0100

From: Penny Tompkins

To: [redacted]

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

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

From:

Penny Tompkins

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] and am registering my objection 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.

I request the removal of Site C27 from the Plan on the grounds that its allocation is unsuitable.

A summary of my objection is as follows:

**1. The size of the site.** It seems very few pitches could be fitted on such a small site making it unviable especially as it is unclear how access to the site would be achieved given the current configuration of streets. It even seems that the Traveller community don't like the proposal and fear losing their current accommodations (<https://www.camdencitizen.co.uk/2025/04/17/camden-travellers-anxious-plans-long-awaited-sites>).

**2. The loss of a long-established green space.** It has been scientifically established that green spaces in cities are vital for the physical and mental well-being of residents. Removal would be contrary to Government, regional and local planning guidelines.

**3. The loss of a community amenity space including a play areas for young people.** This goes against Government, regional and local planning guidelines.

**4. The lack of privacy** due to overlooking from nearby buildings as well as the number of pedestrians and cars that pass by the site each day. The lack of privacy would be felt by the travellers, and residents of Constable House and the Etons alike.

**5. Lack of transparency and consultation in site selection.** There has been very little notification of these plans, explanation of how the decision was arrived at, and as far as I am aware, no consultation with local residents. This runs counter to the council stated aim for transparency and consultation in planner matters.

To conclude, I request that Site C27 be removed from the Camden Local Plan on the grounds that its allocation is unsuitable and contravenes many established local, regional and national planning policies.

Please acknowledge receipt of this email and keep me informed of any further developments related to this proposal.

Kind regards

Penny Tompkins

Date: Thu, 26 Jun 2025 22:46:29 +0100  
From: Will And Ade Hassan-Hayles  
To: [redacted], [redacted], [redacted], [redacted]  
Subject: SUBJECT: Draft Local Plan - Objection to Site Allocation C27 (Gypsy And Traveller Site)

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My name is William Hayles [redacted] (NW3) with my wife Ade and five-year old son. We live near the proposed site.

We 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,

Will and Ade

William Hayles



23<sup>rd</sup> June 2025

Petition to Oppose the Allocation of the Constable House Play Area for Use as a Gypsy and Traveller Site

To: Councillor Callahan and Camden Council ([planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)) and Camden councillors and Camden Council.

From: The Residents of Bridge House, Constable House, and the Surrounding Community

**We, the undersigned, strongly oppose the proposed allocation of the play area adjacent to Constable House for use as a Gypsy and Traveller site.**

This area currently serves as a vital community space for local families, children, and residents, and we believe that its removal would cause irreversible harm to the wellbeing, safety, greening, social cohesion and character of our neighbourhood.

**Our Objections Are Based on the Following Grounds:**

1. **Loss of a vital public amenity:** The play area is the only safe outdoor space for children and families from Constable House.
2. **Loss of vital green infrastructure:** Its removal would remove a vital local lung, in breach the Camden Local Plan policies protecting open and recreational space and green ecological assets.
3. **Environmental and structural safety risks:** The land is known to have ground instability and water table issues, including past structural failures at Constable House.
4. **Increased traffic and infrastructure strain:** The area already suffers from congestion, and additional traffic would endanger pedestrians and worsen emergency access. There is already a large current new development being constructed on the site surrounding Chalk Farm Station.
5. **Loss of community cohesion and safety:** Local residents already have the manage the intrusions as recently reported to police at Bridge House. The impact of an itinerant community will exacerbate the practical and stressful challenges of keeping existing residential properties safe and secure.
6. **Lack of community consultation:** Residents have not been properly informed nor consulted, contrary to the Council's responsibilities under local governance law.
7. **Adverse impact on residential amenity and property values:** The proposed alteration in the character of the area and reduction in quality of life would significantly impact on the value of properties in which people have invested, limiting their ability to move as their life circumstances change.

We request that Camden Council reconsider this proposal and retain the play area for continued public use or explore alternative sites that do not compromise existing residential infrastructure and wellbeing.







NAME		Date
Andriatic		25/6/25
WILL GARDER		25/06/25
JUSTINA OPPA		25.06.25.
Viola Saues		25.06.25
Luette Portinari		25.06.25
ella Boke		25.06.25
LUCHATINER		25.06.25
ANDREW BIER		25.06.25
JOKEE DINDA		25.06.25
FRANCO JOHN		25.06.2025
Lucas W. Das		25.06.2025
C-SCHARSCHI		25.6.2025
F-LAFFRAY		25/6/25
M. C. ...		25/6/25
A. CARRIERE		26/06/25.
V. GAUCHER		26/6/25
N. JANA		26/06.25
S. FMU		26/6/2025
Wen Tai Li		26/6/2025
Kai Cheng		26/6/25
Christophe ...		26/6/25
Amela Birtal		26/06/2025
Grady ...		26/06/2025
Nicolas ...		26.6.2025
ORU ...		26.06.25
SUMIT N-O		26/06/25
AMAN SINGH		26/6/25
RVAIRI ...		26/6/25
ONRAED ...		26/6/25
Danny Hylen		26/6/25
Nip ...		26/6/25
Lisa Portinari		26/6/25
F.J. Portinari		26/6/25

Date: Thu, 26 Jun 2025 23:02:17 +0100

From: miranda royston

To: [redacted]

Subject: Objection to Site Allocation C27 – Land East of Constable House

---

Dear Planning Policy Team,

I am writing to object to the proposed allocation of Site C27 (land adjacent to Constable House, Adelaide Road) as part of the Camden Local Plan.

As a local resident, I have serious concerns about the impact this development would have on the area and the people who live here:

- **Community space:** This plot has become a hub for local engagement through the planting of fruit trees and wildflowers as part of the Communi-Trees project. Removing it would undo valuable community work and cut off a rare example of successful local involvement.
- **Children's playground:** The site is used regularly by local children as an informal play area. There is no obvious alternative nearby. Taking it away would leave children without a safe outdoor space.
- **No consultation:** There has been no meaningful communication with residents about this proposal. It feels like a decision made without local input or understanding of how the space is used.
- **Disruption and access:** The proposed site entrance is directly opposite homes and would worsen congestion and noise. Increased traffic would affect everyone living nearby, especially families and older residents.

This space serves an essential community purpose, and its loss would be deeply felt. I urge Camden Council to remove Site C27 from the Local Plan.

Kind regards,  
Miranda Royston

Date: Thu, 26 Jun 2025 23:09:09 +0100  
From: Amba Royston  
To: [redacted]  
Subject: Formal Objection to Site C27 – Land East of Constable House

---

Dear Planning Team,  
[Redacted]

This proposal would remove a space that means a great deal to local residents for several reasons:

- Community benefit: This land has recently been planted with fruit trees and wildflowers as part of a youth-led community project. It has created a rare sense of shared ownership and pride among residents.
- Children's play: It's a much-needed, informal play space for local kids. There is nothing else nearby that's safe and accessible, and this development would wipe that out completely.
- No real consultation: Residents were not consulted in a meaningful way. It feels like a decision was made behind closed doors, without understanding how valued this space really is.
- Disruption to the area: Increased traffic and access directly opposite homes would create ongoing disruption, noise, and risk, especially to families and older neighbours.

Please remove Site C27 from the plan. The space is far more valuable in its current use than it ever could be as a building site.

Yours faithfully,  
Amba Royston

Date: Thu, 26 Jun 2025 22:15:28 +0000  
From: Sally  
To: planningpolicy@camden.gov.uk  
Subject:

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Name: Sally Stephens

[REDACTED]

[REDACTED]

Email address: [redacted email]

#### OUTLINE OF OBJECTION/REPRESENTATION

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

Site C27 should be deleted from the following:

Chapter 4 Central Camden: Table 5

Chapter 7: Meeting Housing Needs: Policy H11

Draft Policies Map and Schedule of Proposed Local Plan Site Allocations

## REASONS

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

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

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

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

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

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

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

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

improved sport and leisure facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii) enhance greening and biodiversity, and (iv) deliver flood mitigation measures and sustainable drainage systems.

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

### Conclusion

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

I wish to participate at the examination hearings into the Draft Local Plan before the Inspector Sent from my iPhone

[REDACTED]

[REDACTED]

Email address: [redacted email]

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#### Conclusion

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

Sarah Lister-Fell

Responder 458

Date: Fri, 27 Jun 2025 05:49:50 +0000  
From: Jodie Perry  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: Traveller Site Chalk Farm

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

Kind Regards,

Jodie Perry

Date: Fri, 27 Jun 2025 06:13:21 +0000  
From: Elliott Smith  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: Camden Local Plan: Objections to Site C27 - Land East of Constable House, Adelaide Road (Gypsy & Traveller Site)

Dear Camden Council Policy Planning Team,

I'd like to formally object to the inclusion of Site C27 in the Camden Draft Plan and request its removal from the following:

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

This modest plot of land holds considerable importance for local residents, visually, socially, and practically.

Its proposed development raises a number of serious concerns that, in my view, make it wholly unsuitable for allocation:

- Heavy pedestrian use and lack of tranquillity: Located adjacent to Chalk Farm station and on a main pedestrian route to Primrose Hill, this site is in constant use. The area experiences high levels of foot traffic and noise, leaving little sense of peace or refuge.
- Significant privacy concerns: The site is overlooked on all sides by residential blocks including Constable House, the Etons, homes on Provost Road, Primrose House, Bridge House, and a recently built block on Haverstock Hill. Any residential development here would be exposed to hundreds of nearby windows and surrounded by roads and a rail line, offering no privacy or sense of sanctuary for future occupants—particularly families.
- Loss of one of the area's last green pockets: This space represents one of the few remaining green areas in our immediate neighbourhood. Removing it would contribute further to the ongoing loss of natural space in a heavily developed, densely populated area.
- Destruction of community initiatives: Local young people recently helped plant fruit trees and wildflowers here as part of the CommuniTrees project. Allocating the land for development would erase this effort and undo valuable community-driven progress.
- Impact on children's play opportunities: Local children, especially those from Constable House and nearby homes, use this space as an informal play area. There is no obvious alternative nearby that offers the same accessibility or safety for outdoor play.
- Inadequate site access and potential disruption: The proposed access route is directly across from residential buildings, posing risks to traffic flow and raising concerns for both local residents and potential future occupants. The surrounding streets are narrow, with limited turning space, which could hinder emergency service access.
- Flood risk: This location has a history of flooding, particularly around the play area. Building here may increase water-related issues both for the site itself and surrounding properties.
- Unclear planning for local services: There appears to be no indication that school places or other essential services have been factored into the proposal, raising concerns about how new residents would be accommodated.
- Lack of consultation: Local residents have not been meaningfully consulted about this site's potential development. Given the direct impact it would have on the community, this omission is troubling.

In light of these concerns, I urge you to revise the Draft Local Plan and remove Site C27 from the proposed allocations. The land provides irreplaceable value to the community and should be preserved, not developed.

Date: Fri, 27 Jun 2025 06:39:40 +0000  
From: Daniel Winston  
To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
Subject: Planning comment - Adelaide Road / Chalk Farm

---

The suggestion of taking green space and making it a permanent traveller site is a disgrace. There can be no justification for providing land for this community.

Camden Council has shortlisted the green space east of Constable House (Adelaide Rd & Eton College Rd) as a permanent Traveller site: [link to council page](#).

To be honest, I don't understand the reasoning behind allocating dedicated land to this group. I, like most residents, am not given parcels of land simply because of my heritage or lifestyle. If we're going down that route, why not offer land to other groups-French citizens, for example? The logic, or lack of it, is baffling.

Why here?

Central London is already at a premium for space. Surely, if the council is intent on providing land for travellers, it should be looking at areas outside the city centre, where pressure on green space isn't so acute. Central London should be for everyone's enjoyment, not carved up for the benefit of one community.

A Permanent Site for Travellers?

Isn't that a contradiction in terms? If travellers are happy travelling, why the need for a permanent site? This isn't about accommodating a lifestyle-it's about imposing a solution that doesn't make sense for the community or the travellers themselves.

Let's be clear:

Green spaces are vital for everyone. They're rare, precious, and irreplaceable. Converting them for any group's exclusive use is unfair and sets a dangerous precedent. Camden should be protecting these spaces, not handing them over.

In summary:

- Loss of public amenity: Green space is already scarce in Camden.
- No justification for exclusive use: Why this group and not others?
- Central London is the wrong place: There must be better options outside the city centre.
- Contradiction in terms: A permanent site for travellers?

Really?

- Planning policy and precedent: This undermines protections for green space and community assets.

Camden should reconsider and find a solution that works for everyone, not just a select few.

Regards

Daniel Winston

Date: Fri, 27 Jun 2025 07:05:12 +0000  
From: CAINE, Baroness  
To: planningpolicy@camden.gov.uk  
Subject: FW: Regis Road Area Guidance Supplementary Guidance March 2025 - Location of Recycling Centre

---

Good Afternoon ,

I write on behalf of myself and my husband Roy Lockett who are residents of [redacted address] to strongly oppose the proposed relocation of the recycling centre . I would be grateful if you could confirm receipt of this and it having been sent to you before the deadline for responses to the Supplementary Guidance .

Given that Camden Council, after the first consultation, made relocation of the amenity a central condition of moving forward with planning permission it should, in our view, have featured strongly at the beginning of this Supplementary Guidance and be subject to the same level of public consultation as earlier iterations. It has only come to the attention of residents in the area very recently and sadly has raised much discussion regarding a lack of transparency on behalf of the Developers and Camden Council. We suggest that you may wish to think of ways to remedy this, by drawing it to the attention of immediate residents and offering a specific meeting to enable dialogue .

The proposed relocation is nowhere to be found in the sections at the front of the document a “ *Distinctive New Neighbourhood* “ or “ *High Street Transition* “ which talk about pocket green spaces and other positive pedestrian links to Holmes Road. Nor is it made clear in the section on the “ *Western Gardens and Holmes Road* “

Instead, it appears first on page 47 in the section “ *A Sustainable Neighbourhood* “ and only by closely following the key , do you finally find an orange blob, which identifies that it is going to directly back onto Holmes Road, an existing residential area and sits opposite the Primary School . It also reveals that the green pedestrian link that connects Holmes Road to Regis Road runs by the side of the proposed relocation . The only other mention appears as far as we can see on page 59 as number 14 in the list of infrastructure priorities .

Of all the residential roads in the area local to the Regis Development Area , Holmes Road is **most** in need of improvement by the opportunity afforded because of this development . Holmes Road is very piecemeal and run down and recent attempts to green it and start to repair pavements and, finally, put a drain in to stop the road flooding every time it rains, are welcome . As has been the trailblazing work on emissions and traffic calming which is so important for the safety and health of young children attending St Patricks. However, we have also had , in spite of local opposition, the planning agreement for the “ hotel “ above Mc Donalds at the end of the road and a great deal of noise generated by the big student population in student accommodation and living it up at the Stay Club

Placing the Recycling site so near to the High Street , literally backing on to Holmes Road and opposite the school, will add noise, (including for the new Hotel and the newly opened rooms above the Old Farmhouse restaurant affecting their businesses ) , air pollution from car traffic as well as smells and the possibility of rodent infestation. There are acres of

space on this site . The developers are carefully keeping the recycling centre away from any of the areas where new housing and new mixed commercial and housing developments are being proposed . They will be aware that residential property that is so close to one is not as attractive and does not command so much value.

Camden Council must surely be obliged to put the needs of existing tenants and homeowners( and Council taxpayers and voters ) as well as the local school ahead of maximising profit margins for the developers .

They have what is a prime location near the Heath with great transport links and Kentish Town itself . They have the wherewithal and the capital to rethink this unsatisfactory proposal

As it happens it is also not clear where the training and education spaces are going to be based for the National Film and Television School and the London Screen Academy . We think they may be the purple block of Buildings in the Western Gardens . We suggest they are moved from there ,creating more green space for Holmes Road /Grafton Road and existing students and instead are placed where the repositioned recycling centre is proposed creating a training and education zone..... and a place of inspiration ,as opposed to pollution, for the Primary School pupils opposite .

With best wishes

**Dinah Caine and Roy Lockett**

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Responder 462

Date: Fri, 27 Jun 2025 07:24:30 +0000

From: Gems, David

To: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Subject: Objection to relocation of Recycling Center to Police Parking space

---

Dear planning team,

I wish to object to a Camden recycling center on Holmes Road at the Police Station parking lot on the ground that is suggested in the Local Draft Plan consultation: the location so close to existing residents and a primary school - St Patricks - plus shops and restaurants at the high street is inappropriate and cause unnecessary pressure. It would devalue our properties, and bring dirt, vermin and noise nuisance into our area.

Holmes Road has recently suffered from much emerging noise nuisance, and despite an existing management plan, the Council does not monitor the situation on the ground properly, a recycling centre would lead to more unmonitored nuisance.

Kind regards

David Gems

Date: Fri, 27 Jun 2025 07:40:23 +0000  
From: Planning  
To: PlanningPolicy, Barry Dawson  
Subject: FW: Land East of Constable House

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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

Dear Planning,

I am writing in a personal capacity, rather than as [redacted] to object to inclusion of Site C27 in your plan as a possible site for Gypsy and Traveller accommodation.

The plan will have a direct but negative impact on everyone living in Primrose Hill, as all its inhabitants use Bridge Approach and the zebra crossing over Adelaide Road to access Chalk Farm Station.

On such a sensitive subject, I cannot believe that you have consulted properly. You have failed to bring the existence of the plan to the attention of those in Primrose Hill who will be affected by it.. A large number of those living in Primrose Hill, who would certainly have objected to the plan, are still unaware of the plan's existence. I myself only became aware of the plan earlier this week.

The expiry of the response period later today means that the residents of Primrose will effectively have been excluded from proper consultation on the plan and from any opportunity to object to it. This is completely unacceptable.

Yours faithfully,

Martin Sheppard

--

Martin Sheppard

[redacted address]  
[redacted]  
[redacted]

[\[redacted email\]](#)

Date: Fri, 27 Jun 2025 07:41:42 +0000  
From: Milos Jovicic  
To: planningpolicy@camden.gov.uk  
Subject: Site Allocation C27 – Land East Of Constable House, Adelaide Road  
(Gypsy And Traveller Site) Of Draft Local Plan

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I am a resident of one of the [redacted] was dismayed and alarmed to hear that the land east of Constable House has been proposed by the Council as gypsy and traveller accommodation.

It seems clear to me that this would be in nobody's interest and am therefore adding my voice to those who have already expressed protest. Below is a set of reasons why, in the opinion of the Residents Association with which I totally agree this is a very bad idea. For convenience and as a reminder, I paste the entire text below.

kind regards

Milos Jovicic [redacted]

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

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#### 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.

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#### 2. Overlooking and Loss of Privacy

The proposed use would result in a highly constrained site being hemmed in by existing multistorey residential blocks, including Constable House. The site is

directly and heavily overlooked from windows and balconies of neighbouring flats, as well as from Eton Hall, Eton Place, and Eton Rise immediately opposite, creating conditions unacceptable for both current residents and future site occupants.

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

- 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.

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### 3. Flood Risk - Unsuitable for Highly Vulnerable Use

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

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

- 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.

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### 4. Access Constraints and Undeliverability

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

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

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### 5. Unsound Site Selection Process and Lack of Transparency

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

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

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

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### 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).

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#### **Conclusion and Requested Action**

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

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

Date: Fri, 27 Jun 2025 10:11:38 +0200

From: Jodie Miles

To: [redacted]

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

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

Dear Camden Council Policy Planning Team,

I'd like to formally object to the inclusion of Site C27 in the Camden Draft Plan and request its removal from the following

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

This modest plot of land holds considerable importance for local residents, visually, socially, and practically.

Its proposed development raises a number of serious concerns that, in my view, make it wholly unsuitable for allocation:

Heavy pedestrian use and lack of tranquillity: Located adjacent to Chalk Farm station and on a main pedestrian route to Primrose Hill, this site is in constant use. The area experiences high levels of foot traffic and noise, leaving little sense of peace or refuge.

Significant privacy concerns: The site is overlooked on all sides by residential blocks including Constable House, the Etons, homes on Provost Road, Primrose House, Bridge House, and a recently built block on Haverstock Hill. Any residential development here would be exposed to hundreds of nearby windows and surrounded by roads and a rail line, offering no privacy or sense of sanctuary for future occupants particularly families.

Loss of one of the area's last green pockets: This space represents one of the few remaining green areas in our immediate neighbourhood. Removing it would contribute further to the ongoing loss of natural space in a heavily developed, densely populated area.

Destruction of community initiatives: Local young people recently helped plant fruit trees and wildflowers here as part of the CommuniTrees project. Allocating the land for development would erase this effort and undo valuable community driven progress.

Impact on children's play opportunities: Local children, especially those from Constable House and nearby homes, use this space as an informal play area. There is no obvious alternative nearby that offers the same accessibility or safety for outdoor play.

Inadequate site access and potential disruption: The proposed access route is directly across from residential buildings, posing risks to traffic flow and raising

concerns for both local residents and potential future occupants. The surrounding streets are narrow, with limited turning space, which could hinder emergency service access.

- Flood risk: This location has a history of flooding, particularly around the play area. Building here may increase water-related issues both for the site itself and surrounding properties.

- Unclear planning for local services: There appears to be no indication that school places or other essential services have been factored into the proposal, raising concerns about how new residents would be accommodated.

- Lack of consultation: Local residents have not been meaningfully consulted about this site's potential development. Given the direct impact it would have on the community, this omission is troubling.

In light of these concerns, I urge you to revise the Draft Local Plan and remove Site C27 from the proposed allocations. The land provides irreplaceable value to the community and should be preserved, not developed.

Thank you for taking the time to consider this submission.

Sent from my iPhone

**I submit this representation to object in the strongest possible terms to the proposed allocation of Site C27 – Land East of Constable House, NW3 3QA – for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19).** I respectfully request that the Planning Inspector 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.

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

Regards,  
Khilan Sonigra

**Constable House – representations**

**Representations need to be sent to the Planning Policy Team at Camden Council by 5pm on 27<sup>th</sup> June 2025**

*Your representations could be based on the text below, though please try to change/add/put elements in your own words to avoid identical submissions. The proposal in relation to Constable House is referred to as site allocation C27 in the Camden Plan.*

Please send your representations by email to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**Text:**

My grounds for objection is that NW3 is saturated with schools with 20 independents and 16 others - primary, secondary, faith schools, nurseries etc.,and they require sports and nature activities for pupils whose needs would collide with potential pitches for travellers in Central London of which NW3 is a part of.

I am familiar with a Camden-produced document ‘ Gypsy & Traveller Accommodation Needs Assessment’ August 2014 (available online) that states that this policy pursues aspirational targets rather than responding to actual requirements.

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

**PERSONAL DETAILS**

Name: [  Marie Hines ]

  
 |  


**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**

- **Access to nature.** Proposed site would remove access to nature for local residents as well as pupils attending 36 local schools.
- **Amenity space associated with housing estates.** The site forms part of the surrounding open space/amenity area for use by Constable House and other local residents. The proposed use of the site would be a serious loss to the amenity of

residents of Constable House and the wider area – particularly in such a dense urban location

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

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

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

## **Conclusion**

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

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

*[Note: if you indicate here that you wish to be heard, you can always change your mind later! We will probably be encouraged to do this jointly]*

Responder 468

Dear Sir/Madam,

**Re: Site C27 of the Draft Camden Local Plan – Land East of Constable House, Adelaide Road (Gypsy & Traveller site)**

I submit this representation on behalf of the New Etons Residents Association (NERA), which represents the residents and owners of Eton Hall, Eton Place and Eton Rise, an estate of 365 flats located on Eton College Road NW3, directly opposite the proposed site.

For the reasons outlined below, we are of the firm opinion that the allocation of Site C27 fails multiple policy tests and lacks a transparent or defensible basis. Furthermore, we believe its allocation to be unsound on the grounds that 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).

We therefore respectfully request that it be removed from the Camden Local Plan Proposed Submission Draft (Regulation 19) and that the Council and Inspectorate revisit alternative, more appropriate sites through a transparent, community-informed process.

## **OUTLINE OF REPRESENTATION**

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

The playground area at the site was constructed as a play area for the residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute and would be detrimental to the young using the area.

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

This 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 and would, without question, cause serious disruption to the residents of Constable House.

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.

The fact that local residents – including of The Etons and Constable House – seemed to be completely unaware of the proposal until very recently speaks to a lack of transparency and failure to properly consult affected residents, which 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.

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

## **7. Inconsistent with other policies in the draft Camden Plan**

The proposal of this site is inconsistent with other policies in the draft Camden Plan, namely:

- To provide new and/or improved sport and leisure facilities for young people;
- To deliver new and enhanced areas of open space and play space, as well as improved access to nature;
- To enhance greening and biodiversity; and
- To deliver flood mitigation measures and sustainable drainage systems.

## **8. 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).

## **MODIFICATION PROPOSED**

We propose the deletion of “Site Allocation C27: Land adjacent to Constable House, Adelaide Road for Gypsy and Traveller accommodation” from the following elements of the draft Camden Plan.

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

Furthermore, we propose that the playground area at the site be converted into a proper play space for use by the residents of Constable House and other local residents. The addition of an outdoor gym, some swings, a climbing frame and a roundabout would make infinitely more sense than what is currently being proposed.

## **PARTICIPATION IN THE EXAMINATION HEARINGS**

I wish to participate at the examination hearings in order to ensure that the interests and views of the residents and owners of the 365 flats in The Etons are faithfully represented.

We thank you in advance for according our representations the appropriate level of attention.

Yours faithfully,

Guy Morris

New Etons Residents Association

Date: Fri, 27 Jun 2025 09:38:00 +0100  
From: Fursey Costello  
To: [redacted]  
Subject: Camden basement planning policy consultation

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**CONFIDENTIALITY NOTICE** This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s) please note that any distribution, copying or use of this communication or the information in it is strictly prohibited. Any views or other information in this communication which do not relate to our business are not authorized by us, nor does this communication form part of any contract unless so stated.

**CYBERCRIME AND FRAUD OUR BANK ACCOUNT DETAILS WILL NOT CHANGE**

Criminals are using sophisticated methods to steal money and routinely intercept and modify legitimate emails. Be vigilant as to changes (however minor) in email addresses, when opening emails/attachments or clicking on links and always be suspicious when your bank account details are requested. If you receive communications advising that our bank account details have changed, do not make any payments and speak to the person dealing with your matter immediately. We will not accept responsibility if you transfer funds into the wrong account.

# 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](mailto: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="Fursey"/>	<input type="text"/>
Last Name	<input type="text" value="Costello"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Organisation	<input type="text"/>	<input type="text"/>
Address Line 1*	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation: Noble Structures 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](#)

Paragraphs	C3, C4, D, E3, 12.131, 12.141, 12.142, 12.143, 12.144, 12.145	Policy	D6 Basements	Policies Map	
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**4.** Do you believe the Camden Local Plan Proposed Submission Draft is:

(1) Legally compliant	Yes		No	
(2) Sound	<del>Yes</del>		No	X
(3) Complies with the Duty to co-operate	Yes		No	

\*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)	Yes
(2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	Yes
(3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	Yes
(4) Consistent with national policy	Yes

\*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.

I am writing to state my support for the representation submitted by the Association of Specialist Underpinning Contractors (ASUC) - *ASUC Representation on Camden Local Plan Proposed Submission Draft - 27 June 2025*

I agree with the objections made and the support given in the ASUC representation regarding Policy D6 Basements

I would like to add that our company employs up to 80 people who work in the sector with annual turnover of £9.8m

The restrictions proposed in Policy D6 Basements would have a significant negative impact on my business. It would likely lead to people losing their jobs.

I ask that the ASUC representation is given full weight, bearing in mind the negative impact on employment for my business and other businesses, and therefore on the broader economy.

(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.

I support the modifications to Policy D6 Basements proposed in the ASUC Representation.

(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

No

Yes

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

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

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

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

**Privacy Notice**

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

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

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

<b>11. Signature:</b>	<b>Fursey Costello</b>	<b>Date:</b>	<b>26<sup>th</sup> June 2025</b>
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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.

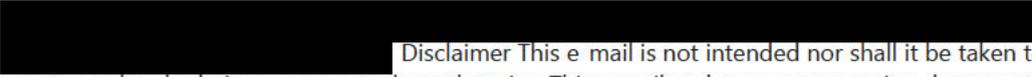
Date: Fri, 27 Jun 2025 08:58:02 +0000

From: Daniel Fleet

To: PlanningPolicy@camden.gov.uk

Subject: NHSPS Response - Camden Local Plan Regulation 19 Consultation

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 Disclaimer This e mail is not intended nor shall it be taken to create any legal relations, contractual or otherwise. This e mail and any accompanying documents are communicated in confidence. It is intended for the recipient only and may not be disclosed further without the express consent of the sender. Please be aware that all e mails and attachments received and sent by NHS Property Services Ltd are subject to the Freedom of Information Act (2000) and may be legally required for disclosure to the public domain. NHS Property services Ltd is registered with the Information Commissioners Office and will hold and process all personal data fairly, transparently and in accordance with the law. Further information can be found on the website at <https://www.property.nhs.uk/privacy policy/>

# 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](mailto: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="Daniel"/>	<input type="text"/>
Last Name	<input type="text" value="Fleet"/>	<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"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

**Part B – Please use a separate page for each representation**

Name or Organisation: **NHS Property Services**

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" 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" value="X"/>
(4) Consistent with national policy	<input type="text"/>

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

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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.

Draft Policy SC3 Part D seeks to protect existing social and community infrastructure which includes health facilities.

NHSPS supports the provision of sufficient, quality community facilities and the wording of the Policy that requires one of the two tests to be met but does not consider the proposed policy approach to be positively prepared or effective in its current form. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient

care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of redundant or no longer healthcare suitable sites and properties for best value (open market value) is a critical component in helping to fund new or improved services within a local area. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that the facility is no longer required to meet the needs of the local population and this would satisfy Policy SC3 Part D(1) under criteria (a). To ensure the Plan is positively prepared and effective, NHSPS are seeking the following addition (*shown in italics*) to Draft Policy SC3 or its supporting text at Para 10.56 – 10.58 to ensure the principle of alternative uses for NHS land and property will be fully supported:

*Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will satisfy Policy SC2 Part D(i)(a) and there will be no requirement to retain any part of the site in an alternative community use or require evidence of marketing.*

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.

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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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<b>11. Signature:</b>		<b>Date:</b>	
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# Notes to accompany the Representation Form

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Date: Fri, 27 Jun 2025 10:04:16 +0100  
From: Lucy Sandler  
To: [redacted]  
Subject: Travellers Site Allocation C27

---

As an [redacted]  
Road, [redacted postcode] I write to respectfully object to the proposed allocation of Site C27 - Land East of Constable House, Adelaide Road for Gypsy and Traveller accommodation within the Camden Local Plan Proposed Submission Draft (Regulation 19, 2025). I ask that this representation be considered as part of the Regulation 19 consultation and 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

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

With thanks for your consideration,

Lucy Freeman Sandler, PhD, FSA, FRHistS

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the first letter of the name.

Lucy

Date: Fri, 27 Jun 2025 11:18:22 +0200  
From: Lisa Murphy  
To: [redacted]  
Subject: Camden council Traveller site near Chalk Farm

---

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

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

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

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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.

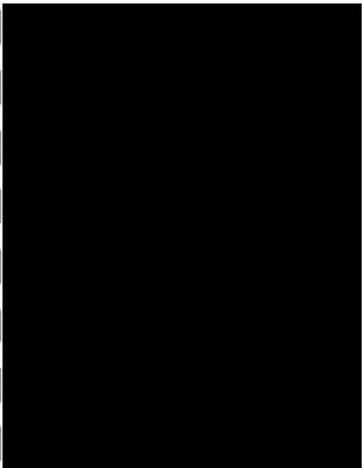
Before completing this representation form please refer to the attached guidance notes.

### Part A – Submit only one copy of this

#### 1. Personal Details\*

#### 2. Agent's Detail

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

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

**Part B – Please use a separate page for each representation**

Name or Organisation:

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

Documents can be found at the following links:

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

Paragraph  Policy  Policies Map

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

(1) Legally compliant	Yes	<input style="width: 80px;" type="text" value="dont know"/>	No	<input style="width: 80px;" type="text"/>
(2) Sound	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" type="text" value="no"/>
(3) Complies with the Duty to co-operate	Yes	<input style="width: 80px;" type="text"/>	No	<input style="width: 80px;" type="text" value="no"/>

\*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="1"/>
(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"/>
(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"/>

\*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.

(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

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 i	
(c) when the Camden Local Plan is adopted	y

#### 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

For further information regarding how we store a Notice [privacy-notice-planning-feb-2025](#).

<b>11. Signature:</b>	Lisa Murphy	<b>Date:</b>	26/6/25
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# Notes to accompany the Representation Form

## 1. Introduction

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

## 2. Legal Compliance and Duty to Co-operate

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

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

- The Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the [Local Development Documents](#) (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's [Statement of Community Involvement](#) (SCI). The SCI sets out the council's strategy for involving and the revision of community 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 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.

OBJECTION RE: Camden Local Plan, Proposed Site Allocation C27

**Land adjacent to Constable House, Adelaide Road (Traveller accommodation)**

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

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

- 1) The site lies in an amenity area enjoyed by many local residents as a precious local green open space with flowers and many trees, including recently planted fruit trees. It is vital that Camden protects the few open spaces it has still remaining as essential environmental lungs for the Borough and its residents.
- 2) The site was preserved as a playground for residents of Constable House and should be protected as such.
- 3) There is insufficient space in this part of Camden to accommodate new residents and traffic which would undoubtedly be created by travellers and their vehicles accessing the site.
- 4) The area is densely populated already with large historic mansion blocks and new apartments.
- 5) a gypsy and traveller site is totally inappropriate and totally unacceptable

Julian Bier

Date: Fri, 27 Jun 2025 10:35:23 +0100

From: John V-S

To: [redacted]

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

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Name: John Vohryzek-Samuel  
[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

1) 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

2) It is also an important Local Green Space /Open Space with mature

trees and wild flowers: the green space has in the last few months been planted with a number of fruit trees and an area of wild flowers

as part of the Communi-Trees project involving KOKO Foundation, Think

& Do and Camden Council. Aside from providing a patchwork of orchards

across Camden, the scheme involves local young people who are appointed to look after the trees. The proposal in relation to this site would involve the complete removal of the Communi-Trees planting.

It would also involve the removal of substantial numbers of mature holly trees -

between 30 and 60 depending on the exact site. .

3) Playground: the area was constructed as a play area for the

residents of Constable House, and is used as a play space. It has historically been identified on OS Maps as a playground and now serves as a play area for Constable House and local residents. If the site was developed, this facility would be lost without any substitute. There are no alternative sites available nearby. Why not refurbish the playground ?

4) Overlooking: The site is overlooked on all sides. To the east by residents of 4/5 storey Constable House; to the north by residents of

Provost Road; to the west by residents of the 6 storey Etons and will

also be overlooked by the new residential block under construction on

land at 5-[redacted address]; and to the south by residents of Primrose House and Bridge House Adelaide Road. Adelaide Road which adjoins the site to the south is a key east west route and busy bus route with implications for the privacy of the site.

5) Flood Risk -The site lies within a flood risk zone (and has been subject to recent significant flooding across the play area), contrary

to para 13 Government Traveller Sites Planning Policy.

6) There is no independent access to the site and serious disruption is

likely to be caused to residents of Constable House. Access would also

be immediately opposite the access to Eton Place.

7) There appears to be no evidence that consideration has been given to whether

there are places available at nearby schools.

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

The

proposal is also inconsistent with other policies in the draft Camden

Plan, which seeks to (i) provide new and/or improved sport and leisure

facilities for young people; (ii) deliver new and enhanced areas of open space and play space, and improved access to nature; (iii)

enhance

greening and biodiversity, and (iv) deliver flood mitigation measures

and sustainable drainage systems.

Consultation: There has also been no consultation with local residents

in relation to the proposed use of this site. It seems that most residents, including of the Etons and Constable House, are still unaware of the proposals.

Conclusion

For the reasons listed above, the Camden Draft Plan should be modified

to by the deletion of site C27.

Kind regards,

John Vohryzek-Samuel

Date: Fri, 27 Jun 2025 10:38:57 +0100  
From: Richard Simpson  
To: PlanningPolicy  
Subject: Camden Local Plan Submission Draft [redacted address] CAAC

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I attach the Primrose Hill CAAC's consultation response to Camden Local Plan Submission Draft 2025.

Please acknowledge receipt of this email and attachment.  
Please also let me know if any points require clarification, or there are problems with the file (pdf).

Thank you,

Richard



# PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE

25 June 2025

London Borough of Camden

by email to [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

## Camden Local Plan Submission Draft 2025 Consultation Response

### Preliminaries

1. The Primrose Hill Conservation Area Advisory Committee (PHCAAC) reviewed Camden's Local Plan Submission Draft 2025 (Plan) at its meeting on 21 May 2025 following circulation of a link to the full Plan document and a preliminary draft PHCAAC response. A draft of the PHCAAC's final response – this document – was circulated to members before final discussion and approval at our meeting on 4 June 2025.

2. The PHCAAC is a longstanding committee drawn from the local community. It includes a mix of environmental professionals – architects, a town planner, and a building surveyor – a historian, and other local people with local knowledge and expertise. Each of us is nominated either by a local community body, including local businesses, or a national or local amenity body. All 12 members are volunteers. We meet regularly, twice a month, to advise the LB Camden on all applications which affect the Primrose Hill CA. Over our 52 years of existence we have also advised on a series of development plans and associated planning documents.

3. This response follows our consultation response dated 06 March 2024 to Camden's 2024 Draft Local Plan consultation version. We acknowledge with thanks the positive responses to our 2024 comments in this 2025 Draft Plan.

4. Our response to the Plan is set out in two parts. The first is a general statement about the Plan. The second is a set of comments on specific policies and policy statements in the Plan: these range from welcome for many aspects of the Plan, to critical questions.

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### General statement

5. Broadly speaking, the PHCAAC warmly supports most of the present Plan and its specifics.

6. The PHCAAC is seriously concerned that the Plan should not undermine our heritage. The Plan contains a number of inconsistencies which we seek to have addressed.

7. As a long-standing community organization the PHCAAC has a broad perspective, addressing all aspects of planning in our area, actively informed by our local communities and engagements. We have seen many aspects of Camden's approach to heritage as both important, valued, and successful – they should not be put at risk.

8. We have seen that heritage policy has been at the root of many aspects of Camden's successful economic growth. For example, the widely-admired King's Cross redevelopment has been acknowledged as an outstanding example of heritage-led urban regeneration whether in general –

areas like Granary Square – or in specific buildings – like St Pancras station and hotel, and Coal Drops Yard with Thomas Heatherwick’s intervention. As well as commercial development substantial numbers of homes have been created.

9. More broadly, the shift in attitudes to shopping, including the convenience of on-line shopping, has given a premium to areas recognized as ‘destinations’, where heritage is a powerful determinant in defining distinctive destination. Covent Garden and Camden Lock are two world-renowned examples, but neighbourhood shopping streets like Primrose Hill’s Regent’s Park Road are supported by visitors as well as locals as destination shopping streets defined by their heritage and consequent strong sense of place.

10. Distinctive heritage areas have also offered space for new workspace, including affordable workspace, as well as commercial and hospitality uses in locations like Hawley Wharf.

11. These developments have depended on clear heritage policy, supported with determination by both Council and by local communities. King’s Cross is a prime example of a developer initially seeking wide-ranging demolition, discovering instead the benefits of a heritage-led approach.

12. Without our heritage protection over the last decades, Camden would have been a poorer place in both community cohesion and economic success.

13. As well as preservation of heritage, active heritage enhancement policy helps us all – including developers – to identify opportunities for effective and sustainable growth.

14. The clarity of heritage policy and cooperative working of Council and communities should be maintained not weakened in facing the challenges of our times: they are essential to the effectiveness of policy.

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## Specific responses

### Chapter 2 Development Strategy

Policy DS1 A.1 ‘... ensuring that new buildings and public spaces are of the highest design quality; respect and respond to local context; are inspired by the character of Camden’s neighbourhoods and communities; and are inclusive, accessible, safe and welcoming, to meet the needs of Camden’s diverse population; ...’

**PHCAAC response:** we welcome the recognition of the importance of respecting and responding to local context, of preserving ‘what is distinctive and valued about the local area’ at 2.27, and the broad understanding of ‘character’ at 2.28.

### Chapter 4 Central Camden

We note the development sites close to PHCA: C7 Morrisons site, C8 Morrisons petrol station, C9 100 Chalk Farm Road, C10 Juniper Crescent, C11 Juniper Crescent Network rail land, and C12 Gilbey’s Yard.

**PHCAAC response:** On sites C10 and C11 we welcome the recognition (pp. 138 para 9 and 141 para 2) of the importance of conserving or enhancing the significance of the Grade II\* Roundhouse and its setting, and respect locally important views in accordance with Policy D5

(Historic Environment). We also note the discussion on Camden Goods Yard (site code A506) and comments on potential impact on PHCA at pp. 165-80 (176, 178) in the *Camden Building height study final report*.

But we also record the ineffectiveness of these considerations in recent planning decisions, especially 100 & 100A Chalk Farm Road NW1 8EH (2024/0479/P revised) and Camden Goods Yard Chalk Farm road NW1 8EH (2017/3847/P, as amended by permission refs. 2020/0034/P, 2020/3116/P and 2022/3646/P).

Planning policy which is ineffective undermines both heritage and its benefits and community trust in democracy. We urge the adoption of effective and thus sound policies.

C27 Land adjacent to Constable House, Adelaide Road      see Table 5 (p. 166)      Gypsy and Traveller accommodation

**PHCAAC response:** While the PHCAAC is sympathetic to the needs of traveller families, provision should not be at the cost of other families – in this case the residents at Constable House. The site chosen at C27 would deprive the residents of Constable House of a valuable open play area.

We argue that the provisions of Local Plan SC4, and especially SC4 B.2, on safeguarding amenity space on housing estates, should be followed and not abandoned – in this case before adoption. We also note that (at 12.61) Play space provision will be expected to comply with London Plan standards and designed to be welcoming, safe, accessible and inclusive for a range of ages and needs, in particular disabled and neurodiverse users. We also note the site as suitable for active sport, see 10.65: we support the objective of promoting health and well-being and reducing physical and mental health inequalities: it should be real and not merely aspirational. None of these objectives would be met by the proposal for C27.

## Chapter 7 Housing

H1      Maximizing housing supply      pp. 208-14

H1 B.1 ‘permanent self-contained homes’      **PHCAAC response:** we welcome this policy.

H1 B.3 Ensuring homes are occupied      **PHCAAC response:** we welcome this policy.

H1 B.4 resisting the further development of housing for use as short-term lets  
**PHCAAC response:** we welcome this policy.

H3      Protecting existing homes      pp. 226-28

**PHCAAC response:** we welcome this broad policy but deeply regret the continued policy at H3 D.1 (see also 7.84-7.87) which allows single units to be consolidated into larger houses. This policy threatens the survival of the most affordable market units in an area like Primrose Hill. Policy H3 D.1 is not consistent with, and undermines, the larger policy of seeking to maximize housing supply: see 7.84 for the estimate that this policy loses 50 homes in Camden every year: a loss of 750 homes over the 15 years of the Plan. It is not ‘sound’ and should either be revised to apply only in specific circumstances (as at 7.87) or abandoned.

H4      Maximizing the supply of affordable housing      pp. 229-43

H4 A 'The Council supports the London Plan's strategic target for 50% of London's new homes to be genuinely affordable.'

**PHCAAC response:** we welcome this policy. But we very much regret that it appears ineffective. At the major Morrison's development site at Camden Goods Yard close to Primrose Hill we face a developer with consents for 644 homes who currently justifies on viability grounds a reduction in the overall provision of affordable housing from 38.1% to 15% (by habitable room) despite Camden's current Policy H4 targeting 50%. The developer proposes to leave the site incomplete if the reduction in affordable homes is not agreed by Camden (see planning application ref. 2025/0939/P 'Housing Statement' (February 2025) at 2.9)

We urge the adoption of measures – perhaps contractual terms – to make policies which are strongly supported by communities effective in meeting affordable housing need. We urge the adoption of an effective and thus sound policy.

H5 Protecting and improving affordable housing pp. 244-247

**PHCAAC response:** we welcome this policy. But we strongly urge a more effective policy in respect of protecting 'key-worker accommodation, such as nurses' homes and hostels' (H5 B, and 7. 159). We are aware in PHCA of the gradual conversion over several years of the former Nurses Home, 5-11 St Mark's Square, initially in part to single family houses, more recently to a 'boutique guesthouse' of 60 private studios for short term stays (at £130-£190 per night).

Policy (including H3 D.1) has been unable to prevent this egregious loss of affordable housing: proposed policy needs to be made effective and the larger plan sound.

**Chapter 8 Responding to the climate emergency** pp. 297-342

CC1 A.1-9 Responding to the climate emergency

**PHCAAC response:** we strongly welcome this policy.

CC1 B Requirement for a Sustainability Statement and see 8.8

**PHCAAC response:** we strongly welcome this policy.

CC2 Prioritising the retention of existing buildings and see 8.12

**PHCAAC response:** we strongly welcome this policy.

CC4 Minimizing carbon emissions

**PHCAAC response:** we welcome this policy.

CC5 Sustainability improvements to existing buildings (retrofitting) and see 8.61

**PHCAAC response:** we welcome Policy CC5 and strongly support CC5 D.

CC11 Sustainable drainage and see 8.147-8.157

**PHCAAC response:** we welcome Policy CC11.

**Chapter 9 Growing a successful and inclusive economy** pp. 343-388

IE2 Offices – protecting office uses and see 9.37

**PHCAAC response:** we support Policy IE2 C , especially in small centres.

IE4 Affordable workspace and see 9.52-9.64

**PHCAAC response:** we welcome this policy.

Designation of centres Fig 21 pp. 369-70

**PHCAAC response:** we welcome the inclusion of retail clusters at 1-31 Princess Road, and at 138-148 Gloucester Avenue as neighbourhood centres. We continue to press for the designation of 42 and 65-77 Gloucester Avenue, with their destination fish-shop and specialist bakery, as a neighbourhood centre.

IE6 Supporting designated centres and essential services and see 9.81-9.91

**PHCAAC response:** while we welcome this policy in general terms, we are concerned that the reference at IE6 A.11 to shops which have an *essential* (our emphasis) role in meeting local needs sets too high a bar for retention. We request a revision to ‘valued role’. We argue that this would be consistent with DS1 A.1 at 2.27 on preserving ‘what is distinctive and valued about the local area’. We strongly support our local shops and recognize their role in our communities.

9.102-9.104 p. 375 Ground floor uses – protection of commercial uses

**PHCAAC response:** we welcome this policy statement.

**Chapter 10 Supporting Camden’s communities** pp. 389-422

SC4 Open space

**PHCAAC response:** we urge the importance of supporting the protection of green open space throughout the Borough. Open space has environmental and ecological value but also a key role in supporting a local sense of place and belonging shared by a range of age-groups.

SC4 B.5 and 10.72-10.74 ‘... conserve and enhance the heritage value of designated open spaces and other elements of open space that make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets.’

**PHCAAC response:** we strongly endorse this policy.

SC5 Food Growing **PHCAAC response:** we welcome this policy.

SC6 Cultural facilities

**PHCAAC response:** we support this policy and welcome the inclusion of libraries.

SC7 Pubs **PHCAAC response:** we welcome this policy.

**Chapter 11 Natural environment** pp. 423-444

NE1 The natural environment **PHCAAC response:** we welcome this policy.

NE1 A.5 ‘Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;’ and 11.11-11.16 ‘Protection of other undeveloped areas including gardens.’

**PHCAAC response:** we welcome this policy and policy statements.

NE2 Biodiversity **PHCAAC response:** we welcome this policy.

NE2A.7 on gardens and biodiversity **PHCAAC response:** we strongly welcome this policy

NE3 Tree planting and protection **PHCAAC response:** we welcome this policy.

## **Chapter 12 Design and heritage** pp. 445-492

### D1 - Achieving Design Excellence

**PHCAAC response:** we note the importance of context in the development of design excellence and support the expectation at D1 B.3-4 that development will be expected to ‘preserve or enhance the historic environment and heritage assets in accordance with Policy D5 (Historic Environment)’ and will be expected to ‘respect local views and preserve protected strategic views’.

12.11 role of Conservation Area Appraisals in achieving design quality:

**PHCAAC response:** we welcome and support this statement.

12.21-12.23 Community engagement:

**PHCAAC response:** we welcome and support this statement. We note that the PHCAAC has taken an active part in pre-app discussions of proposals potentially affecting our area.

### D2 Tall Buildings

**PHCAAC response:** we argue that the Council should require evidence that a tall building is the only way to achieve the building requirement – for example, medium-rise high-density developments have long been recognized as preferable to tall buildings for housing.

D2 C.8 the Council ‘will give particular attention to ... the historic context of the building’s surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment)’

**PHCAAC response:** we welcome this policy: how can it be made effective and not merely aspirational?

We also note and strongly endorse 12.37 where ‘conservation area appraisals and management strategies’ are acknowledged as relevant to the Council’s approach to tall buildings, and 12.87 which states ‘The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.’

D2 C.9 the Council ‘will give particular attention to ... the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;’

**PHCAAC response:** we argue that ‘responds’ here is inconsistent with the statement at D1 B.4 that development will ‘respect local views and preserve protected strategic views’. The Plan should be consistent and replace ‘consider’ with ‘respects’.

D4 - Extensions and Alterations to existing buildings

12.65, 12.68 **PHCAAC response:** we welcome these statements.

D5 – Historic environment, with paras 12.74-12.109 (pp. 467-75)

**PHCAAC response:** We strongly support Policy D5. We further welcome the following:

Policy D5 D.2 ‘no optimum viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;’

**PHCAAC response:** we welcome the addition of ‘optimum’.

Policy D5 E ‘The Council will resist any cumulative, incremental, changes to a designated heritage asset, where there is concern that the changes may impact on the significance of the designated heritage asset or may cause harm to the character or appearance of a conservation area.’

**PHCAAC response:** we welcome this additional policy.

Policy D5 G, H, I, J ‘Sust[a]inability Improvements to Designated Heritage Assets see also 12.81, 12.82

**PHCAAC response :** we welcome this additional policy.

We note that the evidence required in sections H, and I, and in support of the whole building retrofit approach in J, should include a Sustainability Statement, see CC1 B. We note that the PHCAAC has actively encouraged retrofitting in our conservation area.

Please add the missing letter in ‘Sust[a]inability’.

Policy D5 K, L, conservation areas: **PHCAAC response:** we support these policies.

Policy D5 M Listed buildings: **PHCAAC response:** we support these policies with special emphasis on:

Policy D5 M.2 [The Council will] ‘resist proposals for a change of use, or alterations and extensions, including cumulative or incremental changes to a listed building, where this would cause harm to, or loss of, the significance of the building’

**PHCAAC response:** we welcome this strengthened policy.

Policy D5 M.4 [The Council will] ‘require any works to a listed building to be carried out in an appropriate manner, informed by suitably qualified heritage consultants, architects and contractors.’

**PHCAAC response:** we welcome and support this strengthened policy.

D5 S Non-designated heritage assets

**PHCAAC response:** we welcome this policy.

D5 12.77-12.78 Enhancing the historic environment.

**PHCAAC response:** We welcome and strongly support these policy statements.

D5 12.85 conservation areas Sentence 1: ‘When assessing planning applications for development within conservation areas we will consider the importance of preserving or enhancing conservation areas alongside achieving other priorities and delivering wider public benefits.’

**PHCAAC response 1:** The statement ‘we will consider the importance of preserving or enhancing conservation areas alongside achieving other priorities’ is not consistent with the statutory obligation on LPAs to ‘pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas’. The first sentence at 12.85 should be revised (see below) or deleted.

**PHCAAC response 2:** This statement is not consistent with Plan policy D5 L1: ‘[The Council will:] require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;’. The first sentence at 12.85 should be revised or deleted.

A revised Sentence 1 at 12.85 might read: ‘When assessing planning applications for development within conservation areas the Council will pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, as set out at Policy D5 (Historic Environment), while also seeking to achieve other priorities and to deliver wider public benefits.’

D5 12.85 conservation areas Sentence 2: ‘Recognising that many of the Council’s Conservation Area Appraisals do not reflect current environmental concerns or support families to alter and extend their homes to meet their needs.’

**PHCAAC response 1:** This statement appears to seek to undermine the Council’s own Conservation Area Appraisals. But these Appraisals are acknowledged in the Plan to play a valued role in a range of planning concerns in Camden, see 10.73 Open spaces with historic value, 11.16 Protection of other undeveloped areas including gardens, 12.11 Design quality in Camden, 12.37 tall buildings, 12.77 Enhancing the historic environment, 12.84 Conservation areas, 12.89 Demolition in conservation areas, and 14.49 Boundary treatments and gardens.

In terms of the role recognized for these documents in these parts of the Plan, the statement at 12.85 is inconsistent with the larger Plan and should be revised or deleted.

**PHCAAC response 2:** we see Conservation Area Appraisals as focused on the significance of heritage assets, assessments which remain relevant to the fulfilment of the Council’s statutory obligations.

We also see them as to be read in conjunction with other Planning Guidance such as ‘Camden Home Improvements CPG’ 2021, and ‘Retrofitting Planning Guidance’. This guidance can provide effective updates without duplicating guidance.

We welcome the Council’s commitment, at 12.77, to update Conservation Area Strategies, and to support their implementation.

A revised Sentence 2 at 12.85 might read: ‘The Council is committed (see 12.77) to updating Conservation Area Strategies and has issued detailed guidance for the preservation of heritage assets in the supplementary planning document Camden

Planning Guidance on design, and Retrofitting Planning Guidance (for sustainability measures in historic buildings). The Council updates planning guidance as required.'

D5 12.87 'Due to the urban nature of Camden and its varied topography, the character or appearance of our conservation areas can also be affected by development that is outside of them, but visible from within them. This includes tall or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.'

**PHCAAC response:** we welcome and support this strengthened policy statement.

D5 12.92 retaining uses which contribute to the character of a conservation area

**PHCAAC response:** we welcome this policy statement.

D5 12.93 Details **PHCAAC response:** we welcome this policy statement.

D5 12.94 Landscape **PHCAAC response:** we welcome this policy statement.

D5 12.95-12.99 Listed buildings **PHCAAC response:** we welcome this policy statement.

D5 12.109 Non designated heritage assets, including the Local List

**PHCAAC response:** we welcome this policy statement. The Local List opens engagement with heritage to a wider range of communities enhancing the sense of place which makes up Camden's character.

D5 Requested additional clause:

**PHCAAC response:** we request the addition of the following clause:

'Camden has a rich heritage of street furniture, including Listed lamp-standards, post boxes, telephone boxes, York stone paving, granite kerbs, granite setts, and cast-iron coal-hole covers. Meritorious in themselves they also provide a setting for other heritage assets and should be protected and preserved by service providers and others.'

D6 Basements

D6 Basements **PHCAAC response:** we welcome Policy D6, with specific comments as follows:

D6 A.5 **PHCAAC response:** we welcome the revised text.

D6 E.8 **PHCAAC response:** we welcome the revised text.

D6 12.112 **PHCAAC response:** we welcome the revised text of this policy statement.

D6 12.126 Cumulative impact of basement schemes **PHCAAC response:** we welcome this policy statement.

D6 12.131-132 overall size of basement development **PHCAAC response:** we support these policy statements.

D6.12.140-141 Listed buildings **PHCAAC response:** we support these policy statements.

D6.12.142-144 Lightwells **PHCAAC response:** we support these policy statements.

D7 - Advertisements and Signage **PHCAAC response:** we support this policy, with further comment:

D7 B.3 'heritage assets' and see 12.150 **PHCAAC response:** we strongly support this policy and statement.

D8 Shopfronts and see 12.158-12.166

**PHCAAC response:** we support these policies and policy statements.

D8 shop windows and see 12.167-12.170

**PHCAAC response:** we support these policies and policy statements: we specially welcome D8 B.5, 12.167, and 12.170.

### **Chapter 13 Protecting Amenity Policy A1**

**PHCAAC response:** we strongly support effective policies to protect amenity. The character of our conservation area is, in part, founded in mixed uses sited in close proximity. This makes the protection of amenity a key issue for us. We emphasise our support for the following:

A1 B.3 'impacts of artificial lighting levels' and see 13.8-13.10.

**PHCAAC response:** we strongly support recognition of the problems of light pollution both for residential accommodation and for green ecology.

A1 B.6 noise and vibration, and see 13.22-13.23.

**PHCAAC response:** the statement in 13.22 'have regard to Policy A4' is too weak: noise pollution in mixed-use areas – very common in Camden – can be seriously harmful to neighbours. Applicants should not cause harm to neighbours through noise and vibration: Policy A4 should be followed consistently for the policy to be sound.

Policy A4 Noise and vibration and see 13.83-13.110 + Appendix 4 at pp. 559-563

**PHCAAC response:** Noise in domestic gardens is mentioned in Appendix 4 Table C (p. 561) but should be referenced in Policy A4 as specially vulnerable to harm from noise and vibration.

### **Chapter 14 - Safe, Healthy and Sustainable Transport pp. 515-538**

Policy T2 - Prioritising walking, wheeling, and cycling

**PHCAAC response:** we welcome the promotion of active travel.

Policy T3 Public transport

**PHCAAC response:** we support accessible, sustainable, public transport.

Policy T5 Parking and Car-free Development

T5 A8 Boundary treatments and gardens and see 14.49-14.50

**PHCAAC response: we strongly support these policies and policy statements.**



Richard Simpson 



Date: Fri, 27 Jun 2025 10:41:02 +0100

From: Graeme Sands

To: [redacted]

Subject: OBJECTION RE: Camden Local Plan, Proposed Site Allocation C27

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

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

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

- 1) The site lies in an amenity area enjoyed by many local residents as a precious local green open space with flowers and many trees, including recently planted fruit trees. It is vital that Camden protects the few open spaces it has still remaining as essential environmental lungs for the Borough and its residents.
- 2) The site was preserved as a playground for residents of Constable House and should be protected as such.
- 3) There is insufficient space in this part of Camden to accommodate new residents and traffic which would undoubtedly be created by travellers and their vehicles accessing the site.
- 4) The area is densely populated already with large historic mansion blocks and new apartments.
- 5) a gypsy and traveller site is totally inappropriate and totally unacceptable

Responder 477

Date: Fri, 27 Jun 2025 10:43:03 +0100  
From: Sally Welbourn  
To: [redacted]  
Subject: C27 – Land adjacent to Constable House, Adelaide Rd

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I understand that the Council is considering designating the above area as a traveller site.

Given the density of housing in this area - both Constable House and the Etons opposite - it seems unlikely that creating further accommodation in such a small space with limited access points will produce a good outcome. Moreover, it will take amenity away from Constable House when it actually deserves more. The Etons are not blessed with that much amenity either.

I would urge Camden Council to consider enhancing the area by improving the existing amenity for the residents of Constable House. Its residents should not have to sacrifice what little there is for further development. Moreover those living in the general vicinity of Adelaide Road have put up with an enormous amount of disruption from the HS2 works. A wildlife site was lost as a result. It seems a great shame that an area which is there to provide amenity to Constable House should be lost as well. I hope the Council will reconsider.

Yours sincerely

Sally Welbourn  
[redacted]  
[redacted] [redacted postcode]